Fresh Mushrooms from Canada

Investigation Nos. 701-TA-778 and 731-TA-1764 (Preliminary)

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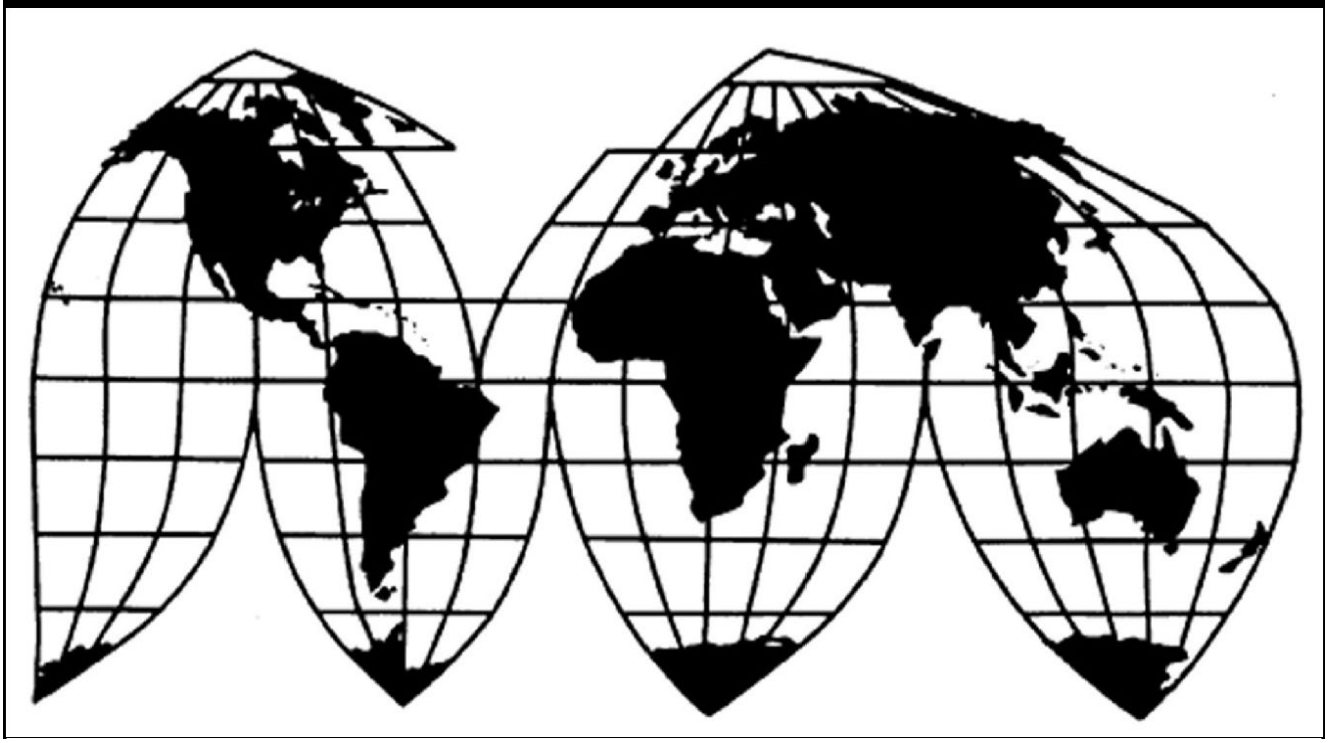
U.S. International Trade Commission



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Note.—Information that would reveal confidential operations of individual firms may not be published.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-778 and 731-TA-1764 (Preliminary)

Fresh Mushrooms from Canada

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of fresh mushrooms from Canada, provided for in subheading 0709.51.01 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value ("LTFV") and imports of the subject merchandise from Canada that are alleged to be subsidized by the government of Canada.[2]

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission's rules, upon notice from the U.S. Department of Commerce ("Commerce") of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Any other party may file an entry of appearance for the final phase of the investigations after publication of the final phase notice of scheduling. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations. As provided in section 207.20 of the Commission's rules,

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

[2] 91 FR 663 and 91 FR 668 (January 8, 2026).

the Director of the Office of Investigations will circulate draft questionnaires for the final phase of the investigations to parties to the investigations, placing copies on the Commission's Electronic Document Information System (EDIS, https://edis.usitc.gov), for comment.

BACKGROUND

On September 16, 2025, the Fresh Mushrooms Fair Trade Coalition and its individual members[3] filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of fresh mushrooms from Canada and LTFV imports of fresh mushrooms from Canada. Accordingly, effective September 16, 2025, the Commission instituted countervailing duty investigation No. 701-TA-778 and antidumping duty investigation No. 731-TA-1764 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference 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* of September 19, 2025 (90 FR 45245).[4] The Commission conducted its conference on November 21, 2025. All persons who requested the opportunity were permitted to participate.

[3] The individual members of the Fresh Mushrooms Fair Trade Coalition are: Giorgio Fresh Co. (including Donna Bella Farms LLC and Giorgi Mushroom Co.); J-M Farms LLC; Kennett Square Mushroom Operation LLC; Modern Mushroom Farms, Inc.; Needham's Mushroom Farms, Inc.; and Sher-Rockee Mushroom Farms.

[4] Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in a subsequent notice published in the Federal Register on November 19, 2025 (90 FR 52094). The Commission subsequently published a second revised schedule on January 16, 2026 (91 FR 2151) to conform with Commerce's new schedule after Commerce extended the deadline for its initiation determinations from December 15, 2025 to January 2, 2026 (90 FR 60059, December 23, 2025).

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of fresh mushrooms that are allegedly sold in the United States at less than fair value and subsidized by the government of Canada.

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.[1] In applying this standard, the Commission weighs the evidence before it and determines whether "(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation."[2]

II. Background

Parties to the Investigation. The petitions in these investigations were filed on September 16, 2025, by the Fresh Mushrooms Fair Trade Coalition, an *ad hoc* group of companies consisting of Giorgio Fresh Co. ("Giorgio") (including Donna Bella Farms LLC ("Donna Bella Farms") and Giorgi Mushroom Co. ("Giorgi")), J-M Farms LLC ("J-M Farms"), Kennett Square Mushroom Operation LLC ("Kennett Square"), Modern Mushroom Farms, Inc. ("Modern Mushroom"), Needham's Mushroom Farms, Inc. ("Needham's"), and Sher-Rockee Mushroom Farms ("Sher-Rockee"), U.S. growers and packers of fresh mushrooms ("Petitioners").[3]

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[1] 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States, 2*0 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

[2] *American Lamb Co.*, 785 F.2d at 1001; *see also Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

[3] Petition, volume I, EDIS Doc. No. 861984 (Sept. 16, 2025) at 1 n.1. In September 2025, the Commission initially established its schedule for the preliminary phase of the investigations. Notice, EDIS Doc. No. 868840 (Jan. 13, 2026) ("ITC Jan. 2026 Notice"). The Commission subsequently revised the schedule in November 2025 due to a lapse in appropriations and ensuing cessation of Commission operations. *Id.* On December 15, 2025, the Department of Commerce ("Commerce") extended the deadline for initiating the investigations pursuant to 19 U.S.C. §§ 1671a(c)(1)(B) and 1673a(c)(1)(B) so that it could poll the domestic industry regarding whether support exists for the petition. *Fresh Mushrooms from Canada*, 90 Fed. Reg. 60,059 (Dep't of Commerce Dec. 23, 2025) (notice of extension of the deadline for determining the adequacy of the antidumping and countervailing duty petitioners). (Continued…)

Petitioners appeared at the staff conference accompanied by counsel and submitted a postconference brief.[4] The Canadian Mushroom Growers' Association, a trade association comprised of 23 Canadian producers and exporters of subject merchandise ("Mushrooms Canada"),[5] appeared at the staff conference and submitted a postconference brief.[6] Also, the Government of Canada appeared at the staff conference accompanied by counsel.[7]

Data Coverage. The period of investigation in the preliminary phase of these investigations is January 2022 through June 2025 ("POI"). U.S. industry data are based on questionnaire responses of 12 firms that accounted for approximately *** percent of U.S. production of mushrooms in 2024.[8] U.S. imports are based on the questionnaire responses of eight U.S. importers, estimated to account for *** percent of U.S. imports from Canada in 2024.[9] The Commission received responses to its foreign producer/exporter questionnaires from 12 firms in Canada, accounting for all exports of subject merchandise to the United States and approximately *** percent of production of subject merchandise in Canada in 2024.[10]

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the "domestic like product" and the

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Commerce subsequently initiated the investigations on January 2, 2026. *Fresh Mushrooms from Canada*, 91 Fed. Reg. 663 (Dep't of Commerce Jan. 8, 2026) (notice of initiation of antidumping investigation) ("*AD Initiation Notice*"); *Fresh Mushrooms from Canada*, 91 Fed. Reg. 668 (Dep't of Commerce Jan. 8, 2026) (notice of initiation of countervailing duty investigation) ("*CVD Initiation Notice*"). Accordingly, the Commission revised its preliminary investigation schedule to conform with Commerce's new schedule. ITC Jan. 2026 Notice.

[4] Petitioners' Postconference Brief, EDIS Doc. No. 864942 (Nov. 25, 2025) ("Petitioners' Postconference Brief").

[5] *See* Entry of Appearance, EDIS Doc. No. 862173 (Sept. 17, 2025) at 1-2.

[6] Mushrooms Canada's Postconference Brief, EDIS Doc. No. 864981 (Nov. 25, 2025) ("Mushrooms Canada's Postconference Brief").

[7] *See* Embassy of Canada Written Testimony, EDIS Doc. No. 864603 (Nov. 20, 2025).

[8] Confidential Staff Report ("CR/PR"), INV-XX-143 (Dec. 10, 2025) at 1.4, 3.1, & Tables 3.1 & 3.9, Public Report, *Fresh Mushrooms from Canada*, Inv. Nos. 701-TA-778 and 731-TA-1764 (Preliminary), USITC Pub. 5695 (Jan. 2026) at 1.4, 3.1 n.1 & Tables 3.1 & 3.9. Responding U.S. producers consist of eight packers with integrated growing facilities and four independent growers through most of the POI. *Id*. at 1.4. In November 2024, ***. *** U.S. Producer Questionnaire Response, EDIS Doc. No. 864043 (Oct. 15, 2025) at II-3c. Accordingly, the domestic industry consisted of seven packers with integrated growing facilities and five independent growers for 2024 and interim 2025. CR/PR at 3.1 n.1. Throughout this opinion, we refer to the eight packers with integrated growing facilities as "domestic packers," "integrated packers," "packers," or "U.S. packers." We refer to the independent growers as "independent growers" or "growers." We refer to the packers and independent growers combined as "U.S. producers" or "domestic producers."

[9] CR/PR at 1.4, 4.1 & Table 4.1.

[10] CR/PR at 7.3 & Table 7.1.

"industry."[11] 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."[12] 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."[13]

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 the U.S. Department of Commerce ("Commerce").[14] 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."[15] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[16] 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 uses" on a case-by-case basis.[17] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the

[11] 19 U.S.C. § 1677(4)(A).

[12] 19 U.S.C. § 1677(4)(A).

[13] 19 U.S.C. § 1677(10).

[14] 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).

[15] *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).

[16] *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).

[17] *See, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); NEC Corp. v. Department of Commerce, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); 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).

facts of a particular investigation.[18] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[19] The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.[20]

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

> The merchandise covered by these investigations is fresh mushrooms of the genus *Agaricus* ("fresh mushrooms"). This includes – but is not limited to – fresh mushrooms of the species *Agaricus bisporus*, which are commonly referred to as button mushrooms, chestnut mushrooms, cremini or crimini mushrooms, baby bellas, portabella or portobello mushrooms, table mushrooms, or as white or browns. Fresh mushrooms include whole mushrooms, as well as mushrooms that have been sliced, diced, or separated into stems and pieces prior to importation. Fresh mushrooms may also be imported in bulk or loose form, or may be imported in individual containers packaged for retail sale. The scope of these investigations includes all fresh mushrooms of the genus *Agaricus*, whether or not organic, and irrespective of age, cut, color, size, species, or packaging.
>
> Subject merchandise may be cleaned, washed, inspected, subjected to metal detection, sliced, diced, or de-stemmed, and/or vacuum cooled prior to importation, but otherwise undergoes minimal further processing. The scope of these investigations covers fresh mushrooms of the genus *Agaricus* regardless of end use, including both mushrooms destined for the fresh market and mushrooms intended for food processing.
>
> Fresh mushrooms of the genus *Agaricus* are currently classifiable under HTSUS statistical reporting number 0709.51.0100. Although the HTSUS statistical reporting number is provided for

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[18] *See*, *e.g.*, S. Rep. No. 96-249 at 90-91 (1979).

[19] *See*, *e.g.*, *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.").

[20] *See*, *e.g.*, *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington,* 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

convenience and customs purposes, the written description of the scope of these investigations is dispositive.[21]

The merchandise covered by the scope in these investigations is fresh mushrooms of the genus *Agaricus*, including species *Agaricus bisporus* and *Agaricus campestris*.[22] *Agaricus bisporus* is the most commonly known cultivated mushroom.[23] It is marketed as baby bella, button, chestnut, cremini (also spelled as crimini), portabella, portobello, or table mushrooms. *Agaricus bisporus* is the dominant edible mushroom grown commercially in the United States. *Agaricus campestris* is commonly known as the field mushroom.[24] While edible, *Agaricus campestris* is not grown commercially due to its comparatively quicker maturity period and shorter shelf life.[25] The merchandise covered by the proposed scope may be cleaned, washed, inspected, subjected to metal detection, sliced, diced, destemmed, and/or vacuum cooled prior to importation, but otherwise undergoes minimal additional processing.[26]

In their immature state, fresh mushrooms typically measure one to four inches in cap diameter, and may be white or brown.[27] In their mature state, fresh mushrooms typically measure four to six inches in cap diameter, and are almost always brown.[28] As a foodstuff, fresh mushrooms are known for their mild flavor, firm texture, and nutritional value, with the common varieties (*i.e.*, button, cremini, and portabella) often having a strong umami flavor and meaty texture when cooked.[29] Customers typically use fresh mushrooms in culinary applications, either as an ingredient in other dishes or as a main course unto themselves.[30] Although fresh mushrooms are consumed raw in applications such as salads, they are often sautéed, roasted, or grilled to tenderize them and bring out stronger flavors.[31]

The cultivation of fresh mushrooms begins with compost, a nutrient-rich substrate that improves fertility and facilitates growth of mycelia (*i.e.*, mushroom spawn).[32] The compost is

[21] CR/PR at 1.6; *AD Initiation Notice*, 91 Fed. Reg. at 667-68; *CVD Initiation Notice*, 91 Fed. Reg. at 671-72.

[22] CR/PR at 1.8.

[23] CR/PR at 1.8.

[24] CR/PR at 1.8.

[25] Mushrooms belonging to the species *Agaricus bisporus* have an average shelf life of 12 days, and must be harvested, packaged, and transported within that timeframe. CR/PR at 1.13.

[26] CR/PR at 1.8; *see also* Transcript of the Preliminary Conference, EDIS Doc. No. 865402 (Nov. 21, 2025) ("Conference Tr.") at 70-71 (Jurgensmeyer) ("I would say minimally processed within the scope would be when you package sliced mushrooms in a till or a box that's going to the restaurant industry or to the retail trade, and I would say further processed would be something that's going to go into the canned market, something that may be a cooked product preserved in a can at a further spot down the road.").

[27] CR/PR at 1.8.

[28] CR/PR at 1.8.

[29] CR/PR at 1.8-1.9.

[30] CR/PR at 1.9.

[31] CR/PR at 1.9.

[32] CR/PR at 1.10.

formed by wetting, mixing, and aerating its constituent ingredients in an industrial turner.[33] The compost is then layered into large horizontal racks (inside of a specialized structure designed to control light, airflow, temperature, and humidity).[34] In a process known as spawning, the compost is inoculated with evenly distributed mycelia that is either broadcasted over the surface of the compost beds, "ruffled in" slightly under the compost's surface, or mixed in using specially designed mechanized equipment.[35] Next, in a process known as casing, an additional layer of soil, limestone, peat moss, and/or recycled compost is uniformly applied on the surface of the substrate with mycelia, acting as a water reserve in which larger mycelia can form and eventually begin fruiting.[36] In the pinning stage, fresh air is introduced into the environment as pins (immature mushrooms) begin to emerge, to reduce the concentration of carbon dioxide and encourage further growth.[37] Once the mushrooms have matured sufficiently, they are harvested in recurring three-to-five-day windows (known as flushes or breaks), with yields tapering with each subsequent flush.[38] Harvesting may be undertaken manually or mechanically. Harvesting rates can vary from 30 to 80 pounds per hour, depending on the amount of harvestable crop and the size of the mushrooms.[39]

The harvested mushrooms are then shipped from the growing location to the packing location.[40] Transportation and storage require a highly controlled environment—including a complete cold chain—to maintain adequate freshness and limit bacterial growth.[41] The mushrooms are washed and undergo an extensive quality assurance process to ensure they meet relevant standards.[42] The mushrooms may be sorted, such that lower quality mushrooms intended for food processing are separated from higher quality mushrooms destined for the fresh market.[43] Finally, the mushrooms are packed for shipment to the final customer, either into smaller containers for retail sale or into larger containers for food service distribution.[44]

A. Arguments of the Parties

Petitioners contend that the Commission should define a single domestic like product, consisting of all fresh mushrooms, coextensive with the scope.[45]

Respondent, Mushrooms Canada agrees with Petitioners that the definition of the

[33] CR/PR at 1.10.
[34] CR/PR at 1.10.
[35] CR/PR at 1.10-1.11.
[36] CR/PR at 1.11.
[37] CR/PR at 1.11.
[38] CR/PR at 1.12.
[39] CR/PR at 1.12.
[40] CR/PR at 1.13.
[41] CR/PR at 1.13.
[42] CR/PR at 1.13.
[43] CR/PR at 1.13.
[44] CR/PR at 1.13.
[45] Petition, volume I at 11-13; Petitioners' Postconference Brief at 3-5.

domestic like product should mirror the scope in these investigations.[46]

B. Analysis

Based on the record, in these preliminary phase investigations, and in the absence of any contrary argument, we define a single domestic like product consisting of fresh mushrooms, coextensive with Commerce's scope.

Physical Characteristics and Uses. The record indicates that all fresh mushrooms covered by the scope share the same basic physical characteristics and genetic profile, of the genus *Agaricus*, with immature mushrooms typically white in color with a cap diameter of between one to four inches, and mature mushrooms typically brown with a cap diameter of between four to six inches.[47] *Agaricus* mushrooms are primarily used for consumption in their fresh form, or are incorporated into other foodstuffs and culinary applications.[48] [49]

Manufacturing Facilities, Production Processes and Employees. The record indicates that the production process for in-scope fresh mushrooms follows the same five basic steps summarized earlier in this section, namely composting, spawning, casing, pinning, and harvesting, before being shipped to a packing location.[50] According to Petitioners, all in-scope fresh mushrooms share the same production process, are produced by the same producers, in the same facilities, using the same equipment operated by the same employees.[51] [52]

Channels of Distribution. The record indicates that in-scope fresh mushrooms sold in the U.S. market are mainly packaged into individual containers and shipped predominantly to retailers, with a substantial proportion sold to food distributors in larger packages, and the remainder are shipped to food processors for incorporation into downstream products.[53]

In-scope mushrooms are typically sold as high-volume, low-cost products through mass-market retail channels, whereas specialty exotic mushrooms are low-volume, high-margin

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[46] Mushrooms Canada Postconference Brief at 1; *see also id*. at Attachment A, Responses to Commission Staff Questions, at 9 (reserving the right to revisit this issue in any final phase of these investigations).

[47] CR/PR at 1.8; Petitioners' Postconference Brief at 4.

[48] CR/PR at 1.9 & 2.7.

[49] Out-of-scope mushrooms are mostly exotic or specialty mushrooms (*e.g.,* shiitake or oyster mushrooms). CR/PR at 3.14. Such mushrooms have distinct genetic profiles, a "much wider range of flavors and textures," and offer "stronger, more specific flavors that are suited to niche or gourmet applications." *Id.* at D.3-D.4. Petitioners contend that out-of-scope specialty exotic mushrooms, such as shiitake and oyster mushrooms, have distinct genetic profiles, and are employed towards "different uses, different recipes." Petitioners' Postconference Brief at 5; Conference Tr. at 69 (Carroll).

[50] CR/PR at 1.10-1.13; Petition, volume I at 12.

[51] Petition, volume I at 12; Petitioners' Postconference Brief at 4; Conference Tr. at 69-70 (Morey).

[52] According to Petitioners, out-of-scope specialty exotic mushrooms are produced using different raw materials and cultivated in different environmental conditions, typically in bags or logs of compressed sawdust using a production process that does not involve composting or pasteurization. Petition, volume I at 12; Petitioners' Postconference Brief at 4; Conference Tr. at 69-70 (Morey).

[53] CR/PR at 1.13.

products primarily sold directly to end-use consumers.[54]

Interchangeability. The record indicates that all in-scope fresh mushrooms are edible and used in culinary applications, with the overwhelming majority either consumed raw or sauteed, roasted, or grilled, and the remainder sold to industrial food processors for incorporation into downstream products such as dried, frozen, or preserved mushrooms.[55] Record evidence also indicates that *Agaricus* mushrooms have a common strong umami flavor and meaty texture and are generally substitutable with one another in culinary applications.[56] [57]

Producer and Customer Perceptions. Information on the record indicates producers and consumers perceive *Agaricus* mushrooms as high volume, low-cost products.[58] Petitioners contend that producers and customers perceive in-scope mushrooms as familiar, versatile, and affordable ingredients for everyday cooking.[59] [60]

Price. The available pricing data indicate that prices for all domestically produced fresh mushrooms generally fell within a similar range during the POI.[61] [62]

Conclusion. For the preliminary phase of these investigations, we define a single domestic like product consisting of fresh mushrooms, coextensive with the scope. There are no clear dividing lines among in-scope fresh mushrooms. The evidence on the record shows that all in-scope fresh mushrooms have the same physical characteristics, share the same genetic profile, and have the same range of end uses. Although the extent of automation may differ across U.S. production sites, the record indicates that all fresh mushrooms are produced through the same production processes at the same manufacturing facilities using the same employees. The record also indicates that all fresh mushrooms are all sold through the same channels of distribution, are perceived as a distinct product category, and are interchangeable for the same range of end uses. Further, evidence on the record indicates that all fresh mushrooms are sold within the same general range of prices.

In light of this record, and in the absence of any contrary arguments, we define a single domestic like product consisting of fresh mushrooms, coextensive with the scope.

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[54] CR/PR at 1.13; Petition, volume I at 12; Petitioners' Postconference Brief at 4-5; Conference Tr. at 24 (Shelton); *id.* at 34 (Moule).

[55] CR/PR at 1.9 & 1.13.

[56] CR/PR at 1.9.

[57] Out-of-scope mushroom species are not easily substituted for *Agaricus* mushrooms due to key differences in texture and taste. CR/PR at D.3-D.4.

[58] Petition, volume I at 12 (characterizing in-scope mushrooms as affordable); CR/PR at D.8 & D.11 (commenting that in-scope mushrooms are generally less expensive than other types of mushrooms).

[59] Petition, volume I at 12; CR/PR at Table 1.2, D.7-D.8 & D.10-D.11.

[60] Petitioners contend that out-of-scope specialty exotic mushrooms are purportedly consumed as premium cooking ingredients or for distinct health benefits. Petition, volume I at 12; CR/PR at Table 1.2, D.7-D.8 & D.10-D.11.

[61] CR/PR at Table 5.12; Staff Worksheet, EDIS Doc. No 868863 (Jan. 14, 2026), ALT Table F.9 ("Staff Worksheet").

[62] The record indicates that out-of-scope specialty exotic mushrooms are significantly more expensive than in-scope mushrooms because they are specialty products that are produced and sold on a smaller scale. CR/PR at D.8 & D.11.

IV. 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."[63] 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 or which are themselves importers.[64] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[65]

A. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that the Commission should exclude U.S. producers *** from the domestic industry as related parties.[66] They argue that *** are related to U.S. importers/Canadian producers *** through common parent, ***, whereas *** is related to U.S. importer *** through common parent ***.[67] They assert that exclusion of these producers is appropriate because their primary interest is in importing subject merchandise and that including these producers in the domestic industry will skew domestic industry data.[68]

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[63] 19 U.S.C. § 1677(4)(A).

[64] *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).

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

(1) the percentage of domestic production attributable to the importing producer;

(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(4) the ratio of import shipments to U.S. production for the imported product; and

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

[66] Petitioners' Postconference Brief at 6.

[67] Petitioners' Postconference Brief at 6.

[68] Petitioners' Postconference Brief at 6-10. Petitioners further contend in their impact-related arguments that these two producers managed to ***, in contrast to other responding U.S. producers. *Id*. at 24-25.

Respondents' Arguments. Mushrooms Canada contends that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party and that record evidence supports that its interests lie in domestic production.[69] It also argues that excluding *** would risk skewing the data for the rest of the industry by removing sales and other financial data for the few U.S. producers that used new infrastructure to produce fresh mushrooms and otherwise supplied a significant portion of the U.S. market during the POI.[70]

B. Analysis

U.S. producers *** and ***, are subject to possible exclusion under the related parties provision because they imported subject merchandise during the POI and are related to U.S. importers and Canadian exporters of subject merchandise. *** is related to U.S. importer *** that imported subject merchandise throughout the POI and also is related to Canadian producers and exporters *** through common parent ***.[71] *** is related to U.S. importers/Canadian producers and exporters *** through common parent, ***; ***.[72] We consider below whether appropriate circumstances exist to exclude either of these producers from the domestic industry.

. *** was the second smallest of the eight responding U.S. packers in 2024, accounting for *** percent of U.S. production of fresh mushrooms in this period. It *** the petitions.[73] Its affiliated importer imported *** pounds of subject merchandise in 2022, *** pounds in 2023, and *** pounds in 2024; its affiliated importer imported *** pounds in January through June 2025 ("interim 2025"), up from *** pounds in January through June 2024 ("interim 2024").[74] The ratio of imports of subject merchandise by its affiliated importer to *** U.S. production was *** percent in 2022, *** percent in 2023 and *** percent in 2024; it was *** percent in interim 2025, up from *** percent in interim 2024.[75] *** states that its affiliate imported subject merchandise during the POI to ***.[76] ***.[77] *** reports shipping to the ***.[78] *** reports shipping to the ***.[79] *** reported capital expenditures of $ in 2022, $*** in 2023, and $*** in 2024; they were $*** in interim 2025, up from $*** in interim

[69] Mushrooms Canada's Postconference Brief at 6-7 & Attachment A, Responses to Commission Staff Questions at 9-13. Mushrooms Canada does not address whether *** should be excluded from the domestic industry as a related party. *Id.*

[70] Mushrooms Canada's Postconference Brief at 6-7 & Attachment A, Responses to Commission Staff Questions at 9-13.

[71] CR/PR at Table 3.2.

[72] CR/PR at Table 3.2.

[73] CR/PR at Table 3.1.

[74] CR/PR at Table 3.14.

[75] CR/PR at Table 3.14.

[76] CR/PR at Table 3.16.

[77] *** U.S. Importer Questionnaire Response, EDIS Doc. No. 863966 (Nov. 17, 2025) *** U.S. Importer Questionnaire Response") at II-4.

[78] *** U.S. Producer Questionnaire Response, EDIS Doc. No. 864001 (Sept. 30, 2025) ("*** U.S. Producer Questionnaire Response") at IV-10.

[79] *** U.S. Importer Questionnaire Response at III-11.

2024.[80] Its financial performance was *** than the financial performance reported by responding domestic producers as a whole.[81]

Given the foregoing, based on the record in the preliminary phase of these investigations, we find that appropriate circumstances exist to exclude *** from the domestic industry pursuant to the related parties provision.[82]

***. *** was the fourth largest of the responding U.S. packers in 2024, accounting for *** percent of U.S. production of fresh mushrooms in this period. It *** the petitions.[83] Its affiliated U.S. importers imported subject merchandise throughout the POI. Its affiliated importers imported *** pounds in 2022, *** pounds in 2023, and *** pounds in 2024; they

[80] CR/PR at Tables 6.9 & 6.10.

[81] *Compare* CR/PR at Table 6.8 (containing firm-specific data), *with id.* at Table 6.6 (containing data for U.S. producers as a whole); *see also* Staff Worksheet, ALT Table C.2 (revising data for U.S. producers to exclude ***).

[82] Chair Karpel finds that the record evidence available in this preliminary phase of the investigations appears to indicate that *** relationship with its affiliated U.S. importer *** had the effect of shielding *** from subject import competition. As noted above, *** states that it acquired ***. CR/PR at Table 3.16. Because U.S. importer ***. Chair Karpel finds that the record further indicates that this shielding relationship may skew the data if *** is not excluded from the domestic industry. *** accounted for approximately *** of the volume of subject imports during the POI, ***. *Compare* CR/PR at Table 3.14, *with id.* at Table 4.2. *** imports of subject merchandise were *** pounds in 2022, *** pounds in 2023, and *** pounds in 2024; they were *** pounds in interim 2024 and *** pounds in interim 2025. *Id.* at Table 3.14. The volume of subject imports was *** pounds in 2022, *** pounds in 2023, and *** pounds in 2024; they were *** pounds in interim 2025, compared to *** pounds in interim 2024. *Id.* at Table 4.2. Chair Karpel also finds that the ratio of *** subject imports to *** domestic production was *** throughout the POI, and the domestic industry's market share loss is notably lower if *** is included in the domestic industry, indicating that *** did not suffer market share losses comparable to other U.S. producers. *Id.* at Table 3.14. *Compare id.* at Table C.1 (*** percentage point market share shift 2022-2024; *** percentage point market share difference across interim periods), *with* Staff Worksheet, ALT Table C.2 (*** percentage point market share shift 2022-2024; *** percentage point market share difference across interim periods). Further, Chair Karpel finds that *** had significantly stronger financial performance relative to the responding domestic producers as a whole, which to the extent that is reflective of its being shielded in part from the effects of subject imports would indicate that its inclusion in the domestic industry would skew the domestic industry data and potentially mask injury. Its sales in the *** suggesting it may have faced different competitive condition than other U.S. producers. *** U.S. Producer Questionnaire Response at IV-10. In any final phase of these investigations, Chair Karpel intends to further examine the extent to which *** is shielded from subject import competition, including the extent to which *** competes with fresh mushrooms imported by non-affiliated U.S. importers.

Commissioner Johanson finds that for the purpose of these preliminary investigations appropriate circumstances exist to exclude *** from the domestic industry in light of its position on the petitions and the ratio between its domestic production and the imports of its affiliated importer. He will further consider the issue in any final phase of these investigations.

Commissioner Kearns does not find there is sufficient information to determine whether exclusion of *** is appropriate and will further consider the issue in any final phase of these investigations.

[83] CR/PR at Table 3.1.

imported *** pounds in interim 2025, up from *** pounds in interim 2024.[84] The ratio of imports of subject merchandise by its affiliated importers to *** U.S. production was *** percent in 2022, *** percent in 2023, and *** percent in 2024; it was *** percent in interim 2025, up from *** percent in interim 2024.[85] *** states that its affiliates imported subject merchandise during the POI because ***.[86] *** reported capital expenditures of $*** in 2022, $*** in 2023, and $*** in 2024; they were $*** in interim 2025, down from $*** in interim 2024.[87] Its financial performance was *** than the financial performance reported by responding domestic producers as a whole, though its performance, as Petitioners note, *** from 2022 to 2024, unlike the industry as a whole.[88]

The record is mixed with respect to ***. The ratio of its affiliates' subject imports *** to domestic production was *** throughout the POI; *** the petitions.[89] However, its ***, and its financial performance was *** than the responding domestic producers as a whole throughout the POI.[90] The limited record in these preliminary phase investigations also does not contain information indicating that *** was shielded from subject import competition or otherwise benefitted from its *** subject imports such that its inclusion in the domestic industry would skew industry data or mask injury. On balance, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

Accordingly, for purposes of the preliminary phase of these investigations we define the domestic industry to include all domestic producers of fresh mushrooms, except for ***.[91]

V. 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 be deemed negligible.[92]

The Commission's questionnaire data indicate that from October 2024 through September 2025, the 12-month period preceding the filing of the petitions, subject imports from Canada accounted for *** percent of total U.S. imports of fresh mushrooms.[93] As subject imports are well above negligible levels, we find that imports of fresh mushrooms from Canada are not negligible.

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[84] CR/PR at Table 3.15.

[85] CR/PR at Table 3.15.

[86] CR/PR at Table 3.16.

[87] CR/PR at Tables 6.9-6.10.

[88] *Compare* CR/PR at Table 6.8 (containing firm-specific data), *with id.* at Table 6.6 (containing data for U.S. producers as a whole); Petitioners' Postconference Brief at 8.

[89] CR/PR at Tables 3.1 & 3.15.

[90] CR/PR at Tables 6.6 & 6.8-6.10.

[91] In any final phase investigations, we will further consider whether there are appropriate circumstances to exclude either domestic producer from the domestic industry.

[92] 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B).

[93] CR/PR at Table 4.4.

VI. Reasonable Indication of Material Injury by Reason of Subject Imports

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[94] In making this 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.[95] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[96] In assessing whether there is a reasonable indication that 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.[97] 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."[98]

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[99] 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.[100] 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.[101]

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[94] 19 U.S.C. §§ 1671b(a), 1673b(a).

[95] 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).

[96] 19 U.S.C. § 1677(7)(A).

[97] 19 U.S.C. § 1677(7)(C)(iii).

[98] 19 U.S.C. § 1677(7)(C)(iii).

[99] 19 U.S.C. §§ 1671b(a), 1673b(a).

[100] *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).

[101] 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 (Continued…)

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.[102] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[103] 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.[104] It is clear that the existence of injury caused by other factors does not compel a negative

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(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).

[102] The Uruguay Round Agreements Act Statement of Administrative Action, H. Doc. 103-316 (1994) ("SAA") states 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.

[103] 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.").

[104] S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

determination.[105]

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."[106] 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." [107] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[108]

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.[109] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[110]

B. Conditions of Competition and the Business Cycle

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

1. Demand Conditions

Domestic demand for fresh mushrooms is largely driven by demand for the final end-

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[105] *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.").

[106] *Mittal Steel*, 542 F.3d at 876 &78; *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*.

[107] *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.

[108] *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.").

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

[110] *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.").

use products in which they are used.[111] Retail-grade mushrooms are often used in recipes by consumers at home, while food-service grade mushrooms (small to moderate-size mushrooms) are used by restaurants. Soup-grade mushrooms (larger mushrooms) are typically further processed.[112] The overall demand for fresh mushrooms is likely to experience large changes in response to changes in price.[113] According to Respondent South Mill, demand for fresh mushrooms has decreased by approximately 10 percent since before the COVID-19 pandemic due to overall cost constraints on the consumer and rising food costs.[114] Petitioners contend that demand for fresh mushrooms "has declined moderately over the POI."[115]

Four of eight U.S. producers and six of eight importers indicated that the market for fresh mushrooms is seasonal.[116] Demand is highest for fresh mushrooms during the first and last quarter of the year and around the major holiday season.[117] Importer *** reported that fresh mushrooms face more competition from other vegetables in the spring and summer.[118] Petitioners stated that peak mushroom consumption generally occurs during the winter holidays although portobello mushroom demand peaks in the summer during grilling season.[119] Respondent Farmers' Fresh stated that there are some increases during the holidays, but overall, there is not much variation over the course of the year.[120] Respondent South Mill stated that mushroom growers face a significant challenge around those peaks in demand that are relatively extreme spikes in a short period of time, citing 30 to 50 percent spikes in demand over the course of seven to ten days.[121]

Most firms reported a decrease in U.S. demand for fresh mushrooms since January 1, 2022.[122] Five of seven responding U.S. producers and four of seven responding U.S. importers reported that overall U.S. demand for fresh mushrooms has steadily decreased since January 2022.[123]

Apparent U.S. consumption of fresh mushrooms declined from *** percent during the 2022 to 2024 full year period of the POI, falling from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024.[124] It was *** percent lower in interim 2025, at *** pounds, than in interim 2024, at *** pounds.[125]

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[111] CR/PR at 2.7.

[112] CR/PR at 2.7.

[113] CR/PR at 2.7.

[114] CR/PR at 2.7 (citing Conference Tr. at 186-187 (Macleod, McLean)). Mushrooms Canada also emphasized that appearance and shelf life affects demand for fresh mushrooms. Mushrooms Canada's Postconference Brief at 1 & 8-9.

[115] Petitioners' Postconference Brief at 12.

[116] CR/PR at 2.8.

[117] CR/PR at 2.8.

[118] CR/PR at 2.8.

[119] CR/PR at 2.8.

[120] CR/PR at 2.8.

[121] CR/PR at 2.8.

[122] CR/PR at 2.8 & Table 2.6.

[123] CR/PR at Table 2.6.

[124] CR/PR at Table 4.5.

[125] CR/PR at Table 4.5.

2. Supply Conditions

During the POI, the domestic industry accounted for the largest share of the U.S. market, although it lost market share to subject imports during that time. The industry's share of overall apparent U.S. consumption decreased by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was *** percentage points lower in interim 2025, at *** percent, than in interim 2024, at *** percent.[126]

The Commission received usable questionnaire responses from 12 U.S. producers, which includes both packers, which package and ship fresh mushrooms using products grown themselves or acquired from affiliated or unaffiliated growers, and independent growers, which do not themselves perform packing operations.[127] Of U.S. packers, *** accounted for the largest share of U.S. production covered by U.S. packers' total reporting in 2024 at *** percent, followed by *** at *** percent, *** at *** percent, *** at *** percent, *** at *** percent, *** at *** percent, and *** at *** percent.[128] Of U.S. independent growers without packing operations, *** accounted for *** percent of U.S. production covered by growers' total reporting in 2024, followed by *** at *** percent, *** at *** percent, *** at *** percent, and *** at *** percent.[129]

During the POI, a small number of U.S. producers opened new plants, acquired new facilities, or otherwise expanded production, and several curtailed production or closed plants.[130] U.S. packers' U.S. shipments declined by *** percent from 2022 to 2024, falling from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024; they were *** percent lower in interim 2025, at *** pounds, than in interim 2024, at *** pounds.[131]

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[126] Staff Worksheet, ALT Table C.2.

[127] CR/PR at 3.1 & n.1.

[128] CR/PR at Table 3.1. Excluded U.S. producer *** accounted for *** percent of U.S. production in 2024. *Id.*

[129] CR/PR at Table 3.1. ***. *Id.* at 3.1 n.1.

[130] CR/PR at Table 3.4. In terms of U.S. producers who opened new plants, acquired new facilities or expanded production in 2025, ***. *Id.* In 2024, ***. *Id.* ***. *Id.* ***. *Id.* In August 2024, ***. *Id.* In 2023, ***. *Id.*

In terms of plant closings, in December 2024, Monterey Mushrooms closed a fresh mushroom growing and packing facility in Royal Oaks, California, ***. Petitioners' Postconference Brief at Ex. 5 Declaration of *** ¶¶ 4-5; CR/PR at Table 3.4. ***. Petitioners' Postconference Brief at Ex. 5 *** ¶¶ 4-6. In June 2023 ***, ***. CR/PR at Table 3.4; Petitioners' Postconference Brief at Ex. 1, Answer to Question 7.

In terms of production curtailments, ***. CR/PR at Table 3.3; Petitioners' Postconference Brief at Ex. 7, Declaration of David Carroll ("Carroll Dec.") ¶ 11. In addition, *** and ***. CR/PR at Table 3.4; *see also* Petitioners' Postconference Brief at Ex. 2 at 20 (identifying several additional closures of U.S. fresh mushrooms farms during the POI); Conference Tr. at 42 (Herrmann) (noting that several of the growers who closed their operations during the POI did not submit responses to the Commission's questionnaire).

[131] Staff Worksheet, ALT Table C.2.

Domestic packers' reported excess capacity throughout the POI.[132] Their practical capacity declined by *** percent from 2022 to 2024, falling from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024; it was *** percent lower in interim 2025, at *** pounds, than in interim 2024, at *** pounds.[133] Domestic packers' capacity utilization declined irregularly by *** percentage points over the POI, falling from *** percent in 2022 to *** percent in 2023, before rising to *** percent in 2024; it was *** percentage points lower in interim 2025, at *** percent, than in interim 2024; at *** percent.[134]

The market share of subject imports increased by *** percentage points from 2022 to 2024, increasing from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.[135] Their market share was *** percentage points higher in interim 2025, at *** percent, than in interim 2024, at *** percent.[136]

The market share of nonsubject imports declined by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.[137] Nonsubject imports decreased by *** percentage points in interim 2025, at *** percent, compared interim 2024, at *** percent.[138] The largest sources of nonsubject imports during the POI were Mexico and China.[139]

Two of eight U.S. producers and three of eight importers reported that they had not experienced supply constraints since January 1, 2022. Of the U.S. producers that reported they had experienced supply constraints, two producers reported experiencing supply constraints during 2022 through 2024, and one reported experiencing a supply constraint in 2025. Of the importers, three reported that the constraints occurred during 2022 and 2023, five reported that they occurred during 2024, and three reported that they occurred during 2025.[140] In addition, ***.[141]

The U.S. mushroom industry is concentrated in Pennsylvania where the largest growers are located, and the second-highest number of U.S. producers are located in California.[142]

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[132] *Derived from* Staff Worksheet, ALT Table C.2. The industry's excess capacity increased irregularly by *** percent from 2022 to 2024, rising from *** pounds in 2022 to *** pounds in 2023, before falling to *** pounds in 2024; it was *** percent lower in interim 2025, at *** pounds, compared to interim 2024, at *** pounds. *Id.* Questionnaire coverage in the preliminary phase of these investigations ranged from *** percent to *** percent. CR/PR at Table 3.9.

[133] Staff Worksheet, ALT Table C.2.

[134] CR/PR at 3.5 & Tables 3.5 & 3.7.

[135] CR/PR at Tables 4.5 & C.1.

[136] Staff Worksheet, ALT Table C.2.

[137] CR/PR at Tables 4.5 & C.1.

[138] Staff Worksheet, ALT Table C.2.

[139] CR/PR at 2.5.

[140] CR/PR at 2.5-2.6 & Table 2.5. Constraints reported by U.S. producers included poor crop yields related to disease, or ***. *Id.* at 2.6. U.S. importers reported production disruptions due to severe storms, fire, and disease. *Id.*

[141] ***, EDIS Doc. No. 863635 (Sept. 30, 2025) at 6 ***; ***; *see also* CR/PR at 5.28.

[142] CR/PR at Table 3.1; Petitioners' Postconference Brief at 31 ("Regarding respondents' claim that most U.S. mushrooms are grown in Pennsylvania, petitioners do not disagree"); CR/PR at 2.4, 3.14 & Table 3.10; Mushrooms Canada's Postconference Brief at 18-19 & Exs. 5-7.

Petitioners and Respondent agree that U.S. producers have a practice of "steaming off," destroying or otherwise instructing growers not to grow or harvest mushroom crops, but they disagree on the reasons for this practice. Respondents argue that Pennsylvania growers have recently engaged in steaming off because of phorid flies, insects that feed off of fungi and plants,[143] while Petitioners argue that steaming off primarily occurs because packers cannot sell their mushrooms at what they consider to be a fair price.[144] In addition, according to Petitioners, US producers reported that they have sold fresh mushrooms that they would have been otherwise unable to sell to soup processors at a reduced price.[145]

3. Substitutability and Other Conditions

We find that there is a moderately high degree of substitutability between subject imports and the domestic like product.[146] The majority of U.S. producers (five of eight) reported that subject imports can always be used interchangeably with the domestic like product, with the remainder reporting that they can sometimes be used interchangeably.[147] Conversely, a majority of importers (five of seven), reported that the subject imports and the domestic like product can sometimes be used interchangeably, with the remainder reporting

[143] CR/PR at Table 3.3 (noting that effective January 2025 Pennsylvania's Department of Agriculture issued a mandatory quarantine or "steaming off order" to all mushroom growers in Kenneth and New Garden townships to help deal with the phorid fly infestation causing crop damage); Mushrooms Canada's Postconference Brief at 10-11, 17-23, Ex. 8 & Ex. 17, Declaration of Lewis Macleod ("Macleod Dec.") ¶ 6 (explaining that "{s}teaming off is recognized as an essential but costly remedy to address fly infestations"); Petitioners' Postconference Brief at 32. Petitioners contend that phorid flies are seasonal and begin to emerge in June, peak in July and August, and decline in September when temperatures cool. Petitioners' Postconference Brief at 32; *id.* at Ex. 10, Declaration of James Ciarrocchi ("Ciarrocchi Dec.") ¶ 3.

[144] Petitioners' Postconference Brief at 13, 31-32; *id.* Ex. 5 (***; *id.* at Ex. 7 (Carroll Dec.) ¶¶ 11-12 (explaining that yield rates have declined as a result of U.S. producers electing to "steam off" crops due to a lack of sales resulting from an influx of subject imports); *id.* at Ex. 11, Declaration of Ron Moule ("Moule Dec.") ¶ 8 (stating that Kennett Square's packer has requested that it "steam off" rooms in order to reduce production that the packer could not sell due to low-priced subject imports); Conference Tr. at 60, 66, and 106 (Carroll); *id.* at 84-85 (Jurgensmeyer). *But see* Conference Tr. at 194 (Porter) (stating that South Mill and Canadian producers only "steam-off" product because of disease or in "certain special situations"); *id.* at 192 (Macleod); *see also* Mushrooms Canada's Postconference Brief at Ex. 17 (Macleod Dec.) ¶¶ 5-14 (disputing ***). Petitioners also refer to "steaming off" growing rooms, or heating growing rooms to an elevated temperature in order to kill flies, larvae and eggs that phorid flies have laid in the compost. Petitioners' Postconference Brief at 32 & Ex. 10 (Ciarrocchi Dec.) ¶ 7.

[145] Conference Tr. at 98 (Rosenthal); Petitioners' Postconference Brief at 13-14. *But see* Mushrooms Canada's Postconference Brief at Ex. 17 (Macleod Dec.) ¶¶ 6-14 (***).

[146] CR/PR at 2.9.

[147] CR/PR at Table 2.8. Of the three U.S. producers reporting that the domestic like product and subject imports are sometimes interchangeable, ***. *See* *** U.S. Producer Questionnaire Response at IV-20; *** U.S. Producer Questionnaire Response, EDIS Doc. No. 864004 (Nov. 12, 2025) at IV-20.

that they can always be used interchangeably.[148] Similarly, a majority of responding U.S. producers (five of eight) reported that factors other than price are never significant in comparisons of the domestic like product and subject imports.[149] Petitioners have provided additional declaratory evidence postconference as to interchangeability of fresh mushrooms and comparability across purchasing factors such as quality and availability, regardless of source.[150] Most responding importers (six of seven), however, reported that factors other than price are always or frequently important in such comparisons.[151] Mushrooms Canada contends that factors such as appearance, quality, shelf life, and different transportation and differing lead times limit substitutability. It maintains that mushrooms produced on "old-generation" infrastructure that is prevalent in the United States have higher exposure to pests such as phorid flies, a shorter shelf life, and less consistent yields, than mushrooms grown at farms using the newer infrastructure, such as that used by many Canadian producers.[152]

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[148] CR/PR at Table 2.9.

[149] CR/PR at Table 2.10. The remaining three responding U.S. producers were evenly divided with one each reporting that factors other than price are always, frequently, or sometimes significant in comparisons of the domestic like product and subject imports. *Id.*

[150] Petitioners' Postconference Brief at Ex. 7 (Carroll Dec.) ¶¶ 4-18; *id.* at Ex. 11 (Moule Dec.) ¶¶ 2, 7. During the staff conference, Petitioners' witnesses testified that subject imports and the domestic like product are of comparable quality and are often sold next to each other in stores. Conference Tr. at 11 (Herrmann) (stating that claims that Canadian mushrooms are higher-quality than domestic mushrooms are "incorrect" and that "U.S. and Canadian mushrooms are sold interchangeably by distributors and retailers reflecting the importance of price"); *id.* at 21 (Carroll) (explaining that packers engage in "quality assurance processes" and that U.S. producer Giorgi "take{s} pride in the quality of our mushrooms," has "one of the lowest product rejection rates in the business," and is "constantly ranked as a top-tier supplier by our customers"); *id.* at 28 (Jurgensmeyer) (stating that "{t}he quality of the mushrooms produced by {J-M} is every bit as good as, if not better, than the quality of Canadian mushrooms" and noting that some customers sell "both U.S. and Canadian mushrooms in the same store side-by-side").

[151] CR/PR at Table 2.11.

[152] Mushrooms Canada's Postconference Brief at 11-16 & Attachment A, Responses to Commission Staff Questions at 14-15; CR/PR at 2.2 & 2.9; ***, EDIS Doc. No. 863962 (Nov. 12, 2025) ("*** U.S. Importer Questionnaire Response"), at Additional Explanation at 1-11 & Attachments A-J; Conference Tr. at 142-153 (Macleod); *id.* at 166-167 (Cambon). *But see* Conference Tr. at 53 (Carroll) (noting that Giorgi had built a facility using newer-generation infrastructure but that in that facility "our quality is no better than, in fact, probably not as good as from our standard rooms" and that "{w}e're not seeing the labor savings or increased quality or you know, much better, yields" at that facility); Petitioners' Postconference Brief at Ex. 7 (Carroll Dec.) ¶¶ 4-9 (elaborating on this position). The Commission intends to further explore the role of non-price factors including the impact of phorid flies on these factors and the degree that they affect substitutability in any final phase of these investigations.

Respondents assert that there are two types of infrastructure for growing mushrooms, "old-generation," which, among other differences, primarily uses wooden composting beds to grow mushrooms and relies heavily on manual labor, and "new-generation," which uses porous metal shelves for growing mushrooms, often has an additional composting phase, and relies more heavily on computerized/automated equipment than on manual labor. CR/PR at 1.12-1.13; Mushrooms Canada's (Continued…)

We find that price is an important factor in purchasing decisions for fresh mushrooms, along with other factors. U.S. purchasers responding to the domestic producers' lost sales and lost revenue allegations reported that price/cost was among the top three factors that influenced their purchasing decisions, along with quality and availability/supply.[153] Of those factors, quality was the most frequently cited top factor (cited by seven firms), followed by availability/supply and price/cost, which were each cited by one firm.[154]

Both the domestic like product and subject imports are primarily produced to order. U.S. producers reported that *** percent of their U.S. commercial shipments were produced to order in 2024, with lead times averaging three days, while *** percent were sold from inventories in 2024, with lead times also averaging three days.[155] Similarly, importers reported that *** percent of their U.S. commercial shipments were produced to order in 2024, with lead times averaging three days, and *** percent were sold from inventories, with lead times averaging two days.[156]

Most of the domestic like product was sold under annual contracts, with a sizeable share under long-term contracts, while a plurality of subject imports were sold under annual contracts. U.S. producers reported that *** percent of their sales were under annual contracts, and such sales constituted *** percent of U.S. importers' sales.[157] U.S. producers reported selling *** percent of their commercial shipments through long-term contracts, while U.S. importers reported selling *** percent under short-term contracts.[158] Domestic producers and importers reported setting prices mostly by using contracts and set price lists.[159]

Postconference Brief at 11-16 & Exs. 3- 4. They argue that customers prefer fresh mushrooms grown on new-generation infrastructure because new-generation infrastructure yields more consistent and higher quality mushrooms that are less prone to diseases and pests such as phorid flies. *** U.S. Importer Questionnaire Response at Additional Explanation; Mushrooms Canada's Postconference Brief at 11-16 & Ex. 14. Petitioners, however, contend that there is no industry standard for so-called "old-generation" versus "new-generation" production, that subject producers' ability to avoid phorid fly infestations is attributable to location rather than production methods, and the metal shelving used in so-called "new-generation" production requires compost that is more susceptible to serious diseases, such as green mold and various viruses. Petitioners' Postconference Brief at 15-16; *id.* at Ex. 7 (Carroll Dec.) ¶¶ 4-8; *id.* at Ex. 11 (Moule Dec.) ¶ 2.

[153] CR/PR at 2.10 & Table 2.7. An additional factor reported by several firms was proximity and shipping lead times. *Id.* at 2.10. During the staff conference, Petitioners' witnesses explained that customers focus on price first, and only then differentiate fresh mushroom producers by quality or service levels. Conference Tr. at 126-27 (Jurgensmeyer); *id.* at 127-28 (Ciarrocchi); *id.* at 128 (Carroll).

[154] CR/PR at Table 2.7. Similarly, three firms each cited price/cost and availability/supply as the second most important factor. *Id.* Mushrooms Canada incorrectly states that no purchaser listed price as the most important factor. Mushrooms Canada's Postconference Brief at 28; *id.* at Attachment A, Responses to Commission Staff Questions at 15; *id.* at Ex. 10. One questionnaire response stated *** was the most important factor. ***, EDIS Doc. No. 863627 (Nov. 14, 2025) at 7. Based on this response, the Commission understood *** to identify both price and quality as the most important factor.

[155] CR/PR at 2.10.

[156] CR/PR at 2.10.

[157] CR/PR at 5.5 & Table 5.5.

[158] CR/PR at 5.5 & Table 5.5.

[159] CR/PR at 5.5 & Table 5.4.

Raw material costs accounted for the largest share of U.S. integrated packers' internal growing costs, throughout the POI, followed by labor.[160] Compost is the major raw material input used in fresh mushroom production.[161] Compost prices increased overall from January 2022 to November 2024, with prices increasing from 2022 to mid-2023 and then decreasing with fluctuations through the end of 2024.[162] Compost fluctuated between *** and *** percent of U.S. packers' cost of goods sold ("COGS") from 2022 to 2024.[163]

Fresh mushrooms are perishable and have a limited shelf life of approximately 12 days, so they must be harvested, packaged, and transported within that timeframe.[164] U.S. producers and importers of subject merchandise reported selling fresh mushrooms to all regions of the United States.[165] Both U.S. producers' and importers' largest volume of sales were between 101 and 1,000 miles of their production facility or U.S. point of shipment. For the remainder of their sales, U.S. producers were fairly evenly divided with 22.7 percent of sales made within 100 miles of their production facility, and 19.9 percent of sales made over 1,000 miles away from their facility, while U.S. importers made 8.8 percent of sales within 100 miles of their U.S. point of entry, and 30.1 percent over 1,000 miles from their U.S. point of entry.[166] Petitioners maintain that they are able to deliver fresh mushrooms to the West Coast within two and a half days, while Mushrooms Canada reports that demand for subject imports has been increasing due to higher demand on the West Coast.[167] Mushrooms Canada also contends that prices for fresh mushrooms are higher on the West Coast than on the East Coast.[168]

Petitioners contend that increasing the volume of brown mushrooms grown can reduce crop yields because brown mushrooms take longer to mature than white mushrooms.[169]

Effective March 4, 2025, fresh mushrooms originating in Canada became subject to an additional 25 percent *ad valorem* duty under the International Emergency Economic Powers Act

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[160] CR/PR at 5.1; Staff Worksheet, ALT Table G.5. Integrated U.S. packers' average unit costs ("AUVs") for growing raw materials increased by *** percent from 2022 to 2024, rising from $*** per pound in 2022 to $*** per pound in 2023 and 2024; the AUVs from U.S. packers' growing raw materials were *** percent higher in interim 2025 at $*** per pound, than in interim 2024 at $*** per pound. *Id.* at Table 6.2.

[161] CR/PR at 5.1, Figures 5.1-5.2 & Tables 5.1-5.3 ; Staff Worksheet, ALT Table G.5. Petitioner Giorgi is vertically integrated and produces its own compost, but most other U.S. growers may purchase compost as an input. CR/PR at 5.1 & n.1; Conference Tr. at 19-20 (Carroll).

[162] CR/PR at 5.1, Table 5.1 & Figure 5.1. Data regarding compost costs after December 2024 are not yet available. *Id.* at 5.1 & n.2.

[163] Staff Worksheet, ALT Table G.5.

[164] CR/PR at 1.13; Petitioners' Postconference Brief at 41; *id.* at Ex. 1, Answer to Question 8; *** U.S. Importer Questionnaire Response at Additional Explanation at 1-2 & Attachment C.

[165] CR/PR at 2.3 & Table 2.3.

[166] CR/PR at 2.2-2.3.

[167] CR/PR at 2.4 (citing Conference Tr. at 75 (Shelton) & *id.* at 164 (McLean)).

[168] Mushrooms Canada Postconference Brief at 32-33.

[169] Petitioners' Postconference Brief at 33 n.4; *id.* at Ex. 7 (Carroll Dec.) ¶ 14; *id.* at Ex. 11 (Moule Dec.) ¶ 4 & Attachment 1; Mushrooms Canada's Postconference Brief at Ex. 12 at 2 ("There has been a long-term shift from white buttons to crimini/baby bellas and portabellas.").

("IEEPA");[170] however, effective March 7, 2025, products originating in Canada that enter with duty free treatment pursuant to the United States-Mexico-Canada Agreement, a category that includes fresh mushrooms, are no longer subject to the additional *ad valorem* duty under IEEPA.[171]

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."[172]

The volume of subject imports increased by *** percent from 2022 to 2024, rising from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024.[173] The volume of subject imports was *** percent higher in interim 2025, at *** pounds, than in interim 2024, at *** pounds.[174]

Subject imports as a share of apparent U.S. consumption increased by *** percentage points from 2022 to 2024, rising from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; their share of U.S. consumption was *** percentage points higher in interim 2025, at *** percent, than in interim 2024, at *** percent.[175] [176]

Based on the record in the preliminary phase of these investigations, we find that the volume of subject imports is significant in absolute terms and relative to consumption in the United States, and that the increase in that volume is significant 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 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

[170] 50 U.S.C. § 1701, *et seq.*

[171] CR/PR at 1.7 & n.15.

[172] 19 U.S.C. § 1677(7)(C)(i).

[173] CR/PR at 4.2 & Table 4.2. The increase in the volume of subject imports occurred as apparent U.S. consumption declined. *Compare* CR/PR at Table 4.2 with Table 4.5 & Figure 4.2.

[174] CR/PR at 4.2 & Table 4.2.

[175] Staff Worksheet, ALT Table C.2.

[176] The ratio of subject imports to U.S. production increased by *** percentage points from 2022 to 2024, increasing from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was *** percentage points higher in interim 2025, at *** percent, than in interim 2024, at *** percent. *Derived from comparing* Staff Worksheet, Alt Table C.2, *with* CR/PR at Table 4.2.

(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.[177]

As discussed in Section VI.B.3 above, we find that there is a moderately high degree of substitutability between subject imports and the domestic like product, and that price is an important factor in purchasing decisions for fresh mushrooms, along with other factors.

The Commission collected quarterly quantity and f.o.b. pricing data for sales of six fresh mushroom products shipped to unrelated U.S. customers during the POI.[178] Eight U.S. producers and seven U.S. importers provided usable pricing data for sales of the requested products although not all firms provided usable pricing data for all quarters.[179] The reported pricing data accounted for *** percent of U.S. producers' commercial U.S. shipments and *** percent of U.S. importers' commercial U.S. shipments of fresh mushrooms in 2024.[180]

As an initial matter, Petitioners assert that including data for pricing products 5 and 6, which combine both conventional and organic mushrooms, distort the pricing data because organic fresh mushrooms are a premium product that are more expensive than conventional fresh mushrooms.[181] Record evidence – specifically the price differences between pricing product 1, organic white button mushrooms, and pricing product 2, conventional white button mushrooms – supports Petitioners' position that pricing for organic and conventional mushrooms is sufficiently different that combining those products limits the utility of the pricing data for pricing products 5 and 6.[182] In addition, during the staff conference, counsel for

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[177] 19 U.S.C. § 1677(7)(C)(ii).

[178] CR/PR at 5.7. The six pricing products are:

***Product 1*.** Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic.

***Product 2*.** Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

***Product 3*.** Browns (creminis or baby bellas), medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

***Product 4*.** Whites, medium whole, in 5 to 10 pound boxes, marketed as conventional.

***Product 5*.** Whites, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

***Product 6*.** Brown, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Id. Petitioners requested pricing products 1-4, which specify either organic or conventional products, and counsel for Mushrooms Canada requested pricing products 5-6, which include both organic and conventional products, in an email to staff dated September 17, 2025. *See* Email from D. Porter to N. Christ regarding proposed additional pricing products, EDIS Doc. No. 866220 (Sept. 17, 2025); CR/PR at 5.7 n.10. Staff subsequently adopted all six pricing product definitions.

[179] CR/PR at 5.7 & n.11.

[180] CR/PR at 5.7.

[181] Conference Tr. at 39-40 & 81-82 (Herrmann) (arguing that "organic products do sell at a higher price point than conventional products" and that combining those products in pricing products 5 and 6 "basically distorts the ability for the Commission to make apples-to-apples comparisons across those two products").

[182] Staff Worksheet, ALT Table F.9. Specifically, the domestic producer price for pricing product 1 for U.S. producers ranged from $*** per pound to $*** per pound, whereas the domestic producer price for pricing product 2 ranged from $*** to $*** per pound. *Id.* For subject imports, the price for (Continued…)

Mushrooms Canada acknowledged that "in the market there may be some price differences" between organic and conventional fresh mushrooms.[183] Accordingly, for purposes of the preliminary phase of these investigations, we accord less weight to the price comparisons for pricing products 5 and 6.[184]

Subject imports undersold the domestic like product for products 1-4 in *** quarterly comparisons with margins of underselling ranging from *** to *** percent and averaging *** percent.[185] Overselling occurred in the remaining *** quarterly comparisons for products 1-4 with margins of overselling ranging from *** percent to *** percent and averaging *** percent.[186] There were *** pounds of subject imports in quarters with underselling, compared to the *** pounds in quarters with overselling.[187] [188]

We have also considered information from purchasers regarding alleged lost sales. Responding purchasers reported purchasing *** pounds of fresh mushrooms during the POI; apparent U.S. consumption during the POI totaled *** pounds.[189] Of nine responding purchasers, seven reported that they had purchased subject imports instead of U.S.-produced product.[190] Two of those purchasers reported that subject import prices were lower than those of U.S.-produced product, and one of the purchasers reported that price was the primary reason for its decision to purchase subject imports rather than the domestic product, but did not provide a quantity.[191] Purchasers' explanations for their changes in purchasing decisions

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pricing product 1 ranged from $*** per pound to $*** per pound, and prices for pricing product 2 ranged from $*** per pound to $*** per pound. *Id.* Thus, for U.S. producers, prices were between $*** per pound and $*** per pound higher for pricing product 1 than for pricing product 2, and for subject imports prices for pricing product 1 were between $*** per pound and $*** per pound higher than for pricing product 2. *Calculated from id.*

[183] Conference Tr. at 251 (Porter). Witnesses for Mushrooms Canada also testified, however, that there is not a major difference in the cost of production between organic and non-organic fresh mushrooms for producers that grow mushrooms on newer infrastructure. Conference Tr. at 251 (Porter); *id.* at 208 (Cambon); *id.* at 208-209 & 252-53 (Macleod); *see also* Mushrooms Canada's Postconference Br. at Attachment A, Responses to Commission Staff Questions at 2-3 & 24-25.

[184] In any final phase of these investigations, we invite the parties to submit comments on the draft questionnaires in order to assist the Commission in defining the pricing products.

[185] Staff Worksheet, ALT Table F.7. There were no reported instances of underselling for pricing product 5.

[186] Staff Worksheet, ALT Table F.7.

[187] Staff Worksheet, ALT Table F.7.

[188] For pricing products 5-6, underselling occurred in *** quarterly comparisons at a margin of underselling of *** percent. Staff Worksheet, ALT Table F.7. Overselling occurred in the remaining *** quarterly comparisons for pricing products 5-6 with margins of overselling ranging from *** percent to *** percent and averaging *** percent. *Id.* There were *** pounds of subject imports in quarters with underselling, compared to the *** in quarters with overselling. *Id.*

[189] CR/PR at 5.23 & *Calculated from* Tables 4.5 & C.1.

[190] CR/PR at 5.25.

[191] CR/PR at 5.24; ***, EDIS Doc. No. 863628 (Oct. 6, 2025) at 5 (stating that ***); CR/PR at Table 5.19 (***).

varied and included plant closures, quality, service issues, ***, and mushroom disease on the East Coast.[192]

Based on the foregoing, including the moderately high degree of substitutability between subject imports and the domestic like product, the importance of price (among other factors) in purchasing decisions, and the preponderant evidence of subject import underselling, we find that subject imports significantly undersold the domestic like product during the POI. The underselling by subject imports led subject imports to gain market share over the POI at the expense of the domestic industry, which lost *** percentage points of market share to subject imports from 2022 to 2024 and *** percentage points of market share to subject imports between interim 2025 and interim 2024.[193]

We have also considered whether subject imports depressed or suppressed domestic producer prices to a significant degree during the POI. U.S. producers' prices generally either steadily increased or increased with fluctuations within a narrow band.[194] Subject import prices also generally increased throughout the POI for all pricing products, with larger increases occurring in late 2022 and 2023, and fluctuating downwards for the remainder of the POI.[195]

The record shows that U.S. producers experienced a cost-price squeeze from 2022 to 2024 and from interim 2024 to interim 2025. Specifically, the domestic producers' unit COGS increased by $*** per pound or *** percent from 2022 to 2024, [196] while their net sales unit

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[192] CR/PR at 5.24 & Table 5.19 (discussing ***; *id.* at Table 5.19 (noting that ***).

[193] Staff Worksheet, ALT Table C.2. As noted in section IV.B, we intend to further investigate in any final phase of these investigations the extent to production infrastructure and any associated problems with phorid flies may have impacted purchasing decisions.

[194] Staff Worksheet, ALT Tables F.9 & ALT Figure F.7. U.S. producers' prices for product 1, increased overall by *** percent over the POI, ***. *Id.* at ALT Table F.1, ALT Figure F.1 & ALT Table F.9 Prices ***. *Id.* at ALT Table F.1 & ALT Figure F.1. U.S. producers' prices for product 2, which ***, increased by *** percent over the POI, ***. *Id.* at ALT Table F.9, ALT Table F.2 & ALT Figure F.2. U.S. producers' prices for product 3, increased overall by *** percent over the POI, ***. *Id.* at ALT Table F.3, ALT Figure F.3 & ALT Table F.9. *Id.* U.S. producers' prices of product 4 decreased overall by *** percent over the POI, ***. *Id.* at ALT Table F.4, ALT Figure F.4 & ALT Table F.6. U.S. producers' prices for pricing product 5, which ***, increased overall by *** percent over the POI, with a ***. *Id.* at ALT Table F.5, ALT Figure F.5 & ALT Table F.9. Prices then ***. *Id.* U.S. producers' prices for pricing product 6 increased overall by *** percent over the POI, ***. *Id.* at ALT Table F.6, ALT Figure F.6 & ALT Table F.9.

[195] CR/PR at 5.17, Table 5.14 & Figure F.10; Staff Worksheet, ALT Table F.9. Subject import prices for product 1, ***, decreased overall by *** percent over the POI, ***. CR/PR at Tables 5.12 & 5.14 & Figure 5.3. Subject import prices for product 2, increased by *** percent over the POI ***. *Id.* Subject import prices for product 3 increased by *** percent over the POI, ***. *Id.* at Tables 5.12 & 5.14 & Figure 5.5. Subject import prices for product 4, ***, increased by *** percent over the POI, ***. *Id.* at Tables 5.12 & 5.14 & Figure 5.6. Subject import prices for pricing product 5 increased by *** percent over the POI, ***. *Id.* at Tables 5.12 & 5.14 & Figure 5.6. Subject import prices for pricing product 6 increased by *** percent over the POI, with ***. *Id.* at Tables 5.12 & 5.14 & Figure 5.8. Prices ***. *Id.*

[196] Staff Worksheet, ALT Table C.2, ALT Table G.3 & ALT Table G.4. Domestic producers' unit COGS increased by *** percent from 2022 to 2024, rising from $*** per pound in 2022 to $*** per pound in 2023 and $*** per pound in 2024; they were *** percent lower in interim 2025, at $*** per pound, than in interim 2024, at $*** per pound. *Id.*

(Continued…)

value increased by only $*** per pound or *** percent during this period.[197] In the interim periods, the domestic producers' unit COGS were $*** per pound or *** lower in interim 2025 compared to interim 2024, while their net sales values were $*** per pound or *** percent lower.[198] Thus, from 2022 to 2024, the increase in U.S. producers' net sales unit value was smaller than the increase in their unit COGS, on both a per-pound and percentage basis, and in interim 2025, the decrease in U.S. producers' net sales was greater than the decrease in its unit COGS, on both a per-pound and percentage basis.[199] As a result, domestic producers' COGS-to-net-sales ratio increased by *** percentage points from 2022 to 2024, and it was *** percentage points higher in interim 2025, than in interim 2024.[200]

Since apparent U.S. consumption declined by *** percent from 2022 to 2024 and by *** percent in interim 2025 compared to interim 2024, and most market participants reported overall declining demand, while U.S. producers' fresh mushroom prices increased for some products during some periods, based on the record evidence discussed above, we cannot conclude that subject imports did not prevent price increases, which otherwise would have occurred, to a significant degree.[201]

The domestic packers' unit COGS increased by *** percent from 2022 to 2024, rising from $*** per pound in 2022 to $*** per pound in 2023 and $*** per pound in 2024; they were *** percentage points lower in interim 2025, at $***, than in interim 2024, at $***. *Id.*

[197] Staff Worksheet, ALT Table C.2 & ALT Table G.2. U.S. producers' net sales unit values rose by *** percent from 2022 to 2024, increasing from $*** per pound in 2022 to $*** per pound in 2023, before falling to $*** per pound in 2024; they were *** percent lower in interim 2025, at $*** per pound, than in interim 2024, at $*** per pound. *Id.*

U.S. packers' net sales unit value increased irregularly by *** percent from 2022 to 2024, rising from $*** per pound in 2022 to $*** per pound in 2023, before falling to $*** per pound in 2024; it was *** percentage points lower in interim 2025 at $*** per pound, than in interim 2024 at $*** per pound. *Id.*

Independent growers' net sales unit value increased by *** percent from 2022 to 2024, rising from $*** per pound in 2022 to $*** per pound in 2023 and $*** per pound in 2024; it was *** percent higher in interim 2025, at $*** per pound, than in interim 2024, at $*** per pound. CR/PR at Tables 6.4 & C.1.

[198] Staff Worksheet, ALT Table C.2, ALT Table G.3 & ALT Table G.4.

[199] Staff Worksheet, ALT Table C.2 & ALT Tables G.2-G.3.

[200] Staff Worksheet, ALT Table C.2 & ALT Tables G.1-G.2. Domestic producers' COGS-to-net-sales ratio rose from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was higher in interim 2025, at *** percent, compared to interim 2024, at *** percent. *Id.*

The domestic packers' COGS-to-net-sales ratio increased by *** percentage points from 2022 to 2024, rising from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was *** percentage points higher in interim 2025 at *** percent, than in interim 2024 at *** percent. *Id.*

Independent growers' ratio of operating expenses to net sales increased irregularly by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023, before rising to *** percent in 2024; it was *** percentage points lower in interim 2025, at *** percent, than in interim 2024, at *** percent. CR/PR at Table 6.4.

[201] In any final phase of these investigations, we intend further investigate factors, such as demand and apparent U.S. consumption that may affect domestic prices.

In sum, for purposes of these preliminary investigations, we find that subject imports undersold the domestic like product to a significant degree, and that underselling contributed to a market share shift from the domestic industry to subject imports. We also cannot conclude that subject imports did not suppress domestic producer prices to a significant degree. Thus, we find that subject imports had significant price effects.

E. Impact of the Subject Imports[202]

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." 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 debt, research and development, and factors affecting domestic prices. 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."[203]

U.S. producers became increasingly unprofitable from 2022 to 2024, and their financial performance either worsened or remained poor in interim 2025. The domestic industry's trade performance also generally declined throughout the POI and in interim 2025.

According to the Commission's questionnaire data, U.S. producers' total *Agaricus* mushroom production decreased irregularly by *** percent from 2022 to 2024.[204] Domestic producers' surface area for growing *Agaricus* mushrooms not intended for further processing declined by *** percent from 2022 to 2024; however, producers' yield of *Agaricus* mushrooms not intended for further processing increased by *** pounds per square foot during that period.[205] U.S. packers' practical capacity,[206] production,[207] U.S. shipments,[208]

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[202] In its notice initiating the antidumping duty investigation on fresh mushrooms from Canada, Commerce reported estimated dumping margins ranging from 26.29 to 38.31 percent for subject imports from Canada. *AD Initiation Notice*, 91 Fed. Reg. at 666.

[203] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

[204] CR/PR at Table 3.9. U.S. production of *Agaricus* mushrooms fell from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024. *Id.*

[205] CR/PR at Table 3.7. U.S. producers' surface area devoted to *Agaricus* mushrooms not intended for further processing fell from *** square feet in 2022 to *** square feet in 2023 and *** square feet in 2024. *Id.* Producers' yield of such mushrooms rose from *** pounds per square foot in 2022 to *** pounds per square foot in 2023 and *** pounds per square foot in 2024. *Id.*

[206] Staff Worksheet, ALT Table C.2. U.S. packers' practical capacity declined by *** percent from 2022 to 2024, falling from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024; it was *** percent lower in interim 2025, at *** pounds, compared to interim 2024, at *** pounds. *Id.*

[207] Staff Worksheet, ALT Table C.2. U.S. packers' production decreased by *** percent from 2022 to 2024, falling from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024; it was *** percent lower in interim 2025, at *** pounds, than in interim 2024, at *** pounds. *Id.*

[208] Staff Worksheet, ALT Table C.2. Domestic packers' U.S. shipments declined by *** percent from 2022 to 2024, falling from *** pounds in 2022 to *** pounds in 2023, and *** pounds in 2024; they were *** percent lower in interim 2025, at *** pounds, than in interim 2024, at *** pounds. *Id.*

capacity utilization, [209] and market share,[210] all declined overall from 2022 to 2024, and experienced declines in interim 2025.

Domestic packers' end-of-period inventories decreased by *** percent from 2022 to 2024 and were *** percent lower in interim 2025, at *** pounds, compared to interim 2024, at *** pounds. [211] As a share to total shipments, the domestic packers' end-of-period inventories were *** percent from 2022 to 2024, but were *** percentage points lower in interim 2025, at *** percent, than in interim 2024, at *** percent.[212]

Similarly, most of the domestic producers' employment-related indicators declined overall from 2022 to 2024, and experienced large declines in interim 2025. Specifically, for U.S. producers, the number of production and related workers ("PRWs"),[213] total hours worked,[214]

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[209] Staff Worksheet, ALT Table C.2. The packers' capacity utilization declined irregularly by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023, before rising slightly to *** percent in 2024; it was *** percentage points lower in interim 2025, at *** percent, compared to interim 2024, at *** percent. *Id.*

[210] Staff Worksheet, ALT Table C.2. Excluding ***, U.S. producers' market share declined by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was *** percentage points lower in interim 2025, at *** percent, than in interim 2024, at *** percent. *Id.*

Separate production data was not collected for independent growers; however, net sales for independent growers declined irregularly by *** percent from 2022 to 2024, falling from *** pounds in 2022 to *** pounds in 2023, before rising slightly to *** pounds in 2024; they were*** percent higher in interim 2025 at *** pounds, than in interim 2024 at *** pounds. CR/PR at Tables 6.4 & C.1.

[211] Staff Worksheet, ALT Table 3.2. The packers' end-of-period inventories fell from *** pounds in 2022 and 2023 to *** pounds in 2024; they were lower in interim 2025, at *** pounds, compared to interim 2024, at *** pounds. *Id.*

[212] Staff Worksheet, ALT Table C.2.

[213] Staff Worksheet, ALT Table C.2. Domestic producers' number of PRWs declined irregularly by *** percent from 2022 to 2024, rising from *** PRWs in 2022 to *** PRWs in 2023, before falling to *** PRWs in 2024; the number of PRWs was *** percent lower in interim 2025, at *** PRWs, than in interim 2024, at *** PRWs. *Id.*

Domestic packers' number of PRWs declined irregularly by *** percent from 2022 to 2024, rising from *** PRWs in 2022 to *** PRWs in 2023, before falling to *** PRWs in 2024; the number of PRWs was *** percent lower in interim 2025, at *** PRWs, than in interim 2024, at *** PRWs. *Id.*

Independent growers' PRWs increased irregularly by *** percent from 2022 to 2024, falling from *** PRWs in 2022 to *** PRWs in 2023, before rising to *** PRWs in 2024; they were *** percent higher in interim 2025, at *** PRWs, than in interim 2024, at *** PRWs. *Id.* at Tables 3.18 & C.1.

[214] Staff Worksheet, ALT Table C.2. U.S. producers' number of total hours worked declined by *** percent from 2022 to 2024, falling from *** hours in 2022 to *** hours in 2023 and *** hours in 2024; they were *** percent lower in interim 2025, at *** hours, than in interim 2024, at *** hours. *Id.*

U.S. packers' number of total hours worked declined by *** percent from 2022 to 2024, falling from *** hours in 2022 to *** hours in 2023 and *** hours in 2024; they were *** percent lower in interim 2025, at *** hours, than in interim 2024, at *** hours. *Id.*

Independent growers' total hours worked declined by *** percent from 2022 to 2024, falling from *** hours in 2022 to *** hours in 2023 and *** hours in 2024; they were *** percent higher in interim 2025, at *** hours, compared to interim 2024, at *** hours. *Id.*

and wages paid[215] all declined overall from 2022 to 2024 and in interim 2025. U.S. packers' productivity declined irregularly by *** percent from 2022 to 2024; it was *** percent higher in interim 2025 than in interim 2024.[216]

Domestic producers' financial indicators were generally worsened during the POI.[217] U.S. producers' gross profits fell by *** percent from 2022 to 2024 and by *** percent in interim 2025.[218] U.S. producers' net income *** in 2024; they also reported a *** in interim 2025.[219] Domestic producers' ratios of operating income to net sales and net income to net sales reflected *** and worsened for the remainder of the POI; they continued to ***.[220]

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[215] Staff Worksheet, ALT Table C.2. U.S. producers' wages paid declined irregularly by *** percent from 2022 to 2024, rising from $*** in 2022 to $*** in 2023, before falling to $*** in 2024; they were *** percent lower in interim 2025, at $***, than in interim 2024 at $***. *Id.*

Domestic packers' wages paid declined irregularly by *** percent from 2022 to 2024, rising from $*** in 2022 to $*** in 2023, before falling to $*** in 2024; they were *** percent lower in interim 2025, at $***, than in interim 2024, at $***. *Id.*

Independent growers' wages paid declined irregularly by *** percent from 2022 to 2024, falling from $*** in 2022 to $*** in 2023, before rising to $*** in 2024; they were *** percent higher in interim 2025, at $***, than in interim 2024, at $***. CR/PR at Tables 3.18 & C.1.

[216] Staff Worksheet, ALT Table C.2. Domestic packers' productivity in pounds per hour declined from 2022 to 2024, falling from *** pounds per hour in 2022 to *** pounds per hour in 2023 and *** pounds per hour in 2024; it was higher in interim 2025, at *** pounds per hour, than in interim 2024, at *** pounds per hour. *Id.*

Independent growers' productivity increased by *** percent from 2022 to 2024, rising from *** pounds per hour in 2022 to *** pounds per hour in 2023 and *** pounds per hour in 2024; productivity was *** percent lower in interim 2025, at *** pounds per hour, than in interim 2024, at *** pounds per hour. CR/PR at Tables 3.18 & C.1.

[217] Staff Worksheet, ALT Table C.2 & ALT Table G.3; CR/PR at Tables 6.4 & C.1.

[218] Staff Worksheet, ALT Table C.2 & ALT Table G.3. U.S. producers' gross profits fell from $*** in 2022 to $*** in 2023 and $*** in 2024; they were $*** in interim 2025, compared to interim 2024, at $***. *Id.*

The packers' gross profits fell by *** percent from 2022 to 2024, declining from $*** in 2022 to $*** in 2023 and $*** in 2024; they were *** percent lower in interim 2025, at $***, compared to interim 2024, at $***. Staff Worksheet, ALT Table C.2 & ALT Table G.1.

[219] Staff Worksheet, ALT Table C.2 & ALT Table G.3. U.S. producers' net income fell from $*** in 2022 to $*** in 2023 and $*** in 2024; they reported *** in interim 2025, at $***, compared to interim 2024, at $***. *Id.*

U.S. packers' net income fell from $*** in 2022 to $*** in 2023 and $*** in 2024; it worsened in interim 2025, at $***, compared to interim 2024, at $***. Staff Worksheet, ALT Table C.2 & ALT Table G.1.

Independent growers' net income rose from $*** in 2022 to $*** in 2023, before falling to $*** in 2024; it was $*** in interim 2025, compared to interim 2024, at $***. CR/PR at Tables 6.4 & C.1.

[220] Staff Worksheet, ALT Table C.2 & ALT Table G.3. U.S. producers' ratio of operating income to net sales declined from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it worsened in interim 2025, at *** percent, compared to interim 2024, at ***. *Id.* U.S. producers ' ratio of net income to net sales fell from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was *** percent in interim 2025, compared to interim 2024, at *** percent. *Id.*
(Continued…)

The domestic packers' capital expenditures declined by *** percent between 2022 and 2024; they were *** percent lower in interim 2025 than in interim 2024.[221] The domestic packers' return on assets fell throughout the POI, declining from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.[222] Similarly, the domestic packers' research and development expenses declined irregularly by *** percent from 2022 to 2024; they were *** percent lower in interim 2025 than in interim 2024.[223]

Based on the record in the preliminary phase of these investigations, we find that the significant volume of subject imports, which increased by *** percent from 2022 to 2024 and by *** percent from interim 2024 to interim 2025, undersold the domestic like product to a significant degree, taking market share from the domestic industry.[224] We also cannot find that subject imports did not suppress domestic prices to a significant degree. As a result, most of the domestic industry's trade, employment, and financial indicators were lower than they would have been but for subject imports. Further, U.S. producers reported several other negative effects of increasing subject imports on their operations, including cancelling or postponing plant expansions, rejection of bank loans and the lowering of their credit rating, and an inability to service debt.[225]

Mushrooms Canada argues that competition is attenuated between the domestic like product and subject imports because subject imports are primarily grown on newer-generation infrastructure, whereas domestic producers primarily use older-generation infrastructure, which, they argue, result in lower, quality, yields, and shelf life, thereby also affecting the availability of fresh mushrooms from producers using older-generation production equipment.[226] Citing ***, Mushrooms Canada asserts that customers prefer fresh mushrooms grown with newer-generation infrastructure.[227] Petitioners have submitted declarations

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U.S. packers' ratio of operating income to net sales fell from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was lower in interim 2025, at *** percent, than in interim 2024, at *** percent. *Id.* The packers' ratio of net income to net sales fell from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; it was lower in interim 2025, at *** percent in interim 2025, compared to interim 2024, at ***. Staff Worksheet, ALT Table C.2 & ALT Table G.1.

Independent growers' ratio of operating income to net sales rose from *** percent in 2022 to *** percent in 2023, before falling to *** percent in 2024; it was higher in interim 2025, at *** percent, compared to interim 2024, at *** percent. CR/PR at Tables 6.4 & C.1. Independent growers' ratio of net income to net sales increased from *** percent in 2022 to *** percent in 2023, before falling to *** percent in 2024; it was higher in interim 2025, at *** percent in interim 2025, compared to interim 2024, at ***. *Id.*

[221] Staff Worksheet, ALT Table C.2. The packers' capital expenditures fell from $*** in 2022 to $*** in 2023 and $*** in 2024; they were lower in interim 2025, at $***, than in 2024, at $***. *Id.*

[222] CR/PR at Table 6.14.

[223] Staff Worksheet, ALT Table C.2. The packers' research and development expenses fell from $*** in 2022 to $*** in 2023, before rising somewhat to $*** in interim 2024; they were $*** in both interim 2025 and interim 2024. *Id.*

[224] Staff Worksheet, ALT Table 3.2.

[225] CR/PR at Tables 6.17-6.19.

[226] Mushroom Canada's Postconference Brief at 5 & 28.

[227] Mushroom Canada's Postconference Brief at Ex. 14; *** U.S. Importer Questionnaire

(Continued…)

disputing that there are significant differences in preferences for the type of infrastructure used and have submitted copies of requests for proposals from major purchasers who did not express a preference for mushrooms grown on a particular type of infrastructure.[228] In any final phase of these investigations, we intend to explore further whether fresh mushrooms grown on older versus newer-generation infrastructure are comparable and the extent to which consumer preferences for fresh mushrooms grown on newer-infrastructure impacts purchasing decisions.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. We recognize that apparent U.S. consumption declined by *** percent from 2022 to 2024 and was *** percent lower in interim 2025, than in interim 2024.[229] This decline does not explain the pervasive underselling of domestic mushrooms by subject imports, nor the market share that subject imports took from domestic industry between 2022 and 2024 and from interim 2024 to interim 2025.[230] Moreover, as discussed above, the record shows that the domestic industry suffered declines in key indicators between 2022 and 2024 that were greater than we would expect in light of the magnitude of the decline in apparent U.S. consumption.[231] Thus, the decline in demand does not explain the injury suffered by the domestic industry that we have found to be caused by subject imports.

We have also considered the role of nonsubject imports in these investigations. U.S. shipments of nonsubject imports were relatively small and declined by ***[232] percent between 2022 and 2024, while the market share of nonsubject imports was small (ranging from *** percentage points in 2022 to *** percentage points in 2024) and declined by *** percentage points over that period.[233] They were *** percent lower in interim 2025 than in interim 2024,[234] and their market share declined by *** percent during that period.[235] Thus,

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Response at Additional Explanation at 9-11. The purchaser questionnaire response from ***, however, did not mention a preference for mushrooms grown on newer-generation infrastructure. *See* ***, EDIS Doc. No. 863637 (Sept. 25, 2025).

[228] Petitioners' Postconference Brief at Ex.7 (Carroll Dec.) & Attachment 1; *id.* at Ex. 10 (Ciarrocchi Dec.).

[229] CR/PR at 4.5 & Tables 4.5; Staff Worksheet, ALT Table C.2.

[230] Staff Worksheet, ALT Table C.2. From 2022 to 2024, subject imports gained *** percentage points of market share at the expense of the domestic industry, which lost *** percentage points. *Id.* Similarly, in interim 2025, subject imports gained *** percentage points of market share at the expense of the domestic industry, which lost *** percentage points of market share during that period. *Id.*

[231] Staff Worksheet, ALT Table C.2.

[232] *Derived from* CR/PR Table 4.2. U.S. shipments of nonsubject fell from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024; they were lower in interim 2025, at *** pounds, than in interim 2024, at *** pounds. *Id.*

[233] CR/PR at Table C.2. As a percentage of total imports, nonsubject imports declined by *** percentage points from 2022 to 2024; it was *** percentage points lower in interim 2025, at *** percent, than in interim 2024, at ***. *Id.* at Table 4.2.

[234] *Derived from* CR/PR at Table 4.2.

[235] CR/PR at ALT Table C.2.

nonsubject imports do not explain the domestic industry's loss of market share during the POI and the accompanying decline in its performance discussed above.[236]

In sum, based on the record in the preliminary phase of these investigations, we conclude that subject imports had a significant impact on the domestic industry.

VII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of fresh mushrooms from Canada that are allegedly subsidized and sold in the United States at less than fair value.

[236] Mushrooms Canada argues that subject imports have filled a gap in the market that was caused by a phorid fly infestation in Southeastern Pennsylvania's mushroom farms. Mushrooms Canada's Postconference Brief at 17-23 & Ex. 18 ***. As discussed in Section IV.B.2 above, U.S. packers had substantial excess capacity during the POI that was as high as *** pounds in 2023, and Petitioners provided evidence that indicates phorid flies have been an issue for years. Nevertheless, we intend to look further at this issue in any final phase of these investigations.

In addition, Mushrooms Canada asserts that there is inadequate domestic supply on the West Coast and that subject imports have increased because Canada is closer in proximity to the West Coast than Pennsylvania where many domestic fresh mushroom farms are located. Mushrooms Canada Postconference Brief at 37-39. It relies on questionnaire responses from importers of subject merchandise indicating that they sell to the West Coast and United States Department of Agriculture Agricultural Marketing Service ("AMS") data indicating that fresh mushroom prices are low in the Philadelphia Terminal Market despite subject imports being absent from that market. *Id.* at 38 (citing *id.* at Ex. 13). Although we have noted in Section IV.B.2 above that ***, the AMS data does not demonstrate insufficient domestic supply on the West Coast. Further, record evidence indicates that there are more than double the number of U.S. producers in the Pacific Coast and Mountain regions than subject importers, that California has the second-highest production of *Agaricus* mushrooms in the United States, and that both U.S. producers and importers make a sizeable number of sales to areas that are over 1,000 miles away from the producers' production facility or importers' port of entry. CR/PR at 2.3, 3.14, Table 2.3 & Table 3.10. We intend to explore whether there are differences in fresh mushroom prices and supply in different regions of the United States in any final phase of these investigations.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by the Fresh Mushrooms Fair Trade Coalition and its individual members ("Petitioners")[1] on September 16, 2025, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value ("LTFV") imports of fresh mushrooms[2] from Canada. Table 1.1 presents information relating to the background of these investigations.[3] [4]

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

Effective date	Action
September 16, 2025	Petitions filed with Commerce and the Commission; institution of the Commission investigations (90 FR 45245, September 19, 2025)
November 17, 2025	Revised scheduling of Commission investigations (90 FR 52094, November 19, 2025)
November 21, 2025	Commission's conference
January 15, 2025	Commission's vote
January 16, 2025	Commission's determinations
January 22, 2025	Commission's views

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

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—

[1] The individual members of the Fresh Mushrooms Fair Trade Coalition are: Giorgio Fresh Co. (including Donna Bella Farms LLC and Giorgi Mushroom Co.); J-M Farms LLC; Kennett Square Mushroom Operation LLC; Modern Mushroom Farms, Inc.; Needham's Mushroom Farms, Inc.; and Sher-Rockee Mushroom Farms.

[2] See the section entitled "The subject merchandise" in Part 1 of this report for a complete description of the merchandise subject in this proceeding.

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

[4] A list of witnesses appearing at the conference is presented in appendix B of this report.

> 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—[5]

> 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, 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—[6]

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

(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 1 of this report presents information on the subject merchandise, alleged subsidy rates/dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 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

Fresh mushrooms are generally used in culinary applications, either as an ingredient in other dishes or as a main course. Fresh mushrooms are grown by growers, who may or may not be affiliated with or related to packaging firms ("packers") that package the fresh mushrooms into individual containers (or into larger packages for food distributors) for shipment.[7] Leading U.S. packers of fresh mushrooms are Giorgio, Monterey, and Phillips, while leading unaffiliated growers include Modern Mushroom, Kennett Square, and Sher-Rockee. Leading producers of fresh mushrooms in Canada (who may also be independent growers or affiliated grower/packer firms) include Highline, Champs, and Farmers' Fresh. The leading U.S. importers of fresh mushrooms from Canada are Champ's, Highline, and Farmers' Fresh. The vast majority of U.S. imports of fresh mushrooms come from Canada; only *** reported imports of fresh mushrooms from nonsubject sources (***). U.S. purchasers of fresh mushrooms are large grocery store chains or distributors; leading purchasers include ***.

Apparent U.S. consumption of fresh mushrooms totaled approximately *** pounds ($***) in 2024. U.S. producers' U.S. shipments of fresh mushrooms totaled *** pounds ($***) in 2024, and accounted for *** percent of apparent

[7] Counsel for Petitioners and the Canadian Mushroom Growers' Association both indicated that the number of firms that are solely packers without affiliated growing operations is small. Conference transcript, p. 50 (Herrmann), and p. 199 (Porter).

U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** pounds ($***) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** pounds ($***) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C.1. The Commission's questionnaires collected data for the years 2022 to 2024 and interim periods January through June of 2024 ("interim 2024") and January through June of 2025 ("interim 2025"). Except as noted, U.S. industry data are based on questionnaire responses of eight packers that accounted for approximately *** percent of U.S. production of fresh mushrooms during 2024, as well as four additional growers. U.S. imports are based on questionnaire responses of eight firms that accounted for *** percent of subject imports in 2024. Foreign industry data are based on questionnaire responses of 12 firms that accounted for *** percent of fresh mushrooms production in Canada in 2024.

Previous and related investigations

Fresh mushrooms have not been the subject of any prior countervailing or antidumping duty investigations in the United States. However, certain preserved mushrooms have been the subject of prior antidumping duty investigations. On January 6, 1998, antidumping duty petitions against certain preserved mushrooms from Chile, China, India, and Indonesia were filed with Commerce and the Commission. On October 22, 1998, Commerce determined that imports of preserved mushrooms from Chile were being sold at LTFV and on December 31, 1998, determined that imports of preserved mushrooms from China, India, and Indonesia were being sold at LTFV. The Commission determined on November 25, 1998, that the domestic industry was materially injured by reason of LTFV imports of preserved mushrooms from Chile, and on February 11, 1999, determined that the domestic industry was materially injured by reason of LTFV imports of preserved mushrooms from China, India, and Indonesia. On December 2, 1998, Commerce issued its antidumping duty order on imports of preserved mushrooms from Chile, and on February 19, 1999, issued antidumping duty orders on imports of preserved mushrooms from China, India, and Indonesia. Following affirmative determinations in first, second, third, and fourth five-year reviews by Commerce and the

Commission, Commerce issued a continuation of the antidumping duty orders on imports of preserved mushrooms from Chile, China, India, and Indonesia.

Certain preserved mushrooms from France, the Netherlands, Poland, and Spain have also been the subject of antidumping duty investigations in the United States (though with a weight limit provision in the scope that is absent from the above-described investigations). On March 31, 2022, antidumping duty petitions against certain preserved mushrooms from France, the Netherlands, Poland, and Spain were filed with Commerce and the Commission. On November 28, 2022, Commerce determined that imports of preserved mushrooms from France were being sold at LTFV and on March 27, 2023, determined that imports of preserved mushrooms from the Netherlands, Poland, and Spain were being sold at LTFV. The Commission determined on January 12, 2023, that the domestic industry was materially injured by reason of LTFV imports of preserved mushrooms from France, and on May 11, 2023, determined that the domestic industry was materially injured by reason of LTFV imports of preserved mushrooms from the Netherlands, Poland, and Spain. On January 19, 2023, Commerce issued its antidumping duty order on imports of preserved mushrooms from France, and on May 23, 2023, issued antidumping duty orders on imports of preserved mushrooms from the Netherlands, Poland, and Spain. These orders have not yet been subject to a five-year review since their issuance.[8]

Nature and extent of alleged subsidies and sales at LTFV

On November 14, 2025, Commerce issued a memorandum stating that as a result of the cessation of government operations it would be tolling certain deadlines in antidumping duty and countervailing duty proceedings by 47 days.[9] Commerce subsequently issued a second memorandum stating that it would toll its deadlines by a further 21 days.[10] Therefore, Commerce has not yet initiated its corresponding antidumping duty and countervailing duty investigations as of the time of the issuance of this report.

[8] Information presented in this section was obtained from Certain Preserved Mushrooms from France (Final), USITC Publication 5393, January 2023, and Certain Preserved Mushrooms from the Netherlands, Poland, and Spain (Final), USITC Publication 5430, May 2023.

[9] Commerce Memorandum, ‘‘Deadlines Affected by the Shutdown of the Federal Government,’’ dated November 14, 2025 (First Tolling Memo).

[10] Commerce Memorandum, ‘‘Tolling of all Case Deadlines,’’ dated November 24, 2025 (Second Tolling Memo).

The subject merchandise

In the current proceeding, Petitioners have requested that Commerce adopt the following scope:[11]

> The merchandise covered by these investigations is fresh mushrooms of the genus *Agaricus* ("fresh mushrooms"). This includes – but is not limited to – fresh mushrooms of the species *Agaricus* bisporus, which are commonly referred to as button mushrooms, chestnut mushrooms, cremini or crimini mushrooms, baby bellas, portabella or portobello mushrooms, table mushrooms, or as white or browns. Fresh mushrooms include whole mushrooms, as well as mushrooms that have been sliced, diced, or separated into stems and pieces prior to importation. Fresh mushrooms may also be imported in bulk or loose form, or may be imported in individual containers packaged for retail sale. The scope of these investigations includes all fresh mushrooms of the genus *Agaricus*, whether or not organic, and irrespective of age, cut, color, size, species, or packaging.
>
> Subject merchandise may be cleaned, washed, inspected, subjected to metal detection, sliced, diced, or de-stemmed, and/or vacuum cooled prior to importation, but otherwise undergoes minimal further processing. The scope of these investigations covers fresh mushrooms of the genus *Agaricus* regardless of end use, including both mushrooms destined for the fresh market and mushrooms intended for food processing.

[11] Petition, p. 6. As stated above, Commerce has not yet initiated its corresponding antidumping duty and countervailing duty investigations as of the time of the issuance of this report.

Tariff treatment

Based upon the scope contained in the petition, information available to the Commission indicates that the merchandise subject to these investigations are currently imported under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting number 0709.51.0100. The general rate of duty is 8.8 cents/kilogram plus 20 percent for HTS subheading 0709.51.01.[12] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Pursuant to the United States-Mexico-Canada Agreement ("USMCA"), originating goods of Canada under HTS general note 11 (i.e., those grown, cultivated, harvested, picked or gathered in the territory of Canada, even if grown from seed, bulbs, rootstock, cuttings, slips or other live parts of plants imported from a non-USMCA country) are eligible for duty-free entry.[13]

Tariffs initiated under the International Emergency Economic Powers Act ("IEEPA")[14]

Effective March 4, 2025, fresh mushrooms originating in Canada were subject to an additional 25 percent ad valorem duty under IEEPA. Effective March 7, 2025, products originating in Canada that enter with duty free treatment under the USMCA are no longer subject to the additional ad valorem duty under IEEPA.[15]

[12] The subject merchandise in this proceeding is imported under HTS statistical reporting number 0709.51.0100. USITC, HTS (2025) Revision 30, November 2025, pp. 7.15.

[13] See HTS general note 11 subdivisions (a)(i) and (b) for more details on duty treatment for goods originating from the territory of a USMCA country, accompanied by definitions provided in subdivisions (l)(iv)(2) and (n)(iii). USITC, HTS (2025) Revision 30, November 2025, pp. GN.28 to GN.29, GN.44, GN.49.

[14] Multiple tariffs have been enacted under the authority of the International Emergency Economic Powers Act ("IEEPA"). Tariffs specific to Canada, China, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs specific to India were initiated in August 2025. Tariffs under IEEPA have been amended over time. We note that the applicable IEEPA tariffs are currently subject to ongoing litigation. *V.O.S. Selections Inc., v. Trump,* No. 15-1812, 2025 WL 2490634 (Fed. Cir. Aug. 29, 2025) (*en banc*) (holding that IEEPA does not authorize these tariffs), *petition for cert. filed* (Sept. 3, 2025) (No. 25-250).

[15] 90 FR 9113, February 7, 2025; 90 FR 9183, February 10, 2025; 90 FR 11785, March 11, 2025; 90 FR 37957, August 6, 2025. See also HTS headings 9903.01.10, 9903.01.14, and 9903.01.15 and U.S. notes 2(j) and 2(l) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 30, November 2025, pp. 99.3.2 to 99.3.3, 99.3.343 to 99.3.344.

Fresh mushrooms originating in Canada are not subject to tariffs initiated in April 2025 under IEEPA.[16]

The product

Description and applications[17]

The merchandise covered by these investigations is fresh mushrooms of the genus *Agaricus*, which includes the species *Agaricus bisporus* and *Agaricus campestris* among its most prominent members. *Agaricus bisporus* is commonly known as the cultivated mushroom and can frequently be referred to as a baby bella mushroom, button mushroom, chestnut mushroom, cremini or crimini mushroom, portabella or portobello mushroom, or table mushroom. *Agaricus bisporus* is the dominant edible mushroom in the United States and is widely grown throughout North America and Europe due to its versatility, ease of cultivation, and relatively high yield. *Agaricus campestris* is commonly known as the field mushroom, and—while also edible—is not grown commercially as a result of its quick maturity period and short shelf life. The merchandise covered by these investigations may be cleaned, washed, inspected, subjected to metal detection, sliced, diced, destemmed, and/or vacuum cooled prior to importation, but otherwise undergoes minimal additional processing.

In their immature state, fresh *Agaricus* mushrooms typically measure one to four inches in cap diameter, and may be white (e.g., button mushrooms and table mushrooms) or brown (e.g., chestnut mushrooms and cremini mushrooms). In their mature state, fresh *Agaricus* mushrooms typically measure four to six inches in cap diameter, and are almost always brown (e.g., portabella mushrooms). Mushrooms of the genus *Agaricus* are typically found with a purple-brown spore print on the cap and have lamellae—colloquially known as the gills under the mushroom's cap—that are not directly attached to the stem; the gills are initially pink or cream when the mushroom is young, but turn very dark in color as it matures.[18] As a foodstuff, fresh *Agaricus* mushrooms are known for their mild flavor, firm texture, and nutritional value,

[16] Imports originating in Canada were exempt from tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 and 9903.01.26 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 30, November 2025, pp. 99.3.5 to 99.3.25, 99.3.345.

[17] Unless otherwise noted, this information is based on the Petition, pp. 6 to 8.

[18] Identic Pty Ltd, Brisbane (Identic) and Australian Biological Resources Study, Canberra (ABRS), "Agaricus," https://data.rbg.vic.gov.au/dev/fungikeys/funkey/key/Funkey%20-%20Key%20to%20the%20Agarics%20of%20Australia/Media/Html/Fact%20Sheets/Agaricus.htm#, accessed November 17, 2025.

with the common varieties (i.e., button, cremini, and portabella) often have a strong umami flavor and meaty texture when cooked.[19] Although brown and/or mature varieties may feature a more intense flavor and a firmer texture than white and/or immature varieties, all fresh *Agaricus* mushrooms possess similar physical characteristics, and are generally substitutable with one another in culinary applications.

The scope of these investigations includes all fresh mushrooms of the genus *Agaricus*, whether or not organic, and irrespective of age, cut, color, size, species, or packaging. The in-scope merchandise may be sliced or diced prior to importation, may be separated into stems and pieces, or may enter as whole mushrooms. The in-scope merchandise may be packed into individual containers for retail sale prior to importation or may enter in bulk or loose form.

The overwhelming majority of fresh *Agaricus* mushrooms sold in the U.S. market are packaged into individual containers and shipped to convenience stores, grocery stores, retail chains, and supermarkets. Larger packages of fresh *Agaricus* mushrooms may also be sold to food distributors for use in cafeterias, delis, and restaurants. Customers typically use fresh *Agaricus* mushrooms in culinary applications, either as an ingredient in other dishes or as a main course unto themselves. Although fresh *Agaricus* mushrooms can be consumed raw for fresh applications like salads, they are often sautéed, roasted, or grilled to tenderize them and bring out stronger flavors.[20] A smaller portion of fresh *Agaricus* mushrooms sold in the U.S. market are distributed in bulk or loose form to food processors, which incorporate the merchandise into various downstream products (e.g., dried mushrooms, frozen mushrooms, preserved mushrooms, and prepared food items). In 2024, nearly 88 percent of total U.S. sales of *Agaricus* mushrooms, measured by volume, were sold in the fresh market, while the remaining 12 percent of total sales were in mushrooms sent for further processing.[21] The scope of these investigations covers fresh *Agaricus* mushrooms regardless of end use and includes both mushrooms destined for the fresh market and mushrooms intended for food processing.

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[19] Mushroom Council, "Crimini," https://www.mushroomcouncil.com/mushroom-101/varieties/crimini/, accessed November 17, 2025; Mushroom Council, "Portabella," https://www.mushroomcouncil.com/mushroom-101/varieties/portabella/, accessed November 17, 2025; Mushroom Council, "White Button," https://www.mushroomcouncil.com/mushroom-101/varieties/white-button/, accessed November 17, 2025.

[20] Ibid.

[21] U.S. Department of Agriculture (USDA), National Agricultural Statistics Service (NASS), *Mushrooms, Agaricus – Sales, Measured in LB*, *Mushrooms, Agaricus, Fresh Market – Sales, Measured in LB*, *Mushrooms, Agaricus, Processing – Sales, Measured in LB*, https://quickstats.nass.usda.gov/, accessed November 17, 2025.

Manufacturing processes[22]

The cultivation of fresh *Agaricus* mushrooms begins with compost, a nutrient-rich substrate that improves fertility and facilitates growth of mycelia (i.e., mushroom spawn).[23] The compost is formed by wetting, mixing, and aerating its constituent ingredients in an industrial turner. These ingredients may be natural or synthetic and commonly include straw-bedded horse manure and hay or wheat straw.[24] Nitrogen supplements—such as chicken manure, corncobs, cottonseed meal, cocoa bean hulls, soybean meal, brewer's grain, and urea—may be added to the compost via topdressing once the mixing process is complete.[25] Gypsum may also be added to buffer the compost's pH level and prevent the straws from sticking together and obstructing air penetration.[26] The compost is then stacked into large piles and allowed to ferment for up to two weeks. After this phase is complete, the compost is pasteurized and sterilized to kill bacteria, remove pests, and eliminate any soluble ammonia formed during fermentation. Note that this is not a complete sterilization of the compost, but rather a selective elimination of organisms and chemical compounds that will likely compete for food or are toxic to the mushroom, while also minimizing the loss of useful microbes.[27] Composting can take anywhere from 10 to 31 days to complete, at minimum.[28]

Once the compost is finished, it is layered into large horizontal racks (i.e., compost beds) inside of a grow room, which is a specialized structure designed to control light, airflow, temperature, and humidity. In a process known as spawning, the compost is inoculated with evenly distributed mycelia that is either broadcasted over the surface of the compost beds, "ruffled in" slightly under the compost's surface, or mixed in using specially designed

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[22] Unless otherwise noted, this information is based on the Petition, pp. 8 to 10.

[23] Mycelia, commonly referred to as mushroom spawn, are the vegetative root-like structure of a fungus that is placed into a substrate to expand and absorb nutrients. Eventually, the mycelium undergoes a fruiting process, which produces the edible fruit of the fungus known as the mushroom. Spawn strains are developed in isolated environments and sold to mushroom growers in large volumes. Growing facilities receive spawn in regular shipments, which are stored in coolers upon receipt to ensure the spawn's freshness. R&R Cultivation, "The Science Behind Mushroom Growth: An In-Depth Look," https://rrcultivation.com/blogs/mn/the-science-behind-mushroom-growth?srsltid=AfmBOorx_Fbb9MGD17z43wxeL0k3aOEhHP6g55nS2cyeTMCsy9SWTvHp, accessed December 5, 2025; Conference transcript, pp. 119 to 122 (Jurgensmeyer, Carroll).

[24] Pennsylvania State University, "Basic Procedures for Agaricus Mushroom Growing," https://extension.psu.edu/basic-procedures-for-agaricus-mushroom-growing, accessed December 5, 2025.

[25] Ibid.

[26] Ibid.

[27] Ibid.

[28] Ibid.

mechanized equipment that may be available at commercial farms.[29] All equipment used must be thoroughly cleaned and disinfected before spawning to prevent damaging the mycelia.[30] Compost beds are maintained at a temperature of approximately 75 to 77° F with high relative humidity to minimize drying of the substrate surface.[31] The mycelia are allowed to colonize the substrate for up to three weeks, although the time needed for the mycelia to colonize the compost before any fruiting can occur depends on the spawning rate and distribution of mycelia, the compost's moisture and temperature, and the type or quality of compost used.[32]

Following the spawning process, an additional layer of soil, limestone, peat moss, and/or recycled compost is uniformly applied on the surface of the substrate with mycelia. Commonly referred to as the casing layer, it acts as a water reserve in which larger mycelia can form and eventually begin fruiting.[33] The temperature is held at approximately 75° F for an additional five days, and is then gradually lowered until pins (i.e., immature mushrooms) appear.[34]

As the pins emerge above the casing, fresh air is introduced into the environment in order to reduce the concentration of carbon dioxide and thereby encourage further growth. Ensuring uniform air circulation within the grow room—which is maintained at 60–66° F during the pinning stage—is important to prevent stale air and improve the mushroom's freshness.[35] The timeframe from pinning to cropping is contingent on the variety of mushrooms at issue. Larger varieties such as portabella mushrooms may take nearly two weeks to develop fully, while smaller varieties such as cremini mushrooms may take only four days to sprout. The Rapidly Expanding State, which is when the mushroom doubles in size every 24 hours, is the most critical state of the mushroom's development; during this stage, quality and yield of the crop can depend on temperature, moisture of the compost, and the casing layer.[36]

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[29] Pennsylvania State University, "Spawning to Casing in Commercial Mushroom Production," https://extension.psu.edu/spawning-to-casing-in-commercial-mushroom-production, accessed December 5, 2025.

[30] Pennsylvania State University, "Basic Procedures for Agaricus Mushroom Growing," https://extension.psu.edu/basic-procedures-for-agaricus-mushroom-growing, accessed December 5, 2025.

[31] Ibid.

[32] Ibid.

[33] Ibid.

[34] Note, however, that there is no uniform consensus on the best practices during the casing process, leading to variation among growers in casing-management practices and materials used for the casing layer. Ibid.

[35] Ibid.

[36] Ibid.

Once the mushrooms have matured to a sufficient degree, they are harvested in recurring three-to-five-day windows known as flushes or breaks.[37] Once the mature mushrooms are picked during a flush, the remaining mushrooms are allowed to mature in time for another flush.[38] The first two flushes generally account for most of the total harvest, as the yield often tapers with each subsequent flush.[39] Overall, the harvesting period lasts roughly seven to ten days, with growers typically expecting three to four flushes per crop cycle.[40] This harvesting may occur by hand, or it may be automated through mechanical means; harvesting rates can vary from 30 to 80 lb./hour, largely depending on the amount of harvestable crop on the compost beds and the size of the mushrooms.[41]

According to the Respondents, growing facilities can be divided between "old-generation" and "new-generation" farms, with key differences in the production process separating the two. For example, old-generation growing facilities typically use wooden composting beds to grow mushrooms, while new-generation farms use non-porous metal shelving units to reduce the risk of pathogen buildup.[42] Furthermore, new-generation growing facilities often incorporate more technology and automation in the growing process; this can include computerized environmental control systems—such as with HVAC systems—and robotic harvesting methods.[43] The Respondents noted that new-generation growing facilities also provide more consistent growing conditions and better protection against pests and disease vectors, such as phorid flies.[44] As a result, the Respondents claimed that mushrooms produced by new-generation farms have a higher quality, cleaner appearance, longer shelf life, and a more consistent supply, while the Petitioners asserted that there are no such differences between mushrooms produced at the two types of facilities.[45] Note that new-generation growing facilities are found in both the United States and Canada; however, the Respondents

[37] Mushroom maturity is evaluated not by its size, but by how open the veil is under the mushroom's cap. Mature mushrooms can accordingly be either large or small. Ibid.

[38] Ibid.

[39] Ibid.

[40] Ibid.

[41] Pennsylvania State University, "Basic Procedures for Agaricus Mushroom Growing," https://extension.psu.edu/basic-procedures-for-agaricus-mushroom-growing, accessed December 5, 2025.

[42] Conference transcript, pp. 146 to 147 (Carroll, Macleod).

[43] Conference transcript, pp. 147 to 148 (Macleod).

[44] Ibid.

[45] Conference transcript, pp. 11, 53, and 142 to 143 (Herrmann, Carroll, Macleod).

highlighted that about 90 percent of Canadian mushroom production is done on new-generation farms, compared to the roughly 25 percent of production in the United States.[46]

The harvested mushrooms are then shipped from the growing location to the packing location. Transportation and storage require a highly controlled environment—including a complete cold chain—to maintain adequate freshness and limit bacterial growth. The mushrooms are washed and undergo an extensive quality assurance process to ensure they meet relevant standards. The mushrooms may be sorted, such that lower quality mushrooms intended for food processing are separated from higher quality mushrooms destined for the fresh market. Finally, the mushrooms are packed for shipment to the final customer, either into smaller containers for retail sale or into larger containers for food service distribution. Fresh mushrooms are packed and shipped either the same day they are harvested or the following day.[47] Fresh *Agaricus* mushrooms have an average shelf life of 12 days, so they must be harvested, packaged, and transported within that timeframe.[48]

Domestic like product issues

The Commission's decision regarding the appropriate domestic product(s) that are "like" the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price.

Petitioners argue that the Commission should find that the domestic like product mirrors the scope and consists of fresh *Agaricus* mushrooms.[49] Respondents agree that the definition of the like product should mirror the scope language in the petition.[50] U.S. producers and importers were asked to compare in-scope fresh mushrooms to all other out-of-scope fresh mushrooms on the basis of the factors described above. Summary information regarding these responses is presented in table 1.2 below.[51]

[46] Conference transcript, pp. 234 (Porter).
[47] Conference transcript, pp. 62 and 89 (Carroll, Jurgensmeyer).
[48] Conference transcript, pp. 89 and 114 (Carroll).
[49] Petitioners' postconference brief, p. 4.
[50] Canadian Mushroom Growers' Association's postconference brief, p. 1.
[51] Narrative responses accompanying these comparisons are presented in appendix D.

Table 1.2 Fresh mushrooms: Count of firms' responses regarding the comparability of in-scope *Agaricus* genus fresh mushrooms to out-of-scope fresh mushrooms, by item and firm type

Count in number of firms reporting

Item	Firm type	Fully	Mostly	Somewhat	Never
Physical characteristics	U.S. producers	0	0	1	10
Interchangeability	U.S. producers	0	0	1	10
Channels	U.S. producers	0	1	2	8
Manufacturing	U.S. producers	0	0	2	9
Perceptions	U.S. producers	0	0	1	10
Price	U.S. producers	0	0	1	10
Physical characteristics	Importers	0	0	3	4
Interchangeability	Importers	0	0	2	5
Channels	Importers	2	2	3	0
Manufacturing	Importers	0	0	2	5
Perceptions	Importers	0	0	3	4
Price	Importers	0	0	3	4

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

Note: “U.S. producers” is inclusive both of “growers”, i.e., independent growers who do not perform their own packing/packaging, and “packers” that package and ship fresh mushrooms using product that they grew themselves, or acquired from affiliated growers and/or unaffiliated growers. (See Part 3 for more information.)

Part 2: Conditions of competition in the U.S. market

U.S. market characteristics

Most fresh mushrooms are sold in individual containers and shipped to convenience stores, grocery stores, retail chains, and supermarkets and in larger packages to food distributors for use in cafeterias, delis, and restaurants. The ultimate consumer uses fresh mushrooms as an ingredient or main dish.[1] There are generally three different channels of distribution, which all require different levels of quality: retail, food service, and further processing (or "soup-grade"). If higher quality mushrooms are not sold on the retail or food service levels, they may be sold as soup-grade, even if they are of much higher quality, and soup-grade mushrooms may end up simply discarded.[2] U.S. producers are able to produce both organic or conventional fresh mushrooms, depending on their compost and soil inputs.[3] For example, U.S. producer Giorgi has dedicated grow rooms and packing lines for organic mushrooms.[4] Fresh mushrooms are generally harvested and shipped within 24 hours, and lead times are very important to maintain freshness.[5]

Three of eight U.S. producer packagers[6] and six of eight importers indicated that the market was subject to distinctive conditions of competition. Specifically, U.S. producer *** reported that shelf life is a critical factor in the industry, stating that fresh mushrooms generally have a maximum of seven days of marketable quality after transportation[7] and U.S. producer *** reported that quality and fill rates are paramount. Additionally, Respondents state that the appearance, quality, and shelf life of fresh mushrooms is very important to consumers.[8]

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[1] Petition, p. 8.

[2] Conference transcript, pp. 34-35, 84-85 (Moule, Jurgensmeyer).

[3] Respondents stated that most organic fresh mushrooms are sold to the retail sector and that all major retailers have an organic offering and that the change in customer requirements for organic over conventional fresh mushrooms has been driven by big box stores. Respondents stated that the food service sector is dominated by conventional mushroom offerings, and that the market for fresh mushrooms for further processing has seen a slight increase in preference for organic mushrooms. Respondent postconference brief, Answers to Staff Questions, p. 24.

[4] Conference transcript, pp. 80-81, 103-104 (Carroll, Shelton).

[5] Conference transcript, p. 62 (Carroll).

[6] The U.S. industry is comprised of growers and packagers. References in Part 2 to U.S. producers include only packagers unless otherwise noted.

[7] Shipments from Pennsylvania (where most U.S. production occurs) generally require 3-4 days in transit. U.S. producer *** questionnaire, IV-17.

[8] Conference transcript, p. 142-143 (Macleod).

Respondents argue that there is an important difference between the fresh mushrooms produced in old generation farming infrastructure used by many U.S. producers and the new generation farming infrastructure that is used by many Canadian producers. Fungal diseases and bacterial diseases can compromise the appearance and overall health of the fresh mushrooms, and phorid flies are a common vector for these diseases.[9] Respondents argue that newer infrastructure helps to prevent the spread of fungal and bacterial diseases that can compromise the health and appearance of mushrooms.[10] Additionally, Respondents argue that new-generation infrastructure farms consistently produce a high volume of fresh mushrooms with uniform appearance and long shelf lives.[11]

Apparent U.S. consumption of fresh mushrooms decreased during 2022 and 2024 and apparent U.S. consumption in January through June 2024 was lower than in interim 2025.

Impact of new or modified tariffs

U.S. producers and importers were asked to report the impact of new or modified tariffs on overall demand, supply, prices, or raw material costs (table 2.1).

Table 2.1 Fresh mushrooms: Count of firms' responses regarding the impact of the new or modified tariffs

Firm type	Yes	No	Don't know
U.S. packagers	2	6	—
Importers	5	2	1

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

Channels of distribution

U.S. producers and importers sold mainly to retailers and grocery stores with substantial shares of their remaining sales going to distributors and wholesalers, as shown in table 2.2.

[9] Conference transcript, p. 144 (Macleod).

[10] Conference transcript, pp. 143-145 (Macleod).

[11] Conference transcript, p. 166 (McLean); Respondent's postconference brief, pp. 1-2.

Table 2.2 Fresh mushrooms: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January through June

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors / wholesalers	***	***	***	***	***
United States	Retailers / grocery stores	***	***	***	***	***
United States	Commercial end users	***	***	***	***	***
United States	Non-commercial end users	***	***	***	***	***
Canada	Distributors / wholesalers	***	***	***	***	***
Canada	Retailers / grocery stores	***	***	***	***	***
Canada	Commercial end users	***	***	***	***	***
Canada	Non-commercial end users	***	***	***	***	***
Nonsubject	Distributors / wholesalers	***	***	***	***	***
Nonsubject	Retailers / grocery stores	***	***	***	***	***
Nonsubject	Commercial end users	***	***	***	***	***
Nonsubject	Non-commercial end users	***	***	***	***	***
All imports	Distributors / wholesalers	***	***	***	***	***
All imports	Retailers / grocery stores	***	***	***	***	***
All imports	Commercial end users	***	***	***	***	***
All imports	Non-commercial end users	***	***	***	***	***

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 “—“.

Geographic distribution

U.S. producers and importers reported selling fresh mushrooms to all regions in the contiguous United States (table 2.3). For U.S. producers, 22.7 percent of sales were within 100 miles of their production facility, 57.3 percent were between 101 and 1,000 miles, and 19.9 percent were over 1,000 miles. Importers sold 8.8 percent within 100 miles of their U.S. point of shipment, 61.1 percent between 101 and 1,000 miles, and 30.1 percent over 1,000 miles.

Table 2.3 Fresh mushrooms: Count of U.S. producers' and U.S. importers' geographic markets

Region	Combined U.S. producers	Canada
Northeast	5	3
Midwest	6	3
Southeast	5	2
Central Southwest	6	2
Mountains	7	3
Pacific Coast	7	3
Other	2	1
All regions (except Other)	5	1
Reporting firms	8	6

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

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

The U.S. industry is concentrated in Pennsylvania, but there are smaller growers throughout the United States. Petitioners stated that they have transportation solutions that allow for long-distance transportation, including refrigerated trucks and team drivers, that can generally get fresh mushrooms to their customers in the West within two and a half days.[12] Respondents stated that demand for their fresh mushrooms from Canada has been increasing due to West Coast mushroom growing facility closures and the proximity of Canadian growing operations to West Coast customers.[13]

Supply and demand considerations

U.S. supply

Table 2.4 provides a summary of the supply factors regarding fresh mushrooms from U.S. packagers and from Canada.

[12] Conference transcript, p. 75 (Shelton).

[13] Conference transcript, p. 164 (McLean).

Table 2.4 Fresh mushrooms: Supply factors that affect the ability to increase shipments to the U.S. market, by country

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

Factor	Measure	United States	Canada
Capacity 2022	Quantity	***	***
Capacity 2024	Quantity	***	***
Capacity utilization 2022	Ratio	***	***
Capacity utilization 2024	Ratio	***	***
Inventories to total shipments 2022	Ratio	***	***
Inventories to total shipments 2024	Ratio	***	***
Home market shipments 2024	Share	***	***
Non-US export market shipments 2024	Share	***	***
Ability to shift production	Count	***	***

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

Note: Responding U.S. producers accounted for more than three-quarters of U.S. production of fresh mushrooms in 2024. Responding foreign producer/exporter firms accounted for virtually of U.S. imports of fresh mushrooms from Canada during 2024. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from Canada, please refer to Parts 3 and 7.

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 "—".

Domestic production

Based on available information, U.S. producers of fresh mushrooms have the ability to respond to changes in demand with moderate changes in the quantity of shipments of U.S.-produced fresh mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply is that there is some available unused capacity for additional production and limited ability to shift production and packing to or from other products. Factors mitigating responsiveness of supply include virtually no ability to shift from alternate markets or inventories. Other products that producers reportedly can produce on the same equipment as fresh mushrooms are out-of-scope exotic mushrooms such as shiitake and oyster mushrooms. U.S. packers reported that it is possible to pack exotic mushrooms and in-scope agaricus mushrooms on the same equipment, but some noted that because the demand for exotic mushrooms is so much lower than demand for in-scope mushrooms, the cost of packaging would be prohibitive.

Some growers have scaled back production because they have not been able to sell their supply. For example, both Modern Mushrooms and Kennett Square Mushroom Operations ("KSMO") were asked by their packers, that are generally contracted to purchase all of a grower's supply, to scale back on their production since 2023.[14]

[14] Conference transcript, pp. 31, 34 (Ciarrocchi, Moule).

Subject imports from Canada

Based on available information, producers of fresh mushrooms from Canada have the ability to respond to changes in demand with moderate changes in the quantity of shipments of fresh mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply is that there is some available unused capacity for additional production and limited ability to shift production and packing to or from other products. Factors mitigating responsiveness of supply include virtually no ability to shift from alternate markets or inventories. Other products that responding foreign producers reportedly can produce and package on the same equipment as fresh mushrooms are out-of-scope exotic mushrooms such as shiitake and oyster mushrooms. Canadian producers cannot shift production to products other than mushrooms (including in-scope and out-of-scope exotic mushrooms).

Imports from nonsubject sources

Nonsubject imports accounted for *** percent of total U.S. imports in 2024. The largest sources of nonsubject imports during January 2022 to June 2024 were Mexico and China.

Supply constraints

Most responding U.S. producers (2 of 8) reported that they had not experienced supply constraints since January 1, 2022 while most importers (5 of 8) reported that they had. Of the U.S. producers that reported they had experienced supply constraints, two U.S. producers reported experiencing supply constraints during 2022 through 2024, and one reported experiencing supply constraints in 2025. Three importers reported the constraints occurred during 2022 and 2023, five reported constraints in 2024, and three reported constraints in 2025 (table 2.5).

Table 2.5 Fresh mushrooms: Count of firms' responses regarding timing of supply constraints, by firm type and source

Period of constraint	U.S. producers	Importers
2022	2	3
2023	2	3
2024	2	5
2025	1	3

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

Constraints reported by domestic producers included poor crop yields related to disease, weather, or ***. Constraints reported by importers included production disruptions due to severe storms in the eastern United States, and fires and disease at some of *** facilities.

U.S. demand

Based on available information, the overall demand for fresh mushrooms is likely to experience large changes in response to changes in price. The main contributing factor is the range of cost shares of fresh mushrooms in final end-use products, such as retail-grade mushrooms for use in a recipe by an end user at home or food-service grade mushrooms for use in restaurants (small to moderate), or soup-grade mushrooms for further processing (large). Respondent South Mill stated that demand for fresh mushrooms has decreased by approximately 10 percent since before the COVID-19 pandemic due to overall cost constraints on the consumer and rising food costs.[15]

End uses and cost share

Fresh mushrooms account for all or a large share of the cost of the end-use products in which they are used, but the cost share of a meal or further processed fresh mushrooms may cover a wide range. Reported cost shares for some end uses, in addition to direct consumption, include value added mushrooms, such as stuffed mushrooms, or further processed or frozen mushrooms.

[15] Conference transcript, pp. 186-187 (Macleod, McLean).

Business cycles

Four of eight U.S. producers and six of eight importers indicated that the market was subject to business cycles. Specifically, firms reported that demand is highest for fresh mushrooms during the first and last quarter of the year, around the major holiday season, and importer *** reported that fresh mushrooms face more competition from other vegetables in the spring and summer. Petitioners stated that peak mushroom consumption generally occurs during the winter holidays and specifically portobello mushroom demand peaks in the summer during grilling season.[16] Respondent Farmers' Fresh stated that there are some increases during the holidays, but overall, there is not much variation over the course of the year.[17]

Respondent South Mill stated that mushroom growers face a significant challenge around those peaks in demand that are relatively extreme spikes in a short period of time, citing 30 to 50 percent spikes in demand over the course of 7 to 10 days.[18]

Demand trends

Most firms reported a decrease in U.S. demand for fresh mushrooms since January 1, 2022 (table 2.6).

Table 2.6 Fresh mushrooms: Count of firms' responses regarding overall domestic and foreign demand, by firm type

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

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

Substitute products

All responding U.S. producers and importers reported that there are no substitutes for fresh mushrooms.

[16] Conference transcript, p. 76 (Carroll).
[17] Conference transcript, p. 201 (McLean).
[18] Conference transcript, p. 203 (Macleod).

Substitutability issues

This section assesses the degree to which U.S.-produced fresh mushrooms and imports of fresh mushrooms from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of fresh mushrooms from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderately high degree of substitutability between domestically produced fresh mushrooms and fresh mushrooms imported from subject sources.[19] Factors contributing to this level of substitutability include similar quality, availability, and lead times for fresh mushrooms that are produced-to-order (although some firms reported that there is a preference for proximate producers and packers), little preference for particular country of origin (although some firms report that there is a growing preference for fresh mushrooms produced in new generation plants). Factors reducing substitutability include possible quality differences attributable to infrastructure differences, prevalence of disease in certain regions, and different transportation and lead times from various sources to their final point. Fresh mushrooms of higher grades can generally be substituted for fresh mushrooms of a lower grade (i.e. retail-grade fresh mushrooms may be used in food service or further processing and food-service grade mushrooms can be used for further processing with soup-grade mushrooms).

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations[20] were asked to identify the main purchasing factors their firm considered in their purchasing decisions for fresh mushrooms.

[19] The degree of substitution between domestic and imported fresh mushrooms depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced fresh mushrooms to the fresh mushrooms 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 conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

[20] This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part 5 for additional information.

The most often cited top three factors firms consider in their purchasing decisions for fresh mushrooms were quality and price (8 firms each) and availability (4 firms) as shown in table 2.7. Quality was the most frequently cited first-most important factor (cited by 7 firms), followed by price and availability (1 firm each); and price was the most frequently reported third-most important factor (4 firms). An additional factor reported by several firms was proximity and shipping lead times.

Table 2.7 Fresh mushrooms: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price / Cost	1	3	4	8
Quality	7	1	1	8
Availability / Supply	1	3	0	4
All other factors	0	2	4	NA

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

Note: Other factors include proximity and shipping lead times (4), packaging capabilities, food safety scores, service, and logistics (1 each).

Lead times

Fresh mushrooms are primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging 3 days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging 3 days as well.[21] Importers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging 3 days, and the remaining *** percent coming from inventories, with a lead time of 2 days.

[21] Petitioners stated that it is rare to have inventory for more than two days. Conference transcript, p. 62 (Carroll).

Comparison of U.S.-produced and imported fresh mushrooms

In order to determine whether U.S.-produced fresh mushrooms can generally be used in the same applications as imports from Canada, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.8 to 2.9, most U.S. producers reported that fresh mushrooms from the United States, Canada, and other sources are always interchangeable and most responding importers reported that fresh mushrooms from the United States and from Canada are sometimes interchangeable.[22] U.S. *** reported that U.S.-produced and Canadian mushrooms are sometimes interchangeable based on shelf-life, logistics, and quality, and that this is more of an issue when comparing fresh mushrooms on the West Coast to those from the East Coast. U.S. *** reported that interchangeability depends on growing infrastructure and distance from the customer.

Table 2.8 Fresh mushrooms: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	5	0	3	0
United States vs. Other	5	0	0	0
Canada vs. Other	4	0	0	0

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

Table 2.9 Fresh mushrooms: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	2	0	5	0
United States vs. Other	1	0	1	0
Canada vs. Other	1	0	1	0

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of fresh mushrooms from the United States, subject, or nonsubject countries. As seen in tables 2.10 to 2.11, most U.S. producers reported that differences other than price were never significant when comparing fresh mushrooms from the United States, Canada, and other sources. Most importers reported that factors other than price are always or frequently significant when comparing U.S.-produced fresh mushrooms with fresh mushrooms imported from Canada and most responding importers reported that factors other than price were sometimes or never significant, and cited factors such as growing infrastructure, distance from the customer, shelf-life, logistics, and quality.

[22] One importer each reported that U.S.-produced fresh mushrooms and fresh mushrooms from Canada and from other sources are “always” and “sometimes” interchangeable.

Table 2.10 Fresh mushrooms: 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

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	1	1	1	5
United States vs. Other	0	0	1	5
Canada vs. Other	0	0	1	5

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

Table 2.11 Fresh mushrooms: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	4	2	0	1
United States vs. Other	0	1	2	1
Canada vs. Other	0	0	3	1

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

Part 3: 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 volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of four growers, as well as eight packers[1] that accounted for *** percent[2] of U.S. production of fresh mushrooms during 2024.

U.S. producers

The Commission issued a U.S. producer questionnaire to 37 firms based on information contained in the petition. Twelve firms provided usable data on their operations. Table 3.1 lists U.S. producers of fresh mushrooms, their production locations, positions on the petition, and shares of total production.

[1] In this Part, "growers" generally refers to four firms that reported data as independent growers and who do not perform their own packing/packaging. "Packers" generally refers to eight firms that package and ship fresh mushrooms using product that they grew themselves, or acquired from affiliated growers and/or unaffiliated growers. "Producers" is used for all firms collectively. ***.

[2] Based on a comparison of packers' reported overall production (on the same equipment used to make fresh mushrooms) to U.S. Department of Agriculture, National Agricultural Statistical Service ("NASS") data. NASS data is reported on a crop year basis, while questionnaire data is reported on a calendar year basis.

Table 3.1 Fresh mushrooms: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2024

Firm	Position on petition	Production location(s)	Share of production packers (with or without own growing operations)	Share of production growers (without own packaging operations)
Basciani	***	Avondale, PA Orlando, FL Chicago, IL Minneapolis, MN San Antonio, TX	***	***
Farmers' Fresh	***	Colusa, CA Colusa, CA	***	***
Giorgio	Petitioner	Blandon, PA Toughkenamon, PA Phoenix, AZ	***	***
J-M Farms	Petitioner	Miami, OK Miami, OK Miami, OK Miami, OK Miami, OK Miami, OK	***	***
Kennett Square	Petitioner	Avondale, PA Avondale, PA	***	***
Modern Mushroom	Petitioner	Toughkenamon, PA	***	***
Monterey	***	Morgan Hill, CA Madisonville, TX Loudon, TN Royal Oaks, CA Orlando, FL Princeton, IL	***	***
Mountainview	***	Fillmore, Utah	***	***
Needham	Petitioner	West Grove, PA	***	***
Phillips	***	Kennett Square, PA	***	***
Sher-Rockee	Petitioner	Lincoln University, PA	***	***
South Mill	***	Kennett Square, PA Kennett Square, PA	***	***
All firms	Various	Various	100.0	100.0

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

Table 3.2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table 3.2 Fresh mushrooms: U.S. producers' ownership, related and/or affiliated firms

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

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

As indicated above, two U.S. producers are related to foreign producers of the subject merchandise and are related to U.S. importers of the subject merchandise. In addition, *** U.S. producers purchased fresh mushrooms from subject sources through related U.S. importers.

Table 3.3 presents events in the U.S. industry since January 1, 2022.

Table 3.3 Fresh mushrooms: Important industry events since 2022

Item	Firm	Event
Change in policy	---	Effective October 2025, the U.S. Department of Agriculture approved a $0.0020 per-pound increase in the assessment rate for U.S. producers and importers who market or import more than 500,000 pounds of fresh mushrooms; the rate is paid under the Mushroom Promotion, Research and Consumer Information Program, which supports promotion, research and consumer information programs for mushrooms.
Acquisition	Giorgi Mushroom Co.	In July 2025, Giorgi Mushroom Co., a subsidiary of the Giorgi Companies, Inc., announced its acquisition of a major stake in spawn producer L.F. Lambert Spawn Co. in order to build supply chain resilience.
Environmental conditions	---	Effective January 30, 2025, Pennsylvania's Department of Agriculture issued a mandatory quarantine order (i.e., perform a "steaming off" order) to all mushroom growers in the Kenneth and New Garden townships to help deal with the phorid fly infestation causing crop damage.
Closure	Monterey Mushrooms	Monterey Mushrooms closes its growing facility in Royal Oaks, California in December 2024, citing a lack of profits due to aging infrastructure, adverse weather, and inflation.
Closure	Monterey Mushrooms	National mushroom producer Monterey Mushrooms closes two of its growing locations in January 2024, one in Illinois and another in Florida, citing various business challenges.
Change in demand	---	In an October 2023 report that evaluates ten-year trends in the mushroom market, brown mushrooms' (i.e., criminis, baby bellas, and portabellas) share of total retail sales increased, while those of white button mushrooms fell; white mushrooms, however, still have a slight majority in total sales.
Acquisition	Windmill Farms	In February 2023, Canadian mushroom producer Windmill Farms acquired Ostrom Mushrooms' new growing facility in Sunnyside, Washington.
Acquisition	Giorgio Fresh Co.	In November 2022, fresh mushroom grower and shipper Giorgio Fresh Co. announced its acquisition of the packing and distribution/sales cooperative Country Fresh Mushroom, which has operations in Arizona and Pennsylvania.
Expansion	Ostrom Mushroom	In May 2022, Ostrom Mushrooms producer announces a new 39,000-square-ft growing facility in Sunnyside, Washington.

Sources: Offner, "Ostrom Mushroom to open new facility," https://www.thepacker.com/markets/marketing/ostrom-mushroom-open-new-facility, accessed December 5, 2025; Koger, "Giorgio purchases Country Fresh Mushroom Co.," https://www.thepacker.com/news/retail/giorgio-purchases-country-fresh-mushroom-co, accessed

December 5, 2025; Blue Book, “Windmill Farms expands to U.S. after acquisition,” https://www.bluebookservices.com/windmill-farms-expands-to-u-s-after-acquisition/, accessed December 5, 2025; The Packer, “Report cites rising preference for fresh, sliced and brown mushrooms,” https://www.thepacker.com/news/produce-crops/report-cites-rising-preference-fresh-sliced-and-brown-mushrooms#:~:text=%E2%80%9CProducers%20and%20retailers%20should%20take,this%20year%2C%20the%20report%20said., accessed December 5, 2025; Blue Book, “Monterey Mushrooms to close Illinois and Florida farms,” https://www.bluebookservices.com/monterey-mushrooms-to-close-illinois-and-florida-farms/, accessed December 5, 2025; Kinebrew, “Monterey Mushrooms to close forcing over 600 people out of work,” https://www.ksbw.com/article/monterey-mushrooms-close-600-out-work/62377583, accessed December 5, 2025; The Packer, “Giorgi Mushroom Co. Acquires L.F. Lambert Spawn Co.,” https://www.thepacker.com/news/industry/giorgi-mushroom-co-acquires-l-f-lambert-spawn-co, accessed December 5, 2025; The Packer, “USDA Approves Mushroom Assessment Rate Increase, Effective Oct. 1,” https://www.thepacker.com/news/industry/usda-approves-mushroom-assessment-rate-increase-effective-oct-1, accessed December 5, 2025; Commonwealth of Pennsylvania, “Phorid Fly,” https://www.pa.gov/agencies/pda/plants-land-water/plant-industry/entomology/phorid-fly, accessed November 26, 2025.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of fresh mushrooms since 2022. Six producers indicated in their questionnaires that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

Table 3.4 Fresh mushrooms: U.S. producers’ reported changes in operations, since January 1, 2022

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

Item	Firm name and narrative response on changes in operations
Plant closings	***
Plant closings	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Acquisitions	***

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

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

U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. packers' installed and practical capacity and production on the same equipment. Installed overall capacity utilization and practical overall capacity utilization both decreased steadily from 2022 to 2024, and from interim 2024 to interim 2025, as both production and capacity fell in each category steadily. Installed capacity utilization decreased by *** percentage points from 2022 to 2024, and was *** percentage points lower in interim 2025 than in interim 2024. Practical capacity utilization decreased by *** percentage points from 2022 to 2024, and was *** percentage points lower in interim 2025 than in interim 2024.

Table 3.5 Fresh mushrooms: U.S. packers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 pounds; utilization in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical fresh mushrooms	Capacity	***	***	***	***	***
Practical fresh mushrooms	Production	***	***	***	***	***
Practical fresh mushrooms	Utilization	***	***	***	***	***

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

Table 3.6 presents U.S. packers' reported narratives regarding practical capacity constraints.

Table 3.6 Fresh mushrooms: U.S. packers' reported capacity constraints since January 1, 2022

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

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

Table 3.7 presents combined U.S. producers' total surface area for growing operations (including the associated or related growing operations of packers), by product type and period. The majority of U.S. producers' surface area in any period was dedicated to production of fresh mushrooms, not intended for further processing (e.g., preserved or frozen). The majority of total surface area is accounted for by packers' growing operations, who accounted for at least *** percent of the total data reported for surface area in each period.

Table 3.7 Fresh mushrooms: U.S. producers' output, by firm and period

Surface area in 1,000 square feet; Share in percent; Yield in pounds per square foot

Product type	Measure	2022	2023	2024
Agaricus, not intended for further processing	Surface area	***	***	***
Agaricus, intended for further processing	Surface area	***	***	***
Other mushrooms	Surface area	***	***	***
Other products/crops	Surface area	***	***	***
All actively used surface area	Surface area	***	***	***
Left fallow or unused for entire period	Surface area	***	***	***
All surface area	Surface area	***	***	***
Agaricus, not intended for further processing	Share	***	***	***
Agaricus, intended for further processing	Share	***	***	***
Other mushrooms	Share	***	***	***
Other products/crops	Share	***	***	***
All actively used surface area	Share	***	***	***
Left fallow or unused for entire period	Share	***	***	***
All surface area	Share	100.0	100.0	100.0
Agaricus, not intended for further processing	Yield	***	***	***

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

Note: Shares 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 "—". Yield is calculated by dividing production of fresh mushrooms as reported in table 3.5 by reported surface area of *Agaricus* not intended for further processing as reported in this table.

Table 3.8 and figure 3.1 present U.S. packers' production, capacity, and capacity utilization. Capacity decreased from 2022 to 2024, and from interim 2024 to 2025, mainly driven by ***.[3] ***. Five packers reported decreasing production from 2022 to 2024 (mostly by ***), while three packers reported increased production (led by ***). The

[3] ***. See petitioner's postconference brief, pp. 11 to 12, and exh. 5.

decreases in production offset the increases, resulting in a *** percent decrease in production from 2022 to 2024, while production was *** percent lower in interim 2025 than in interim 2024.

Table 3.8 Fresh mushrooms: U.S. packers' output, by firm and period

Practical capacity

Capacity in 1,000 pounds; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.8 (Continued) Fresh mushrooms: U.S. packers' output, by firm and period

Production

Production in 1,000 pounds; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.8 (Continued) Fresh mushrooms: U.S. packers' output, by firm and period

Capacity utilization

Capacity utilization in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All firms	***	***	***	***	***

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

Table continued.

Table 3.8 (Continued) Fresh mushrooms: U.S. packers' output, by firm and period

Share of production

Share in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure 3.1 Fresh mushrooms: U.S. packers' output, by period

* * * * * * *

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

Table 3.9 presents a comparison of overall production data reported by packers in questionnaire responses to NASS production data.

Table 3.9 Fresh mushrooms: Total agaricus mushroom production, by period and data sources

Item	Measure	2022	2023	2024
Production (NASS)	Quantity	679,888	703,108	642,831
Production (Questionnaires)	Quantity	***	***	***
Coverage	Ratio	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official agricultural statistics of the U.S. Department of Agriculture, National Agricultural Statistical Service (NASS), accessed November 25, 2025.

Note: NASS production data is reported on a "crop year" basis ending in July.

Table 3.10 presents total *Agaricus* mushroom production, by state and period. The vast majority of *Agaricus* mushroom production is located in Pennsylvania, followed by California.

Table 3.10 Fresh mushrooms: Total *Agaricus* mushroom production, by state and period

State	Measure	2021—22	2022—23	2023—24
Pennsylvania	Quantity	446,586	465,785	441,303
California	Quantity	73,780	82,515	67,706
All other U.S. states	Quantity	159,522	154,807	133,822
All U.S. states	Quantity	679,888	703,108	642,831
Pennsylvania	Share	65.7	66.2	68.6
California	Share	10.9	11.7	10.5
All other U.S. states	Share	23.5	22.0	20.8
All U.S. states	Share	100.0	100.0	100.0

Source: Official agricultural statistics of the U.S. Department of Agriculture, National Agricultural Statistical Service (NASS), accessed November 25, 2025.

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: NASS production data is reported on a "crop year" basis ending in July.

Alternative products

As shown in table 3.11, at least *** percent of the products produced during any period by U.S. packers was fresh mushrooms. Five firms reported producing alternative products, including exotic or specialty mushrooms (e.g., shiitake or oyster mushrooms).

Table 3.11 Fresh mushrooms: U.S. packers' overall production on the same equipment as in-scope production, by period

Quantity in 1,000 pounds; Share in percent; Interim period is January through June

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Fresh mushrooms	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Fresh mushrooms	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. packers' U.S. shipments and exports

Table 3.12 presents U.S. packers' U.S. shipments, export shipments, and total shipments. U.S. shipments constituted at least *** percent of total shipments in each period,[4] with the remainder attributable to export shipments.[5] U.S. shipments decreased by *** percent from 2022 to 2024, and were *** percent lower in interim 2025 than in interim 2024. Five packers reported decreases in U.S. shipments from 2022 to 2025, with the biggest decrease attributable to ***.

Table 3.12 Fresh mushrooms: U.S. packers' shipments, by destination and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per 1,000 pounds; shares in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

[4] The share of U.S. shipments that were commercial shipments was between *** percent from 2022 to 2024. It was *** percent in interim 2024 and *** percent in interim 2025.

[5] For export shipments, the only identified destination market was ***.

U.S. packers' inventories

Table 3.13 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. Given the fresh nature of the product, inventories are not held by producers for very long.[6]

Table 3.13 Fresh mushrooms: U.S. packers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

As stated above, two U.S. packers (***) reported imports of fresh mushrooms from Canada by affiliated importers.[7] [8] These data are presented in tables 3.14 and 3.15. The firms' reasons for importing are presented in table 3.16.

Table 3.14 Fresh mushrooms: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from affiliated U.S. importer ***	Quantity	***	***	***	***	***
Imports from Canada to U.S. production	Ratio	***	***	***	***	***

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

[6] One packer stated at the staff conference: "75 percent of the mushrooms go out the same day they're harvested. Maybe 25 percent go the next day. It's rare to have inventory, you know, more than two days. You might build up a little bit before a holiday or a big sale or something, but, you know, you sell them within days." Conference transcript, p. 62 (Carroll).

[7] ***.

[8] ***.

Table 3.15 Fresh mushrooms: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from Canada by affiliated U.S. importer ***	Quantity	***	***	***	***	***
Imports from Canada by affiliated U.S. importer ***	Quantity	***	***	***	***	***
Imports from Canada by affiliated U.S. importers	Quantity	***	***	***	***	***
Imports from Canada by affiliated U.S. importer *** to U.S. production	Ratio	***	***	***	***	***
Imports from Canada by affiliated U.S. importer *** to U.S. production	Ratio	***	***	***	***	***
Imports from Canada by all affiliated U.S. importers to U.S. production	Ratio	***	***	***	***	***

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

Note: ***.

Table 3.16 Fresh mushrooms: 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. employment, wages, and productivity

Table 3.17 shows U.S. packers' employment-related data,[9] while table 3.18 shows U.S. growers' employment-related data.[10]

Table 3.17 Fresh mushrooms: U.S. packers' employment related information, by period

Interim is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (pounds per hour)	***	***	***	***	***
Unit labor costs (dollars per pound)	***	***	***	***	***

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

Table 3.18 Fresh mushrooms: U.S. growers' employment related information, by period

Interim is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (pounds per hour)	***	***	***	***	***
Unit labor costs (dollars per pound)	***	***	***	***	***

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

[9] For packers, these data are inclusive not just of packaging-related employment, but also employment data of their own growing operations or their related growers' growing operations.

[10] ***.

Table 3.19 shows U.S. producers' combined employment-related data.

Table 3.19 Fresh mushrooms: U.S. producers' employment related information, by period

Interim is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***

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

Part 4: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 21 firms believed to be importers of subject fresh mushrooms, as well as to all U.S. producers of fresh mushrooms.[1] Usable questionnaire responses were received from eight companies, representing *** percent of U.S. imports from Canada in 2024 under HTS statistical reporting number 0709.51.0100.[2] Table 4.1 lists all responding U.S. importers of fresh mushrooms from Canada and other sources, their locations, and their shares of U.S. imports, in 2024.

Table 4.1 Fresh mushrooms: U.S. importers, their headquarters, and share of imports within each source, 2024

Share in percent

Firm	Headquarters	Canada	Nonsubject sources	All import sources
Champ's	Aldergrove, BC	***	***	***
Farmers' Fresh	Abbotsford, BC	***	***	***
Highline Produce	Leamington, ON	***	***	***
Loveday	Winnipeg, MN	***	***	***
Monterey	Watsonville, CA	***	***	***
Mucci	Kingsville, ON	***	***	***
Piccioni Bros.	Dundas, ON	***	***	***
Wiet Peeters	Charing Cross, ON	***	***	***
All firms	Various	100.0	100.0	100.0

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

[1] The Commission issued questionnaires to those firms identified in the petitions.

[2] ***.

U.S. imports

Tables 4.2 and 4.3, and figure IV.1, present data for U.S. imports of fresh mushrooms from Canada and all other sources. Imports from Canada increased by *** percent by quantity from 2022 to 2024, and were *** percent higher in interim 2025 than in interim 2024. The unit value of imports from Canada increased by *** percent from 2022 to 2024, but was *** percent lower in interim 2025 than in interim 2024. As a ratio to U.S. production, imports from Canada increased by *** percentage points from 2022 to 2024, and were *** percentage points higher in interim 2025 than in interim 2024. *** reported imports from nonsubject sources (primarily ***); these imports as a share of total imports were highest in 2022 (at *** percent), and then steadily decreased thereafter.

Table 4.2 Fresh mushrooms: U.S. imports by source and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Share and ratio in percent; Ratio represents the ratio to U.S. production; Interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Canada	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
Canada	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
Canada	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
Canada	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Canada	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Canada	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Table 4.3 Fresh mushrooms: Share of U.S. imports by source and period

Changes (Δ) in percent (%) or percentage point (ppt)

Source	Measure	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to 2025
Canada	%Δ Quantity	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Quantity	▼***	▼***	▼***	▼***
All import sources	%Δ Quantity	▲***	▼***	▲***	▲***
Canada	%Δ Value	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Value	▼***	▼***	▼***	▼***
All import sources	%Δ Value	▲***	▲***	▲***	▲***
Canada	%Δ Unit value	▲***	▲***	▲***	▼***
Nonsubject sources	%Δ Unit value	▼***	▲***	▼***	▲***
All import sources	%Δ Unit value	▲***	▲***	▲***	▼***
Canada	ppt Δ Quantity	▲***	▲***	▲***	▲***
Nonsubject sources	ppt Δ Quantity	▼***	▼***	▼***	▼***
All import sources	ppt Δ Quantity	***	***	***	***
Canada	ppt Δ Value	▲***	▲***	▲***	▲***
Nonsubject sources	ppt Δ Value	▼***	▼***	▼***	▼***
All import sources	ppt Δ Value	***	***	***	***
Canada	ppt Δ Ratio	▲***	▲***	▲***	▲***
Nonsubject sources	ppt Δ Ratio	▼***	▼***	▼***	▼***
All import sources	ppt Δ Ratio	▲***	▲***	▲***	▲***

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

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.

Figure 4.1 Fresh mushrooms: 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.[3] 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.[4] As shown in table 4.4, imports

[3] 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)).

[4] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

from Canada accounted for *** percent of total imports of fresh mushrooms by quantity from September 2024 through August 2025.

Table 4.4 Fresh mushrooms: U.S. imports in the twelve-month period preceding the filing of the petition, September 2024 through August 2025

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
Canada	***	***
Nonsubject sources	***	***
All import sources	***	100.0

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

Apparent U.S. consumption and market shares

Quantity

Table 4.5 and figure 4.2 presents data on apparent U.S. consumption and U.S. market shares by quantity for fresh mushrooms. Apparent U.S. consumption decreased by *** percent from 2022 to 2024, and was *** percent lower in interim 2025 than in interim 2024. The share of consumption held by U.S. producers decreased by *** percentage points from 2022 to 2024, and was *** percentage points lower in interim 2025 than in interim 2024. The share of consumption held by imports from Canada increased by *** percentage points from 2022 to 2024, and was *** percentage points higher in interim 2025 than in interim 2024. The share of consumption held by imports from nonsubject sources was never higher than *** percentage points in any period.

Table 4.5 Fresh mushrooms: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 pounds; shares in percent; interim is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	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.

Figure 4.2 Fresh mushrooms: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Value

Table 4.6 and figure 4.3 present data on apparent U.S. consumption and U.S. market shares by value for fresh mushrooms. Apparent U.S. consumption by value decreased by *** percent from 2022 to 2024, and was *** percent lower in interim 2025 than in interim 2024. The share of consumption by value held by U.S. producers decreased by *** percentage points from 2022 to 2024, and was *** percentage points lower in interim 2025 than in interim 2024. The share of consumption held by imports from Canada increased by *** percentage points from 2022 to 2024, and was *** percentage points higher in interim 2025 than in interim 2024. The share of consumption by value held by imports from nonsubject sources was never higher than *** percentage points in any period.

Table 4.6 Fresh mushrooms: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent; interim is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
Canada	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	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.

Figure 4.3 Fresh mushrooms: Apparent U.S. consumption based on value, by source and period

* * * * * * *

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

Apparent U.S. consumption by type of mushroom

Tables 4.7 and 4.8 present data on U.S. packers' and U.S. importers' U.S. shipments of organic fresh mushrooms and non-organic ("conventional") fresh mushrooms, respectively. The vast majority of U.S. consumption of fresh mushrooms in any period was of conventional fresh mushrooms. While U.S. packers provided the highest share of either type of mushroom in every period, the magnitude of the share is different depending on the type of mushroom. For organic fresh mushrooms, U.S. producers accounted for between *** percent of the share of U.S. shipments, while for conventional fresh mushrooms, this share was between *** percent.

Table 4.7 Organic fresh mushrooms: U.S. packers' and U.S. importers' U.S. shipments of organic fresh mushrooms, by source and period

Quantity in 1,000 pounds; Shares and ratio in percent; Interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	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	***	***	***	***	***
Canada	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 "—". Share is the share within organic fresh mushrooms by source; Ratio is the ratio of each element of organic fresh mushrooms to overall consumption of all fresh mushrooms regardless of organic status.

Table 4.8 Conventional fresh mushrooms: U.S. packers' and U.S. importers' U.S. shipments of conventional fresh mushrooms, by source and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit value in dollars per pound; Shares in percent; Interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***
U.S. producers	Ratio	***	***	***	***	***
Canada	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 “—“. Share is the share within conventional fresh mushrooms by source; Ratio is the ratio of each element of conventional fresh mushrooms to overall consumption of all fresh mushrooms regardless of organic status.

Part 5: Pricing data

Factors affecting prices

Raw material costs

Major inputs to the production of fresh mushrooms include compost, electricity, and natural gas (figures 5.1 and 5.2 and tables 5.1 through 5.3). Petitioner Giorgi is vertically integrated and produces its own compost, but other U.S. growers may purchase compost as an input.[1] As shown in figure 5.1, compost prices increased during 2022 and mid-2023, at which point prices decreased and fluctuated through the last quarter of 2024.[2] As shown in figure 5.2, electricity costs fluctuated over the period but increased overall, and natural gas industrial prices increased during the first three quarters of 2022 but decreased sharply and remained low through the third quarter of 2025.

Raw materials accounted for 39.6 percent of U.S. producers' internal growing costs,[3] and energy and utilities accounted for 11.6 percent of internal growing costs in 2024. Combined, raw materials, energy, and utilities fluctuated between 14.0 and 15.0 percent of U.S. producers' cost of goods sold (COGS) during 2022 and 2024.[4]

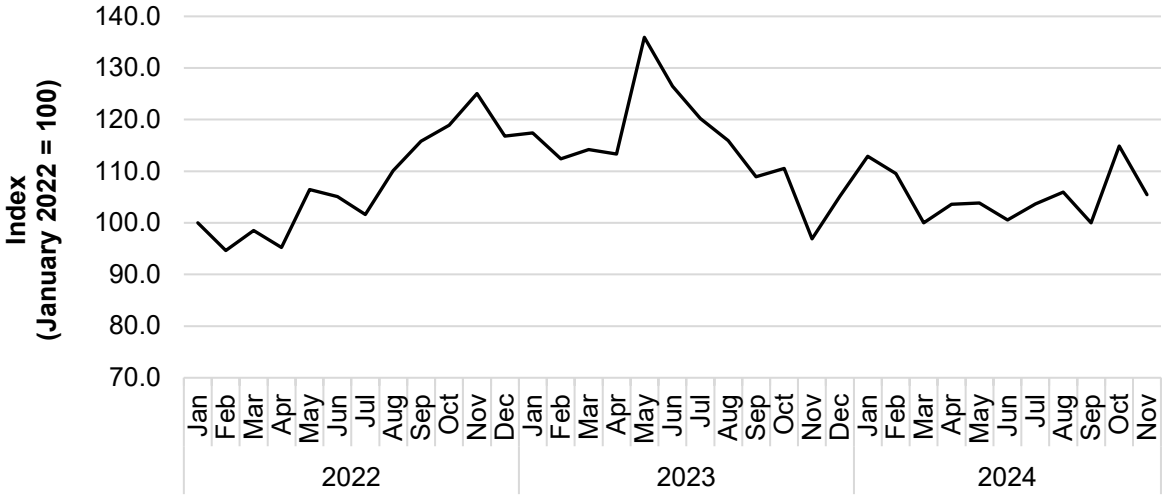
[1] Conference transcript, pp. 19-20 (Carroll).

[2] Data are not yet available for December 2024 onwards.

[3] Compost and substrate were the largest components of fresh mushroom growing materials and accounted for over 60 percent of growing materials in 2024.

[4] For more details, please see Part 6.

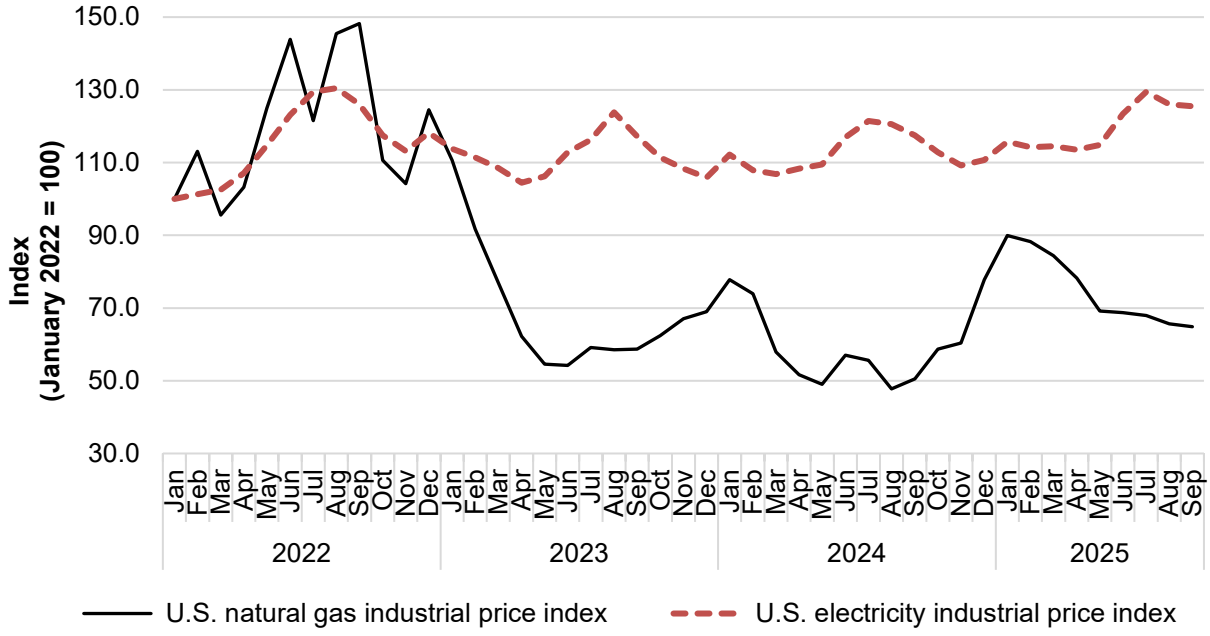
Figure 5.1 Raw materials: Mushroom compost weighted average price index, monthly, January 2022 to November 2024



Source: American Mushroom Institute, https://www.americanmushroom.org/clientuploads/Compost/Compost_Analysis/Mushroom_Compost_Prices_Dec_2024_outlook1.pdf, accessed December 2, 2025.

Note: Data series "Ingredient prices have been updated to reflect changes published by USDA/NASS/AMS and the Census Bureau.". The weighted average price is calculated using a weighted average of 45% for Hay, PA dry; 30% for Straw, Midwest dry; 19% for Horse bedding/Poultry manure dry; 4% for Corn cobs/Stover, Midwest dry and 2% for Gypsum, PA delivered.

Figure 5.2 Raw materials: Natural gas industrial price and industrial price of electricity, monthly, January 2022 to June 2025



Source: Energy Information Administration, “U.S. Natural Gas Prices” http://www.eia.gov/dnav/ng/ng_pri_sum_dcu_nus_m.htm and “Average Retail Price of Electricity” https://www.eia.gov/electricity/data/, accessed December 2, 2025.

Table 5.1 Raw materials: Mushroom compost weighted average price index, monthly, January 2022 to November 2024

Index in percent, January 2022=100

Month	2022	2023	2024	2025
January	100.00	117.40	112.89	NA
February	94.65	112.38	109.55	NA
March	98.51	114.20	100.00	NA
April	95.23	113.33	103.58	NA
May	106.46	135.94	103.86	NA
June	105.08	126.49	100.59	NA
July	101.59	120.21	103.66	NA
August	110.12	115.94	105.95	NA
September	115.82	108.93	100.03	NA
October	118.93	110.58	114.90	NA
November	125.03	96.89	105.47	NA
December	116.80	105.15	NA	NA

Source: American Mushroom Institute, https://www.americanmushroom.org/clientuploads/Compost/Compost_Analysis/Mushroom_Compost_Prices_Dec_2024_outlook1.pdf, accessed December 2, 2025.

Note: Data series "Ingredient prices have been updated to reflect changes published by USDA/NASS/AMS and the Census Bureau.". The weighted average price is calculated using a weighted average of 45% for Hay, PA dry; 30% for Straw, Midwest dry; 19% for Horse bedding/Poultry manure dry; 4% for Corn cobs/Stover, Midwest dry and 2% for Gypsum, PA delivered.

Table 5.2 Raw materials: Natural gas industrial price and industrial price of electricity, monthly, January 2022 to June 2025

Index in percent, January 2022=100

Month	2022	2023	2024	2025
January	100.00	110.63	77.81	89.98
February	113.10	91.68	73.96	88.29
March	95.53	77.04	57.94	84.44
April	103.24	62.25	51.62	78.27
May	124.96	54.55	49.00	69.18
June	143.91	54.24	57.01	68.72
July	121.57	59.17	55.62	67.95
August	145.45	58.55	47.77	65.64
September	148.23	58.71	50.54	64.87
October	110.63	62.40	58.71	NA
November	104.16	67.03	60.40	NA
December	124.50	69.03	77.81	NA

Source: Energy Information Administration, “U.S. Natural Gas Prices” http://www.eia.gov/dnav/ng/ng_pri_sum_dcu_nus_m.htm, accessed December 2, 2025.

Table 5.3 Raw materials: Natural gas industrial price and industrial price of electricity, monthly, January 2022 to June 2025

Index in percent, January 2022=100

Month	2022	2023	2024	2025
January	100.00	113.77	112.24	115.72
February	101.25	111.40	107.93	114.19
March	102.50	108.48	106.82	114.46
April	107.09	104.45	108.34	113.49
May	114.74	106.26	109.46	114.88
June	123.09	112.80	116.97	123.37
July	129.49	116.27	121.42	129.49
August	130.46	123.78	120.58	126.01
September	126.01	117.25	117.52	125.45
October	117.52	111.40	112.80	NA
November	113.21	108.34	109.18	NA
December	118.22	105.84	110.71	NA

Source: Energy Information Administration, "Average Retail Price of Electricity" https://www.eia.gov/electricity/data/, accessed December 2, 2025.

Transportation costs to the U.S. market

Transportation costs for fresh mushrooms shipped from subject countries to the United States averaged less than one percent for Canada during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.[5]

U.S. inland transportation costs

All responding U.S. producers[6] and all but one importer reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 7.0 to 10.0 percent while most importers reported costs of 4.9 to 10.0 percent.

[5] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting number 0709.51.0100.

[6] The U.S. industry is comprised of growers and packers. References in Part 5 to U.S. producers include only packers unless otherwise noted.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, price lists, and other methods (table 5.4).

Table 5.4 Fresh mushrooms: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. importers
Transaction-by-transaction	4	2
Contract	7	6
Set price list	6	6
Other	1	3
Responding firms	7	8

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.

U.S. producers reported selling most of their fresh mushrooms under annual contracts with a substantial share of the remaining sales under long-term contracts. Importers reported selling a plurality of their fresh mushrooms under annual contracts, with the next largest share of sales sold under short-term contracts (table 5.5). Contracts are generally negotiated throughout the year, but not immediately preceding big holidays during which there will be high demand.[7]

Table 5.5 Fresh mushrooms: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

Sale type	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***
All sales types	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.

[7] Conference transcript, p. 71 (Carroll, Shelton).

U.S. producers' short-term contracts generally last for 60 to 120 days and long-term contracts last for two years. Responding importers reported that their short-term contracts ranged from 90 to 180 days, and one importer reported that its long-term contracts were "variable" in length. U.S. producers' and importers' responses regarding price renegotiations were mixed. Both U.S. producers and importers reported that contracts would fix price, or both price and quantity, and that contract prices are not indexed to raw materials.

Respondent Highline stated that its prices are determined on a customer specific basis via either a formal contract or informal agreement and that prices are determined through a base price for "no less than 12 months." Informal agreements have no end date, tend to last longer than formal contracts, and can be exited with "fair notice."[8] Respondent Farmers' Fresh stated that it primarily sells to large retail and distribution companies such as Sysco, Trader Joes, and U.S. Foods, and that approximately 95 percent of its business is pursuant to contracts, many of which are long-term contracts.[9]

Sales terms and discounts

The vast majority of U.S. producers and importers typically quote prices on an f.o.b. basis. Most responding U.S. producers reported that they do not have a discount policy, but three U.S. producers reported offering quantity and/or total volume discounts. U.S. producer *** reported that discounts are not formally documented but are incorporated in the overall price. U.S. producer *** reported that it may offer promotional discounts or discounts due to quality complaints or rejection. U.S. importers reported offering quantity or total volume discounts in addition to payment term discounts, seasonal discounts, "discounts on request," or discounts due to quality complaints or rejection.

[8] Conference transcript, pp. 156-157 (Cambon).
[9] Conference transcript, p. 167 (McLean).

Price 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 fresh mushroom products[10] shipped to unrelated U.S. customers during January 2022 to June 2025. Importers were also asked to provide purchase cost data for the following products if they imported fresh mushrooms for repackaging or their own internal use.

***Product 1*.** Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic

***Product 2*.** Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional

***Product 3*.** Browns (creminis or baby bellas), medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional

***Product 4*.** Whites, medium whole, in 5 to 10 pound boxes, marketed as conventional

***Product 5*.** Whites, large whole, 24-ounce, 6-pack, marketed as conventional or organic

***Product 6*.** Brown, large whole, 24-ounce, 6-pack, marketed as conventional or organic

Eight U.S. producers and seven importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[11] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of fresh mushrooms and *** percent of U.S. shipments of subject imports from Canada in 2024.[12] Price data for products 1 to 6 are presented in tables 5.6 to 5.11 and figures 5.3 to 5.8.[13] No purchase cost data were reported.

[10] Petitioners requested pricing products 1-4, which specify either organic or conventional products, and Respondents submitted pricing products 5-6, which include both organic and conventional mushrooms in their definitions. Petitioners argue that products 5 and 6 do not allow for "apples-to-apples" comparisons. Conference transcript, p. 39, 81-82 (Herrmann).

[11] 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.

[12] Pricing coverage is based on U.S. shipments reported in questionnaires.

[13] See Appendix F for price analysis excluding data reported by ***.

Table 5.6 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollar per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 1: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic.

Table 5.7 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollar per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 2: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Table 5.8 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollar per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 3: Browns (creminis or baby bellas), medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Table 5.9 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollar per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 4: Whites, medium whole, in 5 to 10 pound boxes, marketed as conventional.

Table 5.10 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by source and quarter

Price in dollar per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 5: Whites, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Table 5.11 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter

Price in dollar per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 6: Brown, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Figure 5.3 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic.

Figure 5.4 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Figure 5.5 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Browns (creminis or baby bellas), medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Figure 5.6 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Whites, medium whole, in 5 to 10 pound boxes, marketed as conventional.

Figure 5.7 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, by source and quarter

Price of product 5

* * * * * * *

Volume of product 5

* * * * * * *

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

Note: Product 5: Whites, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Figure 5.8 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, by source and quarter

Price of product 6

* * * * * * *

Volume of product 6

* * * * * * *

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

Note: Product 6: Brown, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Price trends

In general, prices increased during January 2022 to June 2025. Table 5.12 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent to *** percent during January 2022 to June 2025 while import price increases ranged from *** percent to *** percent. Prices for product 1 from Canada decreased by *** percent and prices for product 4 produced in the United States decreased by *** percent. Indexed prices by pricing product are shown in figures 5.9 and 5.10 and tables 5.13 and 5.14.

Table 5.12 Fresh mushrooms: Summary of price data, by product and source, January 2022 to June 2025

Quantity in 1,000 pounds, Price in dollars per pound

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	14	***	***	***	***	***	***
Product 1	Canada	14	***	***	***	***	***	***
Product 2	United States	14	***	***	***	***	***	***
Product 2	Canada	14	***	***	***	***	***	***
Product 3	United States	14	***	***	***	***	***	***
Product 3	Canada	14	***	***	***	***	***	***
Product 4	United States	14	***	***	***	***	***	***
Product 4	Canada	14	***	***	***	***	***	***
Product 5	United States	14	***	***	***	***	***	***
Product 5	Canada	14	***	***	***	***	***	***
Product 6	United States	14	***	***	***	***	***	***
Product 6	Canada	14	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2022 to the last quarter in 2025.

Figure 5.9 Fresh mushrooms: Indexed U.S. producer prices, by quarter

* * * * * * *

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

Figure 5.10 Fresh mushrooms: Indexed subject U.S. importer prices, by quarter

* * * * * * *

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

Table 5.13 Fresh mushrooms: Indexed U.S. producer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4	Product 5	Product 6
2022 Q1	100.0	100.0	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***

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 5.14 Fresh mushrooms: Indexed subject U.S. importer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4	Product 5	Product 6
2022 Q1	100.0	100.0	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***

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 “—“.

Price comparisons

As shown in table 5.15, prices for product imported from Canada were below those for U.S.-produced product in most instances.[14] Prices for pricing products 1 through 4 imported from Canada were below those for U.S.-produced product in 47 of 56 instances (*** pounds, with margins of underselling ranging from *** to *** percent. In the remaining nine instances (*** pounds), prices for product from Canada were between *** and *** percent above prices for the domestic product. Prices for products 5 and 6 imported from Canada were above those for U.S.-produced product in 26 of 28 instances (*** pounds); margins of overselling ranged from *** to *** percent. In the remaining two instances (*** pounds), prices for product from Canada were between *** and *** percent below prices for the domestic product.

As shown in table 5.16, instances of underselling for products 1 through 4 occurred consistently throughout the period, while products 5 and 6 show the opposite pattern of overselling consistently throughout the period.

[14] Pricing products 1 through 4 were narrowly defined as either conventional or organic, while pricing products 5 and 6 were defined more broadly to include both conventional and organic product.

Table 5.15 Fresh mushrooms: Instances of underselling and overselling and the range and average of margins, by product

Quantity in 1,000 pounds; margin in percent

Products	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	14	***	***	***	***
Product 2	Underselling	14	***	***	***	***
Product 3	Underselling	14	***	***	***	***
Product 4	Underselling	5	***	***	***	***
Subtotal, products 1-4	Underselling	47	***	***	***	***
Product 5	Underselling	—	***	***	***	***
Product 6	Underselling	2	***	***	***	***
Subtotal, products 5-6	Underselling	2	***	***	***	***
All products	Underselling	49	***	***	***	***
Product 1	Overselling	—	***	***	***	***
Product 2	Overselling	—	***	***	***	***
Product 3	Overselling	—	***	***	***	***
Product 4	Overselling	9	***	***	***	***
Subtotal, products 1-4	Overselling	9	***	***	***	***
Product 5	Overselling	14	***	***	***	***
Product 6	Overselling	12	***	***	***	***
Subtotal, products 5-6	Overselling	26	***	***	***	***
All products	Overselling	35	***	***	***	***

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 5.16 Fresh mushrooms: Instances of underselling and overselling and the range and average of margins, by year

Quantity in 1,000 pounds; margin in percent

Period	Product grouping	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2022	Products 1-4	Underselling	16	***	***	***	***
2023	Products 1-4	Underselling	16	***	***	***	***
2024	Products 1-4	Underselling	12	***	***	***	***
January through June 2025	Products 1-4	Underselling	6	***	***	***	***
All periods	Products 1-4	Underselling	50	***	***	***	***
2022	Products 1-4	Overselling	—	***	***	***	***
2023	Products 1-4	Overselling	—	***	***	***	***
2024	Products 1-4	Overselling	4	***	***	***	***
January through June 2025	Products 1-4	Overselling	2	***	***	***	***
All periods	Products 1-4	Overselling	6	***	***	***	***
2022	Products 5-6	Underselling	2	***	***	***	***
2023	Products 5-6	Underselling	—	***	***	***	***
2024	Products 5-6	Underselling	—	***	***	***	***
January through June 2025	Products 5-6	Underselling	—	***	***	***	***
All periods	Products 5-6	Underselling	2	***	***	***	***
2022	Products 5-6	Overselling	6	***	***	***	***
2023	Products 5-6	Overselling	8	***	***	***	***
2024	Products 5-6	Overselling	8	***	***	***	***
January through June 2025	Products 5-6	Overselling	4	***	***	***	***
All periods	Products 5-6	Overselling	26	***	***	***	***

Table continued.

Table 5.16 (Continued) Fresh mushrooms: Instances of underselling and overselling and the range and average of margins, by year

Quantity in 1,000 pounds; margin in percent

Period	Product grouping	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2022	All products	Underselling	18	***	***	***	***
2023	All products	Underselling	16	***	***	***	***
2024	All products	Underselling	12	***	***	***	***
January through June 2025	All products	Underselling	6	***	***	***	***
All periods	All products	Underselling	52	***	***	***	***
2022	All products	Overselling	6	***	***	***	***
2023	All products	Overselling	8	***	***	***	***
2024	All products	Overselling	12	***	***	***	***
January through June 2025	All products	Overselling	6	***	***	***	***
All periods	All products	Overselling	32	***	***	***	***

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

The Commission requested that U.S. producers of fresh mushrooms report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of fresh mushrooms from Canada during January 2022 through June 2025. Of the eight responding U.S. producers, five reported that they had to reduce prices, had to roll back announced price increases, and had lost sales. Two U.S. producers submitted lost sales and lost revenue allegations and identified 20 firms with which they lost sales and revenue.

Staff contacted 20 purchasers and received responses from 9 purchasers.[15] Responding purchasers reported purchasing *** million pounds of fresh mushrooms during January 2022 to June 2025 (table 5.17).

[15] One purchaser *** did not provide usable purchase quantity data, but indicated that it had purchased from producers in the United States and in Canada.

Table 5.17 Fresh mushrooms: Purchasers' reported purchases and imports, by firm and source

Quantity in 1,000 pounds, share in percent

Firm	Domestic quantity	Canada quantity	All other quantity	Change in domestic share	Change in subject share	Change in all other share
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

During 2024, responding purchasers purchased 74.9 percent from U.S. producers, 19.6 percent from Canada, and 5.5 percent from nonsubject countries (table 5.18). Purchasers were asked about changes in their purchasing patterns from different sources since 2022. Of the responding purchasers, six reported decreasing purchases from domestic producers (fluctuating down or steadily decreasing), three reported increasing purchases (fluctuating up or steadily increasing). Explanations for decreasing purchases of domestic product included U.S.-based plant closures, service issues, ***, and mushroom disease on the East Coast.

Table 5.18 Fresh mushrooms: Count of 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	2	1	0	3	3	0
Canada	3	3	1	2	0	0
All other sources	1	1	1	0	0	3
Sources unknown	0	0	0	0	0	3

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

Of the nine responding purchasers, seven reported that, since 2022, they had purchased imported fresh mushrooms from Canada instead of U.S.-produced product. Nine purchasers reported that subject import prices were lower than U.S.-produced product, and one of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. One purchaser estimated the quantity of fresh mushrooms from Canada purchased instead of domestic product and one reported that quantities shifted were "difficult to quantify" because of shifting contract volumes (table 5.19).

Of the nine responding purchasers, none reported that U.S. producers had reduced prices in order to compete with lower-priced imports from Canada; three reported that they did not know and the remaining firms reported that they had not (table 5.20).

Table 5.19 Fresh mushrooms: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table 5.19 (Continued) Fresh mushrooms: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 7; No: 2	Yes: 9; No: 0	Yes: 1; No: 5	***	NA

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

Table 5.20 Fresh mushrooms: Purchasers' responses to U.S. producer price reductions, by firm

Price reductions in percent

Firm	Producers lowered prices	Price reduction	Narrative on producer price reductions
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes: 0; No: 6	Yes: 0; No: 0	NA

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

In responding to the lost sales and lost revenue survey, some purchasers provided additional information on purchases and market dynamics. Purchaser *** reported that it has *** and while it sources from mushroom growers in the West, they do not have enough capacity to fully satisfy its needs. Purchaser *** reported that it changed to a Canadian supplier when Monterey Mushrooms closed its facility in Illinois. Purchaser *** reported that it paid a premium for imported fresh mushrooms from Canada because the quality "far exceeds" what is available from U.S. producers.

Part 6: Financial experience of U.S. producers

Background[1]

Twelve privately held U.S. producers (including packers and independent growers) provided usable financial results on their fresh mushrooms operations.[2] [3] Eleven out of 12 U.S. producers reported financial data for a fiscal year on or around December 31st and on the basis of GAAP.[4]

Five U.S. packers (***) account for over 90 percent of net sales quantity and value for all five data periods for which data were collected (*** U.S. packers had affiliated growing operations).[5] The U.S. industry's fresh mushrooms net sales primarily reflect U.S. commercial sales (*** to *** percent of total net sales value during the period examined). Given the predominance of U.S. commercial sales, a single line item for sales is presented in the relevant tables in this section of the report.[6] Figure 6.1 presents each responding U.S. packers' share of the total reported net sales quantity in 2024.

[1] The following abbreviations are used in the tables and/or text of this section: U.S. packers that have affiliated growing operations ("integrated U.S. producers/packers" or "U.S. packers"), fresh mushroom growers that do not pack ("independent U.S. growers" or "U.S. growers"), combined financial results of integrated U.S. producers/packers and independent U.S. growers ("U.S. industry" or "U.S. producers" or "combined U.S. packers and growers"), generally accepted accounting principles ("GAAP"), fiscal year ("FY"), January 2022 to June 2025 ("period examined"), January to June2024 ("interim 2024"), January to June 2025 ("interim 2025"), net sales ("NS"), 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] Eight integrated U.S. packers/producers (***) and five independent U.S. growers (***) are included in the financial data.

[3] One firm (***) was an integrated U.S. packer/producer but changed its operations to independent U.S. grower starting November 1, 2024 after signing a contact with integrated U.S. packer/producer ***; *** is included in both the integrated U.S. packer/producer and independent U.S. grower counts for its switch in operations in 2024. *** U.S. producer questionnaire, 2.2a.

[4] *** reported its financial results on the basis of a fiscal year that ends on October 31st and used tax accrual basis. U.S. producer questionnaires, 3.2.A.1, 3.2.A2, 3.2.B.4, 6.6A, and 6.6.B.1.

[5] These five integrated U.S. producers/packers are referred to as "large producers" in this section of the report. Financial data largely reflect the operations of these large producers that have growing (via affiliates) and packing operations. Company specific AUVs fluctuated broadly due to multiple factors, including level of integration and efficiency gains from size of operation.

[6] Internal consumption accounted for *** and was reported by one U.S. producer ***. *** and were reported by (***).

Figure 6.1 Fresh mushrooms: U.S. packers' share of net sales quantity in 2024, by firm

* * * * * * *

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

Note: *** are independent U.S. growers and not included with the U.S. packers data in the figure above.

Operations on fresh mushrooms

Table 6.1 presents aggregated data on integrated U.S. packers/producers' operations in relation to fresh mushrooms, table 6.2 presents integrated U.S. packers/producers' specific COGS items, and table 6.3 presents integrated U.S. packers/producers' corresponding changes in AUVs. Table 6.4 presents independent U.S. growers' results of operations while table 6.5 presents independent U.S. growers' corresponding changes in AUVs.[7] Table 6.6 presents combined integrated U.S. packers/producers' and independent U.S. growers' ("U.S. industry") results of operations (independent U.S. growers' data were accounted for by using their net profitability as an adjustment to U.S. packers' total COGS) while table 6.7 presents the combined U.S. industry's corresponding changes in AUVs.[8] Table 6.8 presents selected financial data of Integrated U.S. packers/producers', by firm.

[7] The five independent U.S. growers (***) that provided usable data accounted for *** percent of Integrated U.S. packers/producers' reported purchases of fresh mushrooms for packing throughout the period examined (calculated from tables 6.2 and 6.4).

[8] Appendix G presents the U.S. industry's financial results excluding *** for related party considerations.

Table 6.1 Fresh mushrooms: Integrated U.S. packers/producers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; interim is January through June; shares in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	4	4	4	5	4
Net losses	Count	5	3	5	5	5
Data	Count	8	8	8	8	7

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

Note: Shares represent the share of COGS.

Table 6.2 Fresh mushrooms: Integrated U.S. packers/producers' costs of goods sold (COGS), by COGS item and period

Value in 1,000 dollars; interim is January through June

COGS item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Growing raw materials: Spawn/spore	Value	***	***	***	***	***
Growing raw materials: Compost/substrate	Value	***	***	***	***	***
Growing raw materials: Casing, top layer	Value	***	***	***	***	***
Growing raw materials: All other	Value	***	***	***	***	***
Growing raw materials: All inputs	Value	***	***	***	***	***
Growing: Energy and utilities	Value	***	***	***	***	***
Growing: Labor costs	Value	***	***	***	***	***
Growing: All other costs	Value	***	***	***	***	***
Growing: Total	Value	***	***	***	***	***
Packing: Transportation and storage	Value	***	***	***	***	***
Packing: Purchases/acquisition of fresh mushrooms from independent growers	Value	***	***	***	***	***
Packing: All cutting expenses	Value	***	***	***	***	***
Packing: Packaging materials	Value	***	***	***	***	***
Packing: All material inputs	Value	***	***	***	***	***
Packing: Labor costs for packing	Value	***	***	***	***	***
Packing: Other factory	Value	***	***	***	***	***
Packing: Total packaged goods cost	Value	***	***	***	***	***
All COGS: Less other revenue	Value	***	***	***	***	***
All COGS: Total	Value	***	***	***	***	***

Table continued.

Table 6.2 (Continued) Fresh mushrooms: U.S. packers' costs of goods sold (COGS), by COGS item and period

Ratios in percent; interim is January through June

COGS item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Growing raw materials: Spawn/spore	Ratio to NS	***	***	***	***	***
Growing raw materials: Compost/substrate	Ratio to NS	***	***	***	***	***
Growing raw materials: Casing, top layer	Ratio to NS	***	***	***	***	***
Growing raw materials: All other	Ratio to NS	***	***	***	***	***
Growing raw materials: All inputs	Ratio to NS	***	***	***	***	***
Growing: Energy and utilities	Ratio to NS	***	***	***	***	***
Growing: Labor costs	Ratio to NS	***	***	***	***	***
Growing: All other costs	Ratio to NS	***	***	***	***	***
Growing: Total	Ratio to NS	***	***	***	***	***
Packing: Transportation and storage	Ratio to NS	***	***	***	***	***
Packing: Purchases/acquisition of fresh mushrooms from independent growers	Ratio to NS	***	***	***	***	***
Packing: All cutting expenses	Ratio to NS	***	***	***	***	***
Packing: Packaging materials	Ratio to NS	***	***	***	***	***
Packing: All material inputs	Ratio to NS	***	***	***	***	***
Packing: Labor costs for packing	Ratio to NS	***	***	***	***	***
Packing: Other factory	Ratio to NS	***	***	***	***	***
Packing: Total packaged goods cost	Ratio to NS	***	***	***	***	***
All COGS: Less other revenue	Ratio to NS	***	***	***	***	***
All COGS: Total	Ratio to NS	***	***	***	***	***

Table continued.

Table 6.2 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' costs of goods sold (COGS), by COGS item and period

Shares in percent; interim is January through June

COGS item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Growing raw materials: Spawn/spore	Share	***	***	***	***	***
Growing raw materials: Compost/substrate	Share	***	***	***	***	***
Growing raw materials: Casing, top layer	Share	***	***	***	***	***
Growing raw materials: All other	Share	***	***	***	***	***
Growing raw materials: All inputs	Share	***	***	***	***	***
Growing: Energy and utilities	Share	***	***	***	***	***
Growing: Labor costs	Share	***	***	***	***	***
Growing: All other costs	Share	***	***	***	***	***
Growing: Total	Share	***	***	***	***	***
Packing: Transportation and storage	Share	***	***	***	***	***
Packing: Purchases/acquisition of fresh mushrooms from independent growers	Share	***	***	***	***	***
Packing: All cutting expenses	Share	***	***	***	***	***
Packing: Packaging materials	Share	***	***	***	***	***
Packing: All material inputs	Share	***	***	***	***	***
Packing: Labor costs for packing	Share	***	***	***	***	***
Packing: Other factory	Share	***	***	***	***	***
Packing: Total packaged goods cost	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table 6.2 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' costs of goods sold (COGS), by COGS item and period

Unit values in dollars per pound; interim is January through June

COGS item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Growing raw materials: Spawn/spore	Unit Value	***	***	***	***	***
Growing raw materials: Compost/substrate	Unit Value	***	***	***	***	***
Growing raw materials: Casing, top layer	Unit Value	***	***	***	***	***
Growing raw materials: All other	Unit Value	***	***	***	***	***
Growing raw materials: All inputs	Unit Value	***	***	***	***	***
Growing: Energy and utilities	Unit Value	***	***	***	***	***
Growing: Labor costs	Unit Value	***	***	***	***	***
Growing: All other costs	Unit Value	***	***	***	***	***
Growing: Total	Unit Value	***	***	***	***	***
Packing: Transportation and storage	Unit Value	***	***	***	***	***
Packing: Purchases/acquisition of fresh mushrooms from independent growers	Unit Value	***	***	***	***	***
Packing: All cutting expenses	Unit Value	***	***	***	***	***
Packing: Packaging materials	Unit Value	***	***	***	***	***
Packing: All material inputs	Unit Value	***	***	***	***	***
Packing: Labor costs for packing	Unit Value	***	***	***	***	***
Packing: Other factory	Unit Value	***	***	***	***	***
Packing: Total packaged goods cost	Unit Value	***	***	***	***	***
All COGS: Less other revenue	Unit Value	***	***	***	***	***
All COGS: Total	Unit Value	***	***	***	***	***

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

Note: Shares represent the share of COGS. 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 COGS is before the other revenue offset. The total material inputs into packaging and total packaged goods costs include the total growing costs.

Table 6.3 Fresh mushrooms: Integrated U.S. packers/producers' changes in AUVs between comparison periods

Changes in percent; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

Table 6.3 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' changes in AUVs between comparison periods

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▼***
SG&A expense	▲***	▲***	▼***	▼***
Operating income or (loss)	▼***	▼***	▼***	▼***
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 6.4 Fresh mushrooms: Independent U.S. growers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; unit value in dollars per pound; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
Salaries and labor costs	Value	***	***	***	***	***
All other operating expenses	Value	***	***	***	***	***
All operating expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Salaries and labor costs	Ratio to NS	***	***	***	***	***
All other operating expenses	Ratio to NS	***	***	***	***	***
All operating expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
All other expenses	Ratio to NS	***	***	***	***	***
All other income	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
Salaries and labor costs	Unit value	***	***	***	***	***
All other operating expenses	Unit value	***	***	***	***	***
All operating expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
All other expenses	Unit value	***	***	***	***	***
All other income	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	4	4	5	4	1
Net losses	Count	4	4	5	4	2
Data	Count	4	4	5	4	5

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 "—". Independent U.S. grower data represent the U.S. operations of growers that are unaffiliated/unrelated to U.S. packers.

Table 6.5 Fresh mushrooms: Independent U.S. growers' changes in AUVs between comparison periods

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▲***	▲***
Salaries and labor costs	▲***	▲***	▲***	▲***
All other operating expenses	▲***	▲***	▲***	▼***
All operating expenses	▲***	▲***	▲***	▼***

Table continued.

Table 6.5 (Continued) Fresh mushrooms: Independent U.S. growers' changes in AUVs between comparison periods

Changes in dollars per pound; Interim period is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▲***	▲***
Salaries and labor costs	▲***	▲***	▲***	▲***
All other operating expenses	▲***	▲***	▲***	▼***
All operating expenses	▲***	▲***	▲***	▼***
Operating income or (loss)	▼***	▲***	▼***	▲***
All other expenses	▲***	▲***	▲***	▲***
All other income	▲***	▲***	▼***	▲***
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 6.6 Fresh mushrooms: Combined integrated U.S. packers/producers' and independent U.S. growers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***

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

Note: Independent U.S. growers data were accounted for by adding the absolute value of their net profitability in table 6.4 as an adjustment to U.S. packers' total COGS.

Table 6.7 Fresh mushrooms: Combined integrated U.S. packers/producers' and independent U.S. growers' changes in AUVs between comparison periods

Changes in percent; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

Table 6.7 (Continued) Fresh mushrooms: Combined integrated U.S. packers/producers' and independent growers' changes in AUVs between comparison periods

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▼***
SG&A expense	▲***	▲***	▼***	▼***
Operating income or (loss)	▼***	▼***	▼***	▼***
Net income or (loss)	▼***	▼***	▼***	▲***

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

Note: Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Table 6.8 Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 pounds; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
All independent U.S. growers only profitability	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued)Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and Independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

Table continued.

Table 6.8 (Continued) Fresh mushrooms: Integrated U.S. packers/producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***
Combined U.S. packers and independent U.S. growers	***	***	***	***	***

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 "—".

Net sales

Table 6.1 shows that integrated U.S. packers/producers' net sales consistently declined by quantity and irregularly by value while per unit of fresh mushrooms sold irregularly increased from 2022 to 2024; net sales quantity, value, and per unit sold were lower in interim 2025 than in interim 2024.[9] Table 6.4 shows that independent U.S. growers' net sales irregularly declined by quantity and value, while per unit sold prices consistently increased from 2022 to 2024; net sales quantity, value, and per unit sold all were higher in interim 2025 than in interim 2024.[10]

Cost of goods sold and gross income or loss[11]

Table 6.2 shows that total material inputs (the vast majority were costs from related growing operations and purchases of fresh mushrooms from independent U.S. growers) accounted for the largest share of integrated U.S. producers/packers' total packaged goods COGS, ranging from *** to *** over the period examined.[12] The per-pound cost of total material input costs for packaging consistently increased from 2022 to 2024, but were lower in interim 2025 than in interim 2024 (table 6.2).

Table 6.6 shows that the U.S. industry's total COGS irregularly declined (reflecting the irregular decline of total net sales quantity in the full year periods) while total COGS as a share of net sales and per-unit COGS consistently increased from 2022 to 2024.[13] Total COGS and per-unit COGS were lower while total COGS as a share of net sales were higher in interim 2025 than in interim 2024. Table 6.6 shows that the U.S. industry's gross profit, gross profit as a share of

[9] Table 6.8 shows that packer-specific average per-pound net sales values varied. Differences presumably reflect factors such as product mix (e.g., white button, cremini, portobello, whether organic or non-organic), size of packing operations, and the wide range of packaging types.

[10] Independent U.S. growers sell to Integrated U.S. packers/producers mostly under contract.

[11] COGS items are presented based integrated U.S. producers/packers' responses in the questionnaires (question III-9e). Specific COGS breakouts of independent U.S. growers are not appropriate given the differing types of operations.

[12] Within integrated U.S. producers/packers' all material inputs, growing fresh mushrooms accounted for the largest share of their total packaged goods COGS, ranging from *** percent of total packaged goods COGS over the period examined (table 6.2). Purchases of fresh mushrooms were the second largest share of total packaged goods COGS, ranging from *** percent of total packaged goods COGS (table 6.2).

[13] As noted in table 6.6, independent U.S. growers' net income or loss from table 6.4 were added to Integrated U.S. packers/producers' total COGS in the combined table 6.6. The impact of adding independent U.S. growers' net profitability to Integrated U.S. packers/producers total COGS (as presented in table 6.6) were *** percent or less from 2022 to interim 2025 (calculated by comparing integrated U.S. packers/producers' total COGS in table 6.1 with table 6.6).

net sales, and gross profit per unit all consistently declined from 2022 to 2024 and were lower in interim 2025 than in interim 2024.

SG&A expenses and operating income or loss[14]

As presented in table 6.1, integrated U.S. packers' total SG&A expenses, SG&A expense ratio (i.e., total SG&A expenses divided by net sales), and per unit SG&A expenses all irregularly increased from 2022 to 2024 but were lower in interim 2025 than in interim 2024.

In conjunction with the consistent decline in the integrated U.S. packers' total gross profit, corresponding operating income also declined consistently, with SG&A expenses during the full-year periods magnifying the impact of declining gross profit (table 6.1). On a company-specific basis and similar to the financial results at the gross level, only one out of five of the largest integrated U.S. packers (***) reported consistent gains in operating profits from 2022 to 2024, but *** operating profits were much lower in interim 2025 than in interim 2024 (table 6.8).

[14] SG&A expenses are presented based integrated U.S. producers/packers' responses in the questionnaires. Independent U.S. growers responses did not report SG&A expenses. SG&A expenses for the combined financial results of integrated U.S. packers/producers and independent U.S. growers) presented in table 6.6 are exactly the same as table 6.1 that showed integrated U.S. packers/producers given that the net profitability of independent U.S. growers did not change SG&A expenses.

All other expenses and net income or loss[15]

Classified below the operating income level are interest expenses, other expenses, and other income. In table 6.1, these items are aggregated, and only the net amount is shown. Net other expenses and income irregularly increased from 2022 to 2024 but were lower in interim 2025 than in interim 2024.

The integrated U.S. packers (table 6.1) as well as the U.S. industry's (table 6.6) operating income and net income shared the same directional pattern of consistent decline from 2022 to 2024. As compared to operating income, the lower amount of net income reflects interest expense and other expenses, both varying in terms of their relative importance during the period, which were partially offset by other income.[16]

[15] All other expenses are presented based integrated U.S. producers/packers' responses in the questionnaires. Independent U.S. growers responses did not report all other expenses. Net other expenses and income for the combined financial results of integrated U.S. packers/producers and independent U.S. growers) presented in table 6.6 are exactly the same as table 6.1 that showed integrated U.S. packers/producers given that the net profitability of independent U.S. growers did not change net all other expenses and income.

[16] A variance analysis is not shown due to different levels of vertical integration as well as the large variety of product mixes and cost structures among the reporting firms.

Capital expenditures and research and development expenses

Table 6.9 presents U.S. packers' capital expenditures, by firm, and table 6.11 presents U.S. packers' R&D expenses, by firm. Tables 6.10 and 6.12 present the U.S. packers' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table 6.9 Fresh mushrooms: U.S. packers' capital expenditures, by firm and period

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

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

Table 6.10 Fresh mushrooms: U.S. packers' narrative descriptions of their capital expenditures

Firm	Narrative on capital expenditures
Basciani	***
Farmers' Fresh	***
Giorgio	***
J-M Farms	***
Monterey	***
Mountainview	***
Phillips	***
South Mill	***

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

Table 6.11 Fresh mushrooms: U.S. packers' R&D expenses, by firm and period

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
Basciani	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***
Giorgio	***	***	***	***	***
J-M Farms	***	***	***	***	***
Monterey	***	***	***	***	***
Mountainview	***	***	***	***	***
Phillips	***	***	***	***	***
South Mill	***	***	***	***	***
All U.S. packers	***	***	***	***	***

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

Table 6.12 Fresh mushrooms: U.S. packers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Basciani	***
Farmers' Fresh	***
Giorgio	***
J-M Farms	***
Monterey	***
Mountainview	***
Phillips	***
South Mill	***

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

Assets and return on assets

Table 6.13 presents data on the U.S. packers' total assets while table 6.14 presents their operating ROA.[17] Table 6.15 presents U.S. packers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table 6.13 Fresh mushrooms: U.S. packers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
Basciani	***	***	***
Farmers' Fresh	***	***	***
Giorgio	***	***	***
J-M Farms	***	***	***
Monterey	***	***	***
Mountainview	***	***	***
Phillips	***	***	***
South Mill	***	***	***
All U.S. packers	***	***	***

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

Table 6.14 Fresh mushrooms: U.S. packers' ROA, by firm and period

Ratio in percent

Firm	2022	2023	2024
Basciani	***	***	***
Farmers' Fresh	***	***	***
Giorgio	***	***	***
J-M Farms	***	***	***
Monterey	***	***	***
Mountainview	***	***	***
Phillips	***	***	***
South Mill	***	***	***
All U.S. packers	***	***	***

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

[17] 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 6.15 Fresh mushrooms: U.S. packers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Basciani	***
Farmers' Fresh	***
Giorgio	***
J-M Farms	***
Monterey	***
Mountainview	***
Phillips	***
South Mill	***

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

Capital and investment

The Commission requested U.S. packers and independent growers of fresh mushrooms to describe any actual or potential negative effects of imports of fresh mushrooms from Canada on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Tables 6.16 and 6.18 presents the number of U.S. packers and independent growers reporting an impact in each category, respectively; tables 6.17 and 6.19 provide the U.S. packers' and independent growers' narrative responses, respectively.

Table 6.16 Fresh mushrooms: Count of U.S. packers indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect

Number of packers reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	5
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	2
Return on specific investments negatively impacted	Investment	2
Other investment effects	Investment	2
Any negative effects on investment	Investment	5
Rejection of bank loans	Growth	2
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	3
Other growth and development effects	Growth	3
Any negative effects on growth and development	Growth	5
Anticipated negative effects of imports	Future	5

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

Table 6.17 Fresh mushrooms: U.S. packers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Other negative effects on investments	***
Other negative effects on investments	***
Rejection of bank loans	***
Rejection of bank loans	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***

Table continued.

Item	Firm name and narrative on impact of imports
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Table 6.18 Fresh mushrooms: Count of U.S. independent growers indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect

Number of independent growers reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	3
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	4
Return on specific investments negatively impacted	Investment	3
Other investment effects	Investment	1
Any negative effects on investment	Investment	4
Rejection of bank loans	Growth	2
Lowering of credit rating	Growth	2
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	4
Other growth and development effects	Growth	2
Any negative effects on growth and development	Growth	4
Anticipated negative effects of imports	Future	4

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

Table 6.19 Fresh mushrooms: U.S. independent growers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Other negative effects on investments	***
Rejection of bank loans	***
Lowering of credit rating	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Other effects on growth and development	***
Other effects on growth and development	***

Table continued.

Item	Firm name and narrative on impact of imports
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part 7: 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 factors[1]--
>
> (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 volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. 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."

The industry in Canada

The Commission issued foreign producers' or exporters' questionnaires to 25 firms believed to produce and/or export fresh mushrooms from Canada.[3] Usable responses to the Commission's questionnaire were received from 12 firms.

Table 7.1 presents the number of producers/exporters in Canada that responded to the Commission's questionnaire, their exports to the United States as a share of U.S. imports by Canada in 2024, and their estimated share of total production of fresh mushrooms in Canada during 2024.

Table 7.1 Fresh mushrooms: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports from Canada, 2024

Country	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
Canada	12	***	***

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 Canada production of fresh mushrooms in 2024. 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. 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 import data reported in the Commission's U.S. importers' questionnaire.

Table 7.2 presents information on the fresh mushrooms operations of the responding producers and exporters in Canada. Most firms reported packaging operations, however ***. As shown in table 7.3, two firms reported reselling fresh mushrooms that were produced by other firms. ***.

[3] These firms were identified through a review of information submitted in the petition.

Table 7.2 Fresh mushrooms: Summary data for producers in Canada in 2024

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Champag	***	***	***	***	***	***
Champs	***	***	***	***	***	***
Farmers' Fresh	***	***	***	***	***	***
Highline	***	***	***	***	***	***
Lincoln	***	***	***	***	***	***
Loveday	***	***	***	***	***	***
Monaghan	***	***	***	***	***	***
Peeters	***	***	***	***	***	***
Piccioni Bros.	***	***	***	***	***	***
Sharon	***	***	***	***	***	***
Wiet Peeters	***	***	***	***	***	***
All individual producers	***	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 7.3 Fresh mushrooms: Summary data for subject resellers in Canada, by firm, 2024

Firm	Resales exported to the United States (1,000 pounds)	Share of resales exported to the United States (percent)
Avina Fresh	***	***
Wiet Peeters	***	***
All individual resellers	***	100.0

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

Table 7.4 presents events in the fresh mushroom industry in Canada since January 1, 2022.

Table 7.4 Fresh mushrooms: Important industry events in Canada since 2022

Item	Firm	Event
Plant closings	Highline Mushrooms	In September 2025, Highline closed its farm in Wellington, Ontario, given the age of the facility.
Government investment	Government of Canada	Agriculture and Agri-Food Canada announced a CAD $344,100 investment in the Canadian Mushroom Growers' Association to support market growth for Canada's mushroom sector.
Acquisition	South Mill Champs	In November 2023, South Mill Champs acquired World Fresh Produce, a global sourcing organization, in order to improve its distribution and logistics networks across the United States and Canada.
Expansions	Highline Mushrooms	Announced in October 2024 that it would be partnering with Christiaens Group to expand and upgrade its farm in Leamington, Ontario. It is expected to be online by mid-2026.
Expansions	South Mill Champs	A new joint venture between Grupo APAL and South Mill Champs to expand mushroom production in Mexico was announced in 2024. The new partnership intends to bring online a new, Dutch-style, facility, encompassing phase 3 compost, mushroom growing farms, and packing operations near Queretaro, Mexico.
Other (labor shortages)	Industry	In 2023, Canada's Agricultural Human Resource Council Employer Survey stated that about 60 percent of mushroom farms could not hire all the workers they needed in 2022.

Sources: Hemmes, "Ontario Mushroom Facility to Close Down," https://www.freshplaza.com/north-america/article/9767610/ontario-mushroom-facility-to-close-down/, accessed December 5, 2025; Government of Canada, "Government of Canada Invests in Market Expansion Opportunities for Canada's Mushroom Sector," https://www.canada.ca/en/agriculture-agri-food/news/2022/04/government-of-canada-invests-in-market-expansion-opportunities-for-canadas-mushroom-sector.html, accessed December 5, 2025; South Mill Champs, "South Mill Champs Strengthens Its Market Presence with the Acquisition of World Fresh Produce," https://southmill.com/blog/south-mill-champs-strengthens-its-market-presence-with-the-acquisition-of-world-fresh-produce/, accessed December 5, 2025; Highline Mushrooms, "Highline Mushrooms Partners with Christiaens Group to Build the Farm of the Future," http://highlinemushrooms.com/highline-mushrooms-partners-with-christiaens-group-to-build-the-farm-of-the-future/, accessed December 5, 2025; The Packer Staff, "South Mill Champs and Grupo APAL Partner to Expand Mushroom Production in Mexico," https://www.thepacker.com/news/produce-crops/south-mill-champs-and-grupo-apal-partner-expand-mushroom-production-mexico, accessed December 5, 2025; Canadian Agricultural Human Resource Council, "Sowing Seeds of Change: Agricultural Labour Market Forecast 2023—2030," https://cahrc-ccrha.ca/sites/default/files/2024-02/CAHRC_LMI-Report_FEB_2024_EN%20%281%29.pdf, accessed December 5, 2025, p. 32.

Changes in operations

Producers in Canada were asked to report any change in the character of their operations or organization relating to the production of fresh mushrooms since 2022. Seven of twelve producers indicated in their questionnaires that they had experienced such changes. Table 7.5 presents the count of changes identified by these producers.

Table 7.5 Fresh mushrooms: Reported changes in operations in Canada since January 1, 2022, by firm

Count in number of firms reporting

Item	Count of responses
Plant openings	1
Plant closings	1
Prolonged shutdowns	1
Production curtailments	2
Relocations	0
Expansions	3
Acquisitions	0
Consolidations	0
Weather-related or force majeure events	2
Other	4
Any change	7

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

Table 7.6 presents narrative responses for the changes in operations identified by producers in Canada.

Table 7.6 Fresh mushrooms: Reported changes in operations in Canada since January 1, 2022, by reported change category firm

Item	Firm name and accompanying narrative response regarding changes in operations
Plant openings	***
Plant closings	***

Item	Firm name and accompanying narrative response regarding changes in operations
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Expansions	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Other	***

Item	Firm name and accompanying narrative response regarding changes in operations
Other	***
Other	***
Other	***

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

Table 7.7 presents narrative responses for anticipated changes in operations identified by producers in Canada.

Table 7.7 Fresh mushrooms: Anticipated changes in operations in Canada, by firm

Item	Subject foreign industry, firm name, and accompanying narrative response regarding anticipated changes in operations
Anticipated changes	***
Anticipated changes	***

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

Installed and practical overall capacity

Table 7.8 presents data on producers' installed capacity, practical overall capacity, and practical fresh mushrooms capacity and production on the same equipment in Canada.[4] While installed overall capacity decreased from 2022 to 2024,[5] practical overall capacity increased. Overall production was similar in 2022 and 2024, with a slight decrease in 2023. This resulted in

[4] The data presented in table 7.8 was requested on the basis of firms' packaging operations. As noted previously, ***.

[5] The decrease was primarily driven by ***.

installed overall capacity utilization increasing by *** percentage points from 2022 to 2024, while practical overall capacity utilization decreased by *** percentage points over the same period.

Table 7.8 Fresh mushrooms: Producers' installed and practical capacity and production on the same equipment as in-scope production in Canada, by period

Capacity and production in 1,000 pounds; utilization in percent; Interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical fresh mushrooms	Capacity	***	***	***	***	***
Practical fresh mushrooms	Production	***	***	***	***	***
Practical fresh mushrooms	Utilization	***	***	***	***	***

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

Constraints on capacity

Table 7.9 presents producers' reported capacity constraints in Canada, by count of responses, since January 1, 2022.

Table 7.9 Fresh mushrooms: Count of reported production constraints in Canada, by type of constraint

Count in number of firms reporting

Type of constraint	Canada
Production bottlenecks	3
Existing labor force	0
Supply of material inputs	6
Fuel or energy	0
Storage capacity	1
Logistics/transportation	1
Other constraints	2

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

Narrative explanations of producers' reported capacity constraints in Canada since January 1, 2022, as noted above, are presented in table 7.10.

Table 7.10 Fresh mushrooms: Producers' reported constraints to practical overall capacity in Canada since January 1, 2022, by constraint and firm

Type of constraint	Subject foreign industry, firm name, and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Storage capacity	***
Logistics/transportation	***
Other constraints	***
Other constraints	***

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

Operations on fresh mushrooms

Table 7.11 presents information on the fresh mushrooms operations of the responding producers and exporters in Canada. Capacity, production, and exports to the United States were all projected to increase in 2025 and 2026 compared to 2024 levels. Shipments from producers in Canada were generally split between home market shipments and exports to the United States in 2022 and 2023, however the share of shipments as exports to the U.S. began to increase slightly in 2024 from previous levels, and is projected to remain at a similar share in 2025 and 2026. As a share of total shipments, few shipments are exported to markets other than the U.S.[6]

[6] Highline exports a small amount of fresh mushrooms via air freight to Japan. Conference transcript, pp. 185 to 186 (Cambon).

Table 7.11 Fresh mushrooms: Data on industry in Canada, by period

Quantity in 1,000 pounds; Interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
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.

Table 7.11 (Continued) Fresh mushrooms: Data on industry in Canada, by period

Shares and ratios in percent; Interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
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
Total exports to the United States by producers	***	***	***	***	***	***	***
Total exports to the United States by resellers	***	***	***	***	***	***	***
Adjusted total shipments exported to the United States	***	***	***	***	***	***	***

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 7.12, responding firms in Canada produced other products on the same equipment and machinery used to produce fresh mushrooms. Production of products other than fresh mushrooms constituted no more than *** percent of the share of total production in any period. Such products include non-*Agaricus* or specialty mushrooms such as shiitake and oyster mushrooms.

Table 7.12 Fresh mushrooms: Producers' overall production on the same equipment as in-scope production in Canada, by product type and period

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

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Fresh mushrooms	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Fresh mushrooms	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

According to GTA, the leading export markets for fresh mushrooms from Canada are the United States and Japan (table 7.13). By volume from 2022 to 2024, the United States was the top export market for fresh mushrooms from Canada, accounting for at least 99.6 percent of Canada's total exports of fresh mushrooms in each period. Japan followed as the second largest export market for Canadian fresh mushrooms, but only accounted for 0.3 percent in each period.

Table 7.13 Fresh mushrooms: Exports from Canada, by destination market and by period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Destination market	Measure	2022	2023	2024
United States	Quantity	143,377	137,249	153,990
Japan	Quantity	494	435	504
All other destination markets	Quantity	65	31	51
Non-U.S. destination markets	Quantity	559	466	555
All destination markets	Quantity	143,936	137,715	154,545
United States	Value	319,535	316,452	352,148
Japan	Value	2,854	3,053	3,013
All other destination markets	Value	813	346	509
Non-U.S. destination markets	Value	3,667	3,400	3,522
All destination markets	Value	323,202	319,852	355,670
United States	Unit value	2.23	2.31	2.29
Japan	Unit value	5.78	7.03	5.98
All other destination markets	Unit value	12.54	11.14	10.03
Non-U.S. destination markets	Unit value	6.56	7.30	6.35
All destination markets	Unit value	2.25	2.32	2.30
United States	Share of quantity	99.6	99.7	99.6
Japan	Share of quantity	0.3	0.3	0.3
All other destination markets	Share of quantity	0.0	0.0	0.0
Non-U.S. destination markets	Share of quantity	0.4	0.3	0.4
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official export statistics under HS subheading 0709.51, as reported by Statistics Canada in the Global Trade Atlas database, accessed September 30, 2025.

Notes: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top followed by the top destination markets in descending order of 2024 quantity.

U.S. inventories of imported merchandise

No importer reported inventories of imported fresh mushrooms.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of fresh mushrooms from Canada after June 30, 2025. Their reported data are presented in table 7.14. Three firms (***) reported arranged imports after this date, all in the third quarter of 2025.

Table 7.14 Fresh mushrooms: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds

Source	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Total
Canada	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

Based on available information, fresh mushrooms from Canada have not been subject to other antidumping or countervailing duty investigations outside the United States.

Information on nonsubject countries

Table 7.15 presents information on global exports, by reporting country and by period.

Table 7.15 Fresh mushrooms: Global exports by exporter and period

Quantity in 1,000 pounds; Value in 1,000 dollars

Exporting country	Measure	2022	2023	2024
United States	Quantity	11,114	7,552	5,076
Canada	Quantity	143,935	137,714	154,543
Poland	Quantity	539,764	525,620	540,228
Ireland	Quantity	95,004	84,491	116,162
Netherlands	Quantity	116,969	101,034	87,200
China	Quantity	40,690	53,016	43,676
United Kingdom	Quantity	22,043	19,915	20,581
Belgium	Quantity	27,667	22,717	19,453
Thailand	Quantity	3,288	16,994	18,658
Lithuania	Quantity	19,742	19,159	18,101
Hungary	Quantity	15,384	11,708	16,780
Spain	Quantity	14,075	15,309	16,445
All other exporters	Quantity	118,435	91,842	65,760
All reporting exporters	Quantity	1,168,108	1,107,073	1,122,665
United States	Value	24,357	16,933	12,985
Canada	Value	323,202	319,852	355,670
Poland	Value	488,875	558,273	603,403
Ireland	Value	112,276	106,000	177,916
Netherlands	Value	163,048	165,431	146,320
China	Value	35,296	47,082	34,710
United Kingdom	Value	21,802	21,699	25,285
Belgium	Value	28,948	28,531	26,192
Thailand	Value	1,877	8,756	11,042
Lithuania	Value	20,296	22,352	22,316
Hungary	Value	16,302	14,239	20,447
Spain	Value	13,260	17,190	19,559
All other exporters	Value	137,594	120,319	80,807
All reporting exporters	Value	1,387,132	1,446,657	1,536,652

Table continued.

Table 7.15 (Continued) Fresh mushrooms: Global exports by exporter and period

Unit values in dollars per pound; Shares in percent

Exporting country	Measure	2022	2023	2024
United States	Unit value	2.19	2.24	2.56
Canada	Unit value	2.25	2.32	2.30
Poland	Unit value	0.91	1.06	1.12
Ireland	Unit value	1.18	1.25	1.53
Netherlands	Unit value	1.39	1.64	1.68
China	Unit value	0.87	0.89	0.79
United Kingdom	Unit value	0.99	1.09	1.23
Belgium	Unit value	1.05	1.26	1.35
Thailand	Unit value	0.57	0.52	0.59
Lithuania	Unit value	1.03	1.17	1.23
Hungary	Unit value	1.06	1.22	1.22
Spain	Unit value	0.94	1.12	1.19
All other exporters	Unit value	1.16	1.31	1.23
All reporting exporters	Unit value	1.19	1.31	1.37
United States	Share of quantity	1.0	0.7	0.5
Canada	Share of quantity	12.3	12.4	13.8
Poland	Share of quantity	46.2	47.5	48.1
Ireland	Share of quantity	8.1	7.6	10.3
Netherlands	Share of quantity	10.0	9.1	7.8
China	Share of quantity	3.5	4.8	3.9
United Kingdom	Share of quantity	1.9	1.8	1.8
Belgium	Share of quantity	2.4	2.1	1.7
Thailand	Share of quantity	0.3	1.5	1.7
Lithuania	Share of quantity	1.7	1.7	1.6
Hungary	Share of quantity	1.3	1.1	1.5
Spain	Share of quantity	1.2	1.4	1.5
All other exporters	Share of quantity	10.1	8.3	5.9
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 0709.51 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed September 30, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—“. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2024 quantity.

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
90 FR 45245, September 19, 2025	Fresh Mushrooms From Canada; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	https://www.govinfo.gov/content/pkg/FR-2025-09-19/pdf/2025-18225.pdf
90 FR 52094, November 19, 2025	Fresh Mushrooms From Canada; Revised Schedule for the Subject Proceeding	https://www.govinfo.gov/content/pkg/FR-2025-11-19/pdf/2025-20312.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared as witnesses at the United States International Trade Commission's preliminary conference:

Subject: Fresh Mushrooms from Canada

Inv. Nos.: 701-TA-778 and 731-TA-1764 (Preliminary)

Date and Time: November 21, 2025 – 9:30 a.m.

Sessions were held in connection with these preliminary phase investigations all virtually via Webex.

EMBASSY APPEARANCE:

Embassy of Canada
Washington, D.C.

Carlos Vanderloo, Minister-Counsellor

OPENING REMARKS:

In Support of Imposition (**John M. Herrmann**, Kelley Drye & Warren LLP)
In Opposition of Imposition (**Daniel L. Porter**, Pillsbury Winthrop Shaw Pittman LLP)

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

Kelley Drye & Warren LLP
Washington, D.C.
on behalf of

Fresh Mushrooms Fair Trade Coalition

David Carroll, Former President,
Giorgi Mushroom Company and Giorgio Fresh Company

Bryan Shelton, Vice President of Sales and Marketing,
Giorgio Fresh Company

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

Pat Jurgensmeyer, Chief Executive Officer, J-M Farms, LLC

Charles Ciarrocchi, Jr., President and Chief Executive Officer,
Modern Mushroom Farms, Inc.

Ron Moule, Chief Operating Officer,
Kennett Square Mushroom Operations LLC

William B. Hudgens, Senior Trade Analyst, Georgetown Economic Services, LLC

Jacob T. Jones, Trade Analyst, Georgetown Economic Services, LLC

John M. Herrmann)
Paul C. Rosenthal) – OF COUNSEL
Joshua R. Morey)

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

Pillsbury Winthrop Shaw Pittman LLP
Washington, D.C.
on behalf of

Canadian Mushroom Growers' Association

Ryan Koeslag, P.Ag., Executive Vice-President, Mushrooms Canada

Lewis Macleod, Chief Executive Officer, South Mill Champs

James Isaac, General Counsel, South Mill Champs

Jose Cambon, Chief Executive Officer, Highline Mushrooms

Peter Vu, Chief Financial Officer, Highline Mushrooms

Khanh Timothy Truong, President, Farmers Fresh Mushrooms

Justin Mclean, Sales Manager, Farmers Fresh Mushrooms

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

Andrew Szamosszegi, Principal, Capital Trade Inc

Travis Pope, Principal, Capital Trade Inc.

Daniel L. Porter)
Stephen E. Becker)
) – OF COUNSEL
William C. Sjoberg)
Gina Colarusso)

Steptoe LLP
Washington, D.C.
on behalf of

Government of Canada

Eric Emerson)
Benjamin Juvelier) – OF COUNSEL
Nicole Arellano-Brillembourg)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Paul C. Rosenthal**, Kelley Drye & Warren LLP)
In Opposition of Imposition (**Gina M. Colarusso**, Pillsbury Winthrop Shaw Pittman LLP)

APPENDIX C

SUMMARY DATA

All U.S. Producers

Table C.1
Fresh mushrooms: 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; Interim period is January through June

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
Importers' share (fn1):									
Canada	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▼***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
Canada	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
Canada:									
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
Fresh mushrooms: 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; Interim period is January through June

Item	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. packers':									
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	***	***	***	***	***	▼***	▼***	▼***	***

Table continued.

Table C.1 Continued

Fresh mushrooms: 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; Interim period is January through June

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. growers':									
Production workers	***	***	***	***	***	▲***	▼***	▲***	▲***
Hours worked (1,000s of hours)	***	***	***	***	***	▼***	▼***	▼***	▲***
Wages paid ($1,000s of dollars)	***	***	***	***	***	▼***	▼***	▲***	▲***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▲***	▼***
Productivity (pounds per hour)	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
Value	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Salaries and labor costs	***	***	***	***	***	▼***	▼***	▲***	▲***
All other operating expenses	***	***	***	***	***	▼***	▼***	▲***	▲***
All operating expenses	***	***	***	***	***	▼***	▼***	▲***	▲***
Operating income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▼***	▲***
Net income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit salaries and labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit all other operating expenses	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit all operating expenses	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit net income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▲***
Salaries and labor costs/sales	***	***	***	***	***	▲***	▼***	▲***	▼***
All other operating expenses/sales	***	***	***	***	***	▲***	▼***	▲***	▼***
All operating expenses/sales	***	***	***	***	***	▲***	▼***	▲***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▲***	▼***	▲***
Net income or (loss) (fn2)/sales	***	***	***	***	***	▼***	▲***	▼***	▲***
U.S. packers and growers':									
Production workers	***	***	***	***	***	▼***	▲***	▼***	▼***
Hours worked (1,000s of hours)	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid ($1,000s of dollars)	***	***	***	***	***	▼***	▲***	▼***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▲***	▼***
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)	***	***	***	***	***	▼***	▼***	▼***	▲***

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

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than " (0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a " ▲" represent an increase, while period changes preceded by a "▼" represent a decrease. Grower only data were accounted for by using their profitablity as an adjustment to U.S. packers total COGS.

Related Party Exclusion

Table C.2
Fresh mushrooms: Summary data concerning the U.S. market excluding two U.S. packers *, by item and period**
Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through June

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1):									
Included producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Excluded producers	***	***	***	***	***	▲***	▲***	▲***	▲***
All producers	***	***	***	***	***	▼***	▲***	▼***	▼***
Importers' share (fn1):									
Canada	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▼***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1):									
Included producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Excluded producers	***	***	***	***	***	▲***	▲***	▲***	▲***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
Canada	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
Canada:									
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.2 Continued

Fresh mushrooms: Summary data concerning the U.S. market excluding two U.S. packers *, by item and period**

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

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
Included U.S. packers':									
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 of hours)	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid ($1,000s of dollars)	***	***	***	***	***	▼***	▲***	▼***	▼***
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	***	***	***	***	***	▼***	▼***	▼***	***

Table continued.

Table C.2 Continued
Fresh mushrooms: Summary data concerning the U.S. market excluding two U.S. packers *, by item and period**
Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through June

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
Included U.S. packers and growers':									
Production workers	***	***	***	***	***	▼***	▲***	▼***	▼***
Hours worked (1,000s)	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid ($1,000)	***	***	***	***	***	▼***	▲***	▼***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▲***	▼***
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)	***	***	***	***	***	▼***	▼***	▼***	▲***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in appendix F and H.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than " (0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a " ▲" represent an increase, while period changes preceded by a "▼" represent a decrease. In the combined included U.S. packers and growers financial data, grower only data were accounted for by using their profitability as an adjustment to included U.S. packer's total COGS.

APPENDIX D

DOMESTIC LIKE PRODUCT NARRATIVE COMPARISONS BY FACTOR

Table D.1 Fresh mushrooms: U.S. producers' narratives comparing genus *Agaricus* fresh mushrooms to out-of-scope fresh mushrooms, by domestic like product factor

Factor	Producer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***

Factor	Producer name and narrative response on comparability
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***

Factor	Producer name and narrative response on comparability
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***

Factor	Producer name and narrative response on comparability
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Producer name and narrative response on comparability
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Producer name and narrative response on comparability
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

Table D.2 Fresh mushrooms: U.S. importers' narratives comparing genus *Agaricus* fresh mushrooms to out-of-scope fresh mushrooms, by domestic like product factor

Factor	Importer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***

Factor	Importer name and narrative response on comparability
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Importer name and narrative response on comparability
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

APPENDIX E

RELATED PARTY EXCLUDED TRADE DATA

Table E.1 Fresh mushrooms: U.S. packers' capacity, production, and utilization excluding two U.S. packers *, by period**

Capacity and production in 1,000 pounds; Utilization in percent; Interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Capacity	***	***	***	***	***
Production	***	***	***	***	***
Utilization	***	***	***	***	***

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 Fresh mushrooms: U.S. packers' total shipments excluding two U.S. packers *, by destination and period**

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent; Interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

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 Fresh mushrooms: U.S. packers' U.S. shipments excluding two U.S. packers *, by type and period**

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent; Interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	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 E.4 Fresh mushrooms: U.S. packers' inventories and their ratio to select items excluding two U.S. packers *, by destination and period**

Quantity in 1,000 pounds; Ratios in percent; Interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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 Fresh mushrooms: U.S. packers' employment related information excluding two U.S. packers *, by item and period**

Interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (pounds per hour)	***	***	***	***	***
Unit labor costs (dollars per pound)	***	***	***	***	***

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

Table E.6 Fresh mushrooms: Combined U.S. producers' employment related information excluding two U.S. packers *, by item and period**

Interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***

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

Table E.7 Fresh mushrooms: Apparent U.S. total market consumption and market shares based on quantity data excluding two U.S. packers *, by source and period**

Quantity in 1,000 pounds; Shares in percent; Interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Included producers	Quantity	***	***	***	***	***
Excluded producers	Quantity	***	***	***	***	***
All producers	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
Included producers	Share	***	***	***	***	***
Excluded producers	Share	***	***	***	***	***
All producers	Share	***	***	***	***	***
Canada	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 “—“.

Table E.8 Fresh mushrooms: Apparent U.S. total market consumption and market shares based on value data excluding two U.S. packers *, by source and period**

Value in 1,000 pounds; Shares in percent; Interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Included producers	Value	***	***	***	***	***
Excluded producers	Value	***	***	***	***	***
All producers	Value	***	***	***	***	***
Canada	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
Included producers	Share	***	***	***	***	***
Excluded producers	Share	***	***	***	***	***
All producers	Share	***	***	***	***	***
Canada	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 “—“.

APPENDIX F

RELATED PARTY EXCLUDED PRICE DATA

Table F.1 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling) excluding two U.S. packers *, by source and quarter**

Price in dollars per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 1: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic.

Table F.2 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling) excluding two U.S. packers *, by source and quarter**

Price in dollars per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 2: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Table F.3 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling) excluding two U.S. packers *, by source and quarter**

Price in dollars per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 3: Browns (creminis or baby bellas), medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Table F.4 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling) excluding two U.S. packers *, by source and quarter**

Price in dollars per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 4: Whites, medium whole, in 5 to 10 pound boxes, marketed as conventional.

Table F.5 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling) excluding two U.S. packers *, by source and quarter**

Price in dollars per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 5: Whites, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Table F.6 Fresh mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling) excluding two U.S. packers *, by source and quarter**

Price in dollars per pound, quantity in 1,000 pounds, margin in percent

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 6: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic.

Figure F.1 Product: Weighted-average prices and quantities of domestic and imported product 1, by quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as organic.

Figure F.2 Fresh mushrooms: Weighted-average prices and quantities of domestic and imported product 2, by quarter, excluding two U.S. packers ***

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Whites, medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Figure F.3 Fresh mushrooms: Weighted-average prices and quantities of domestic and imported product 3, by quarter, excluding two U.S. packers ***

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Browns (creminis or baby bellas), medium whole, in 8-ounce 6-, 10-, or 12-packs, marketed as conventional.

Figure F.4 Fresh mushrooms: Weighted-average prices and quantities of domestic and imported product 4, by quarter, excluding two U.S. packers ***

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Whites, medium whole, in 5 to 10 pound boxes, marketed as conventional.

Figure F.5 Fresh mushrooms: Weighted-average prices and quantities of domestic and imported product 5, by quarter, excluding two U.S. packers ***

Price of product 5

* * * * * * *

Volume of product 5

* * * * * * *

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

Note: Product 5: Whites, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Figure F.6 Fresh mushrooms: Weighted-average prices and quantities of domestic and imported product 6, by quarter, excluding two U.S. packers ***

Price of product 6

* * * * * * *

Volume of product 6

* * * * * * *

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

Note: Product 6: Brown, large whole, 24-ounce, 6-pack, marketed as conventional or organic.

Table F.7 Fresh mushrooms: Instances and quantities of underselling/overselling and the range and average of margins excluding two U.S. packers *, by product**

Quantity in 1,000 pounds; margin in percent

Products	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	14	***	***	***	***
Product 2	Underselling	14	***	***	***	***
Product 3	Underselling	14	***	***	***	***
Product 4	Underselling	8	***	***	***	***
Subtotal, products 1-4	Underselling	50	***	***	***	***
Product 5	Underselling	—	***	***	***	***
Product 6	Underselling	2	***	***	***	***
Subtotal, products 5-6	Underselling	2	***	***	***	***
All products	Underselling	52	***	***	***	***
Product 1	Overselling	—	***	***	***	***
Product 2	Overselling	—	***	***	***	***
Product 3	Overselling	—	***	***	***	***
Product 4	Overselling	6	***	***	***	***
Subtotal, products 1-4	Overselling	6	***	***	***	***
Product 5	Overselling	14	***	***	***	***
Product 6	Overselling	12	***	***	***	***
Subtotal, products 5-6	Overselling	26	***	***	***	***
All products	Overselling	32	***	***	***	***

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

Table F.8 Fresh mushrooms: Instances and quantities of underselling/overselling and the range and average of margins excluding two U.S. packers *, by product**

Quantity in 1,000 pounds; margin in percent

Period	Product grouping	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2022	Products 1-4	Underselling	16	***	***	***	***
2023	Products 1-4	Underselling	16	***	***	***	***
2024	Products 1-4	Underselling	12	***	***	***	***
January through June 2025	Products 1-4	Underselling	6	***	***	***	***
All periods	Products 1-4	Underselling	50	***	***	***	***
2022	Products 1-4	Overselling	—	***	***	***	***
2023	Products 1-4	Overselling	—	***	***	***	***
2024	Products 1-4	Overselling	4	***	***	***	***
January through June 2025	Products 1-4	Overselling	2	***	***	***	***
All periods	Products 1-4	Overselling	6	***	***	***	***
2022	Products 5-6	Underselling	2	***	***	***	***
2023	Products 5-6	Underselling	—	***	***	***	***
2024	Products 5-6	Underselling	—	***	***	***	***
January through June 2025	Products 5-6	Underselling	—	***	***	***	***
All periods	Products 5-6	Underselling	2	***	***	***	***
2022	Products 5-6	Overselling	6	***	***	***	***
2023	Products 5-6	Overselling	8	***	***	***	***
2024	Products 5-6	Overselling	8	***	***	***	***
January through June 2025	Products 5-6	Overselling	4	***	***	***	***
All periods	Products 5-6	Overselling	26	***	***	***	***
2022	All products	Underselling	18	***	***	***	***
2023	All products	Underselling	16	***	***	***	***
2024	All products	Underselling	12	***	***	***	***
January through June 2025	All products	Underselling	6	***	***	***	***
All periods	All products	Underselling	52	***	***	***	***
2022	All products	Overselling	6	***	***	***	***
2023	All products	Overselling	8	***	***	***	***
2024	All products	Overselling	12	***	***	***	***
January through June 2025	All products	Overselling	6	***	***	***	***
All periods	All products	Overselling	32	***	***	***	***

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

APPENDIX G

RELATED PARTY EXCLUDED FINANCIAL DATA

Table G.1 Fresh mushrooms: Integrated U.S. producers/packers results of operations excluding two integrated U.S. producers/packers *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; unit values in dollars per pound; count in number of firms reporting; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	6	6	6	6	5

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

Table G.2 Fresh mushrooms: Integrated U.S. producers/packers changes in AUVs between comparison periods excluding two integrated U.S. producers/packers *

Changes in percent; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

Table G.2 (Continued) Fresh mushrooms: U.S. packers' changes in AUVs between comparison periods excluding two U.S. packers *

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▼***
SG&A expense	▲***	▲***	▼***	▼***
Operating income or (loss)	▼***	▼***	▼***	▼***
Net income or (loss)	▼***	▼***	▼***	▲***

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

Note: Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Table G.3 Fresh mushrooms: Combined integrated U.S. producers/packers and independent U.S. growers' results of operations excluding two integrated U.S. producers/packers *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***

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

Note: Independent U.S. growers data were accounted for by adding the absolute value of their net profitability as an adjustment to integrated U.S. producers/packers total COGS.

Table G.4 Fresh mushrooms: Combined Integrated U.S. producers/packers and independent U.S. growers' changes in AUVs between comparison periods excluding integrated U.S. producers/packers ***

Changes in percent; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

Table G.4 (Continued) Fresh mushrooms: Combined U.S. packers' and independent growers' changes in AUVs between comparison periods excluding two U.S. packers ***

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲***	▲***	▼***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▼***
SG&A expense	▲***	▲***	▼***	▼***
Operating income or (loss)	▼***	▼***	▼***	▲***
Net income or (loss)	▲***	▼***	▲***	▼***

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

Note: Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.