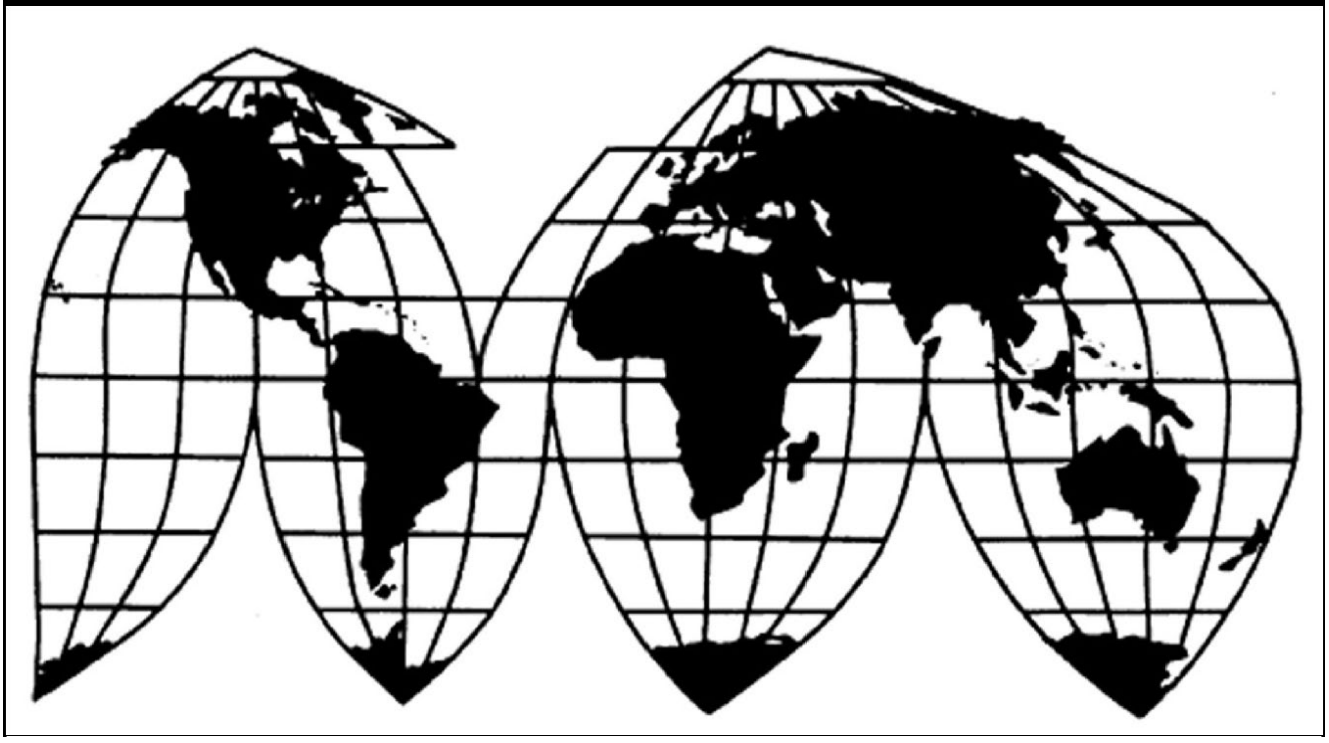
Citric Acid and Certain Citrate Salts from Canada and India

Investigation Nos. 701-TA-783–784 and 731-TA-1771–1772 (Preliminary)

Publication 5716 **March 2026**

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Note.—Information that would reveal confidential operations of individual firms may not be published.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-783-784 and 731-TA-1771-1772 (Preliminary)

Citric Acid and Certain Citrate Salts from Canada and India

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 citric acid and certain citrate salts from Canada and India, provided for in subheadings 2918.14.00, 2918.15.10, 2918.15.50, and 3824.99.93 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 and India that are alleged to be subsidized by the governments of Canada and India.[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

[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 7252 and 7257 (February 17, 2026).

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, 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 January 21, 2026, Archer-Daniels-Midland Company, Decatur, Illinois; Cargill, Incorporated, Wayzata, Minnesota; and Primary Products Ingredients Americas LLC, Schaumburg, Illinois, 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 citric acid and certain citrate salts from Canada and India and LTFV imports of citric acid and certain citrate salts from Canada and India. Accordingly, effective January 21, 2026, the Commission instituted countervailing duty investigation Nos. 701-TA-783-784 and antidumping duty investigation Nos. 731-TA-1771-1772 (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 January 26, 2026 (91 FR 3221). The Commission conducted its conference on February 11, 2026. All persons who requested the opportunity were permitted to participate.

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 citric acid and certain citrate salts ("CACCS") from Canada and India that are allegedly sold in the United States at less than fair value and subsidized by the governments of Canada and India.

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

Archer-Daniels-Midland Company ("ADM"), Cargill, Incorporated ("Cargill"), and Primary Products Ingredients Americas LLC ("Primient"), U.S. producers of CACCS, filed the petitions in these investigations on January 21, 2026. Petitioners appeared at the staff conference and submitted a postconference brief.

Respondents Jungbunzlauer Canada Inc. ("JBL Canada"), a producer of CACCS in Canada, and Jungbunzlauer Inc. ("JBL Inc."), a U.S. importer of subject merchandise from JBL Canada (collectively, "JBL"), participated in these investigations. JBL appeared at the staff conference

[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 State*s, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

and submitted a postconference brief. No importer or producer of subject merchandise from India has appeared in this proceeding.

U.S. industry data are based on the questionnaire responses of three domestic producers, accounting for all known U.S. production of CACCS in 2024.[3] U.S. import data are based on official import statistics from the U.S. Department of Commerce ("Commerce"), except for imports from Canada, which are based on proprietary, Census-edited Customs records.[4] The Commission received usable questionnaire responses from 12 U.S. importers, representing *** percent of U.S. imports from Canada and *** percent of U.S. imports from India in 2024 under HTS statistical reporting numbers 2918.14.0000, 2918.15.1000, and 2918.15.5000.[5] The Commission received a response from one producer/exporter from Canada, estimated to account for *** percent of production of subject merchandise from Canada in 2024; this firm's exports of subject merchandise are estimated to account for *** percent of U.S. imports from Canada in 2024.[6] It received responses from five producers/exporters from India, estimated to account for *** percent of production of subject merchandise from India in 2024; these firms' exports of subject merchandise are estimated to account for *** percent of U.S. imports from India in 2024.[7]

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 "industry."[8] 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

[3] Confidential Report, Memorandum INV-YY-032 (March 2, 2026) ("CR") at 1.4; Public Report, *Citric Acid and Certain Citrate Salts from Canada and India,* Inv. Nos. 701-TA-783-784 and 731-TA-1771-1772 (Preliminary), USITC Pub. 5716 (March 2026) ("PR") at 1.4.

[4] CR/PR at 1.5. Staff used proprietary customs records for U.S. imports from Cananda because official import statistics for U.S. imports from Canada are suppressed for quantity data because these data are dominated by one firm.

[5] CR/PR at 4.1. Blends that include citric acid, sodium citrate, and potassium citrate are imported under statistical reporting number 3824.99.9397. CR/PR at 1.8 n.10.

[6] CR/PR at Table 7.1.

[7] CR/PR at Table 7.1.

[8] 19 U.S.C. § 1677(4)(A).

proportion of the total domestic production of the product."[9] 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."[10]

By statute, the Commission's "domestic like product" analysis begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by Commerce.[11] 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."[12] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[13] 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.[14] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[15] The

[9] 19 U.S.C. § 1677(4)(A).

[10] 19 U.S.C. § 1677(10).

[11] 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).

[12] *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).

[13] *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).

[14] *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).

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

Commission looks for clear dividing lines among possible like products and disregards minor variations.[16] The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.[17]

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as follows:

> The merchandise covered by these investigations includes all grades and granulation sizes of citric acid, sodium citrate, and potassium citrate in their unblended forms, whether dry or in solution, and regardless of packaging type. The scope also includes blends of citric acid, sodium citrate, and potassium citrate, as well as blends with other ingredients, such as sugar, where the unblended form(s) of citric acid, sodium citrate, and potassium citrate constitute 40 percent or more, by weight, of the blend.
>
> The scope also includes all forms of crude calcium citrate, including dicalcium citrate monohydrate, and tricalcium citrate tetrahydrate, which are intermediate products in the production of citric acid, sodium citrate, and potassium citrate. The scope includes the hydrous and anhydrous forms of citric acid, the dihydrate and anhydrous forms of sodium citrate, otherwise known as citric acid sodium salt, and the monohydrate and monopotassium forms of potassium citrate. Sodium citrate also includes both trisodium citrate and monosodium citrate which are also known as citric acid trisodium salt and citric acid monosodium salt, respectively.

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[16] *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.").

[17] *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).

> The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing or removing additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the subject country. The scope also includes merchandise matching the above description that is commingled or blended with citric acid, sodium citrate, and potassium citrate from sources not subject to these investigations. Only the subject component of such commingled products is covered by the scope of these investigations.
>
> The scope does not include calcium citrate that satisfies the standards set forth in the United States Pharmacopeia and has been mixed with a functional excipient, such as dextrose or starch, where the excipient constitutes at least two percent, by weight, of the product.
>
> Citric acid and sodium citrate are classifiable under 2918.14.0000 and 2918.15.1000 of the Harmonized Tariff Schedule of the United States (HTSUS), respectively. Potassium citrate and crude calcium citrate are classifiable under 2918.15.5000 and, if included in a mixture or blend, 3824.99.9397 of the HTSUS. Blends that include citric acid, sodium citrate, and potassium citrate are classifiable under 3824.99.9397 of the HTSUS. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise is dispositive.[18]

The CACCS products subject to these investigations include citric acid, sodium citrate, and potassium citrate, blends containing CACCS, and crude calcium citrate. CACCS products have only minor molecular differences that do not significantly alter their essential characteristics or uses.[19] Citric acid, sodium citrate, and potassium citrate are all sold as

[18] *Citric Acid and Certain Citrate Salts from Canada and India: Initiation of Less-Than-Fair Value Investigations*, 91 Fed. Reg. 7252, 7256 (Feb. 17, 2026); *Citric Acid and Certain Citrate Salts from Canada and India: Initiation of Countervailing Duty Investigations*, 91 Fed. Reg. 7257, 7260-7261 (Feb. 17, 2026).

[19] CR/PR at 1.11.

odorless, translucent crystals.[20] CACCS products are available in both dry form (granular, fine, and powder) and in aqueous solutions.[21]

Citric acid, sodium citrate, and potassium citrate are chemical products used in the production and formulation of a wide variety of foods, beverages, pharmaceuticals, and cosmetics as well as commercial and household products, including detergents and cleaners.[22] CACCS products can also be used in industrial applications, including metal finishing and cleaning, textile finishing treatments, production of plasticizers, and other industrial applications.[23]

Petitioners' Arguments. Petitioners argue that the Commission should define a single domestic like product consisting of all CACCS covered by the scope.[24] They state that all forms of in-scope CACCS have similar physical characteristics and end uses, and that the liquid and dry forms of CACCS can easily be converted to the other.[25] Petitioners contend that all forms of CACCS are made in the same manufacturing facilities, using the same production processes and employees.[26] Petitioners argue that all forms of CACCS can be considered to be broadly interchangeable, stating that the monohydrate and anhydrous forms of citric acid are completely interchangeable, as are the dihydrate and anhydrous forms of sodium citrate.[27]

Petitioners assert that domestic producers sell a *** of their CACCS sales to ***, with some sales going to ***.[28] They argue that producers and customers view citric acid, sodium citrate, and potassium citrate as a single product category, adding that the three petitioning domestic producers all treat citric acid and citrate salts as a single product category in their product literature.[29] Petitioners contend that because of the similar characteristics of all forms of CACCS, their prices tend to be influenced by the same factors and typically move together in response to changes in supply and demand.[30]

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[20] CR/PR at 1.11.

[21] CR/PR at 2.1.

[22] Petitioners state that crude calcium citrate is an intermediate product created during the production of citric acid, with no commercial application other than the production of citric acid. Petitioners' Postconference Brief, Exh. 1, Response to Staff Questions, at 5.

[23] CR/PR at 1.11-1.13, 2.1.

[24] Petitioners' Postconference Brief at 7-13.

[25] Petitioners' Postconference Brief at 10.

[26] Petitioners' Postconference Brief at 11.

[27] Petitioners' Postconference Brief at 11.

[28] Petitioners' Postconference Brief at 11-12.

[29] Petitioners' Postconference Brief at 12.

[30] Petitioners' Postconference Brief at 12.

Respondent's Arguments. JBL states that it accepts petitioners' proposed definition of the domestic like product.[31]

A. Analysis

Based on the record, we define a single domestic like product consisting of CACCS, coextensive with Commerce's scope.

Physical Characteristics and Uses. All forms of CACCS share similar chemistries and characteristics, and typically appear as odorless, translucent crystals available in either dry form or dissolved in water.[32] As noted, CACCS is used in a broad range of applications, including manufacture and formulation of a wide variety of foods, beverages, pharmaceutical and cosmetics, as well as commercial and household products such as detergents, and industrial uses.[33] While the three primary forms of CACCS (citric acid, sodium citrate, and potassium citrate) share many applications, each possesses distinct characteristic and primary functions that make it preferable for specific uses. For example, citric acid is utilized as an acidulant, preservative, and flavor enhancer; sodium citrate is valued for its buffering, chelating, and emulsifying properties; and potassium citrate is frequently used in pharmaceuticals as an antacid.[34]

Manufacturing Facilities, Production Processes and Employees. The record indicates that it is common for the same manufacturing facilities and the same workers to produce both citric acid and citrate salts, such as sodium citrate and potassium citrate, often using the same equipment.[35]

Channels of Distribution. Domestically produced CACCS is sold primarily to food and beverage end users, followed by distributors and industrial end users. Between 2022 and 2024, the share of U.S. producers' U.S. shipments going to food and beverage end users ranged from *** percent to *** percent; the share going to distributors ranged from *** percent to *** percent; and the share going to industrial end users ranged from *** percent to *** percent.[36]

Interchangeability. According to petitioners, all forms of CACCS are used for the same purposes in the same range of end uses, and thus all forms of CACCS are broadly

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[31] JBL's Postconference Brief at 3; Conference Tr. at 96 (Waite).

[32] CR/PR at 1.11; Conference Tr. at 23 (Kroese); Petitioners' Postconference Brief at 10.

[33] CR/PR at 1.11, 2.1; Conference Tr. at 23-24 (Kroese); Petitioners' Postconference Brief at 10-11.

[34] Conference Tr. at 23-24 (Kroese).

[35] Conference Tr. at 25 (Kroese); CR/PR at 1.15; Petitioners' Postconference Brief at 11.

[36] CR/PR at 2.3, Table 2.1.

interchangeable.[37] Since citric acid varies only in particle size and moisture, in almost all cases, different types of citric acid, whether anhydrous, monohydrate, or solution, are highly interchangeable.[38] A majority of responding purchasers reported that in-scope citric acid, sodium citrate, potassium citrate, and crude calcium citrate are never interchangeable with each other.[39]

Producer and Customer Perceptions. The three petitioning domestic producers of CACCS all treat citric acid and citrates as a single product category in their product literature, indicating that producers perceive CACCS as a single product category.[40] There is no specific information in the record regarding customer perceptions.

Price. Petitioners contend that prices for CACCS products tend to be influenced by the same factors and typically move together in response to changes in supply and demand, given their similar chemical characteristics, production processes, and inputs.[41] Pricing data reported by U.S. producers for the four pricing products, which accounted for 43.9 percent of U.S. producers' U.S. shipments of CACCS in 2024, reflect prices fluctuating within a band from $*** per pound dry weight to $*** per pound dry weight.[42] U.S. producers' prices of products 1 and 2 (citric acid products) are *** with prices for products 3 and 4 (sodium citrate products) for much of the POI.[43]

Conclusion. The record indicates that all forms of CACCS have similar physical characteristics and have a broad range of end uses, as indicated in the different channels of distribution for domestically produced CACCS. Although different forms of CACCS are not interchangeable in all applications, they are used for similar functions in some of the same types of end-use products as buffers, acidulants, and preservatives. In addition, all forms of CACCS are frequently manufactured in the same production facility with the same employees and the same equipment. Domestic producers view CACCS as a single product category and prices for specific products overlap and appear to move in the same bands. Accordingly, and in

[37] Petitioners' Postconference Brief at 11.

[38] Conference Tr. at 25-26 (Kroese); Petitioners' Postconference Brief at 11.

[39] CR/PR at 2.1.

[40] Petitions, Vol. 1, at 25 and Exhs. I-14 through I-16.

[41] Petitioners' Postconference Brief at 12.

[42] CR/PR at 5.5 and Table 5.8. Specifically, U.S. producers' prices for the Commission's individual pricing products fluctuated between $*** and $*** per pound dry weight for product 1, between $*** and $*** per pound dry weight for product 2, between $*** and $*** per pound dry weight for product 3, and between $*** and $*** per pound dry weight for product 4. *Id.* at Table 5.8.

[43] CR/PR at Tables 5.4–5.7.

the absence of any argument to the contrary, we define a single domestic like product consisting of all CACCS, coextensive with the scope.

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."[44] 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.

Petitioners argue that the domestic industry should be defined to include all domestic producers of CACCS: ADM, Cargill, and Primient.[45] JBL stated that it does not contest petitioners' proposed definition of the domestic industry.[46] The record does not indicate that any domestic producer is related to a foreign producer or exporter of the subject merchandise pursuant to 19 U.S.C. § 1677(4)(B)(ii), or directly imported the subject merchandise during the January 2022 to September 2025 period of investigation ("POI").[47] [48]

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

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

[44] 19 U.S.C. § 1677(4)(A).

[45] Petitioners' Postconference Brief at 13-14.

[46] Conference Tr. at 96 (Waite).

[47] *See* CR/PR at 3.1, 3.12. *** purchased imports from *** imported by ***. However, because *** purchases of subject imports from *** accounted for *** share of *** imports throughout the period of investigation, the record indicates that *** did not control a predominant share of *** imports so as to implicate a control relationship under the related parties provision of the statue. CR/PR at Table 3.12.

[48] In addition to the foregoing, Commissioner Kearns notes that, even if *** were considered a related party, its exclusion would not be appropriate. For example, its purchased imports were equivalent to at most *** percent of its domestic production, and there is no evidence that *** domestic production operations benefitted or were shielded from the effect of subject import to an extent that its inclusion would mask injury. *See* CR/PR at Table 3.12.

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.[49] The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.[50] In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.[51]

Petitioners' Arguments. Petitioners argue that subject imports from both Canada and India are not negligible for purposes of the Commission's present material injury determination, contending that imports from both countries are well above the three-percent negligibility threshold.[52]

With respect to the issue of whether there is production of CACCS in India and in response to JBL's arguments (see below), petitioners state that they are concerned about possible evasion of duties under the AD/CVD orders on CACCS from China by transshipment of CACCS from China through India. They assert that in December 2025, in response to a request from Commerce, U.S. Customs and Border Patrol ("CBP") imposed interim measures under the Enforce and Protect Act ("EAPA") on U.S. importer Daffodil Pharmachem Private Limited ("Daffodil"), based on reasonable suspicion that Daffodil evaded the AD/CVD orders on CACCS from China by illicitly transshipping CACCS of Chinese origin through India and falsely declaring them to be of Indian origin.[53] However, petitioners argue that since neither Commerce nor CBP, the agencies authorized by Congress to determine such issues, has issued a definitive ruling on duty evasion occurring during the POI, there is no basis for the Commission to make its own determination on whether imports declared (or certified in a questionnaire response)

[49] 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B).

[50] 19 U.S.C. § 1677(24)(A)(ii).

[51] 19 U.S.C. § 1677(24)(B). Neither Canada nor India are on USTR's list of developing countries for purposes of applicability of the 4 percent and 9 percent negligibility limits. *See Designations of Developing Countries and Least Developed Countries Under the Countervailing Duty Law,* 85 Fed. Reg. 7613 (USTR Feb. 10, 2020).

[52] Petitioners' Postconference Brief at 15 and n.66.

[53] Petitions, Vol. 1, at 7 and Exh I-4; Petitioners' Postconference Brief, Exh. 1, Response to Staff Questions, at 13-14.

to be CACCS from India are in fact covered by the AD/CVD orders on CACCS from China.[54] Petitioners also argue that it is for Commerce or CBP to determine whether processing of Chinese citric acid into citrate salts in India is sufficient to establish Indian origin for purposes of assessing AD/CVD duties. They further assert that available data show that India also imports some citric acid from sources other than China.[55]

Petitioners further contend that the record indicates that citric acid production in India may be ongoing, as indicated in official import statistics showing that U.S. importers have declared India to be the country of origin for millions of pounds of imports under the HTSUS subheading specific to citric acid (as well additional imports of citrate salts). They also contend that foreign producer questionnaire responses indicate that the Indian industry produced ***. They argue that the Commission should not attempt to adjust official import statistics or questionnaire data regarding imports of CACCS from India in the absence of a definitive ruling from CBP or Commerce.[56]

Respondent's Arguments. JBL contends that there are no imports of subject merchandise from India, or, at most, import volumes that are negligible, and that the Commission should accordingly find that imports from India are negligible.[57] JBL argues that there is "overwhelming" evidence that there is no production of citric acid in India, and contends that petitioners agree.[58] It asserts that any citric acid that is processed into citrate salts in India is based on citric acid feedstock coming from a third country, primarily if not exclusively China, and that the country of origin of imports of such citrate salts from India remains the country of origin of the citric acid feedstock. JBL claims that in 2018 CBP ruled that citric acid (in monohydrate form) that was further processed into another form of citric acid (anhydrous form) in India did not undergo a substantial transformation, and thus was not a product of India as declared, and remained a product of the country where the citric acid was

[54] Petitioners' Postconference Brief, Exh. 1, Response to Staff Questions, at 14-15.
[55] Petitioners' Postconference Brief, Exh. 1, Response to Staff Questions, at 15.
[56] Petitioners' Postconference Brief, Exh. 1, Response to Staff Questions, at 15-16.
[57] JBL's Postconference Brief at 14.
[58] JBL's Postconference Brief at 10-11. At the conference, petitioners' counsel stated that he did not know of any Indian producers of citric acid, but declined to state that there was no citric acid production in India. Conference Tr. at 68-69 (McLain). As noted above, in their postconference brief, petitioners assert that there is evidence that there may be production of citric acid in India. Petitioners' Postconference Brief, Exh. 1, Response to Staff Questions, at 15-16.

produced, and that the importers should be assessed AD/CVD duties under the orders on China.[59]

JBL asserts that in light of CBP's imposition of interim measures in the EAPA proceeding on Daffodil's entries of sodium citrate from India and preliminary determination that there is reasonable suspicion that the suspended entries are Chinese-origin sodium citrate, the Commission should exclude those shipments from its calculation of the volume of subject imports from India.[60] JBL argues that the Commission accordingly cannot rely on official import statistics or foreign producer questionnaire responses from firms that purport to be Indian producers of CACCS, and should conclude that there are no, or at most only negligible, imports of subject merchandise from India.[61] JBL acknowledges that the challenges to the veracity of any data relating to imports of CACCS from India may not be fully resolved for purposes of these preliminary investigations.[62]

Analysis. As both parties agree, in December 2025, in response to a request from Commerce,[63] CBP initiated an investigation, found that reasonable suspicion exists that importer Daffodil entered covered merchandise into the United States through evasion of the AD/CVD orders on CACCS from China, and imposed interim measures.[64] We find that these actions do not by themselves resolve the issue of whether imports of sodium citrate into the United States reported by Daffodil as of Indian origin are in fact of Chinese origin. The record contains no evidence that CBP or Commerce reached a final decision on the matter.[65] With respect to citric acid, Indian producer *** reports that it developed a fermentation technology to produce citric acid from sugar in *** and all of its citric acid exported to the United States

[59] JBL's Postconference Brief at 11-12. JBL's brief does not attach the CBP determinations, but rather the complaints filed in the U.S. Court of International Trade by the importers challenging those determinations, and states that these appeals are still pending. *Id.* at 12 and n.31 and Exhs. 5-6. Petitioners' counsel also referenced the 2018 CBP determination at the conference. Conference Tr. at 47 (McLain).

[60] JBL's Postconference Brief at 12-14 and Exh. 7.

[61] JBL's Postconference Brief at 14.

[62] JBL's Postconference Brief at 15 n.37, 19, 22.

[63] Commerce alleged that an Indian supplier purchased citric acid that was produced in China, processed the citric acid into sodium citrate in India, and then imported the sodium citrate into the United States claiming it to be of Indian origin, thus evading payment of AD/CVD duties under the orders on CACCS from China. JBL's Postconference Brief, Exh. 7, at 2.

[64] *See* JBL's Postconference Brief, Exh. 7, at 1, 5.

[65] *See* Conference Tr. at 47 (McLain); Petitioners' Postconference Brief, Response to Staff Questions, at 14-16.

beginning in *** was made using this fermentation technology.[66] Thus, CBP's 2018 ruling is not dispositive as to current production of citric acid *** in India. Accordingly, for purposes of the preliminary phase of these investigations, we decline to disregard data on imports from India in official import statistics and questionnaires.

Therefore, we find that the proprietary, Census-edited Customs records with respect to imports from Canada and official import statistics from Commerce with respect to all other countries are the best information available for the volumes of imports in these preliminary investigations.[67] As reflected in these data, imports from Canada accounted for *** percent of total imports of CACCS by quantity from January 2025 through December 2025, the 12-month period prior to the filing of the petitions, while imports from India accounted for *** percent.[68] Accordingly, we find that imports from both Canada and India are not negligible.

VI. Cumulation

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

(1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;

(2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;

(3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

[66] CR/PR at 7.16 n.11. *** reports that ***, the firm used a different production method utilizing purchased citric acid monohydrate. *Id*.

[67] CR/PR at 1.5.

[68] CR/PR at Table 4.3.

(4) whether the subject imports are simultaneously present in the market.[69]

While no single factor is necessarily determinative, and the list of factors is not exhaustive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.[70] Only a "reasonable overlap" of competition is required.[71]

Petitioners argue that the Commission should cumulate subject imports from Canada and India for its analysis of present material injury. They contend that subject imports from Canada and India and the domestic like product are fungible, since all forms of CACCS share the same basic chemical and physical characteristics, and responding domestic producers and importers reported that CACCS from all three sources are generally interchangeable.[72] Petitioners further argue that the domestic like product and subject imports from Canada and India were all sold in the same channels of distribution and in the same geographic regions during the POI, and were simultaneously present in the U.S. market during the POI.[73]

JBL argues that cumulation of subject imports from Canada and India is not warranted, based on its argument that subject imports from India are negligible, an argument we have rejected for purposes of these preliminary investigations.[74]

A. Analysis

We consider subject imports from Canada and India on a cumulated basis, because the statutory criteria for cumulation appear to be satisfied. As an initial matter, petitioners filed

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[69] *See Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-80 (Final), USITC Pub. 1845 (May 1986), *aff'*d, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

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

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

[72] Petitioners' Postconference Brief at 15-17.

[73] Petitioners' Postconference Brief at 17-18.

[74] JBL's Postconference Brief at 10-14.

the antidumping/countervailing duty petitions with respect to both countries on the same day, January 21, 2026.[75]

Fungibility. All responding U.S. producers and a majority of responding importers reported that the domestic like product, subject imports from Canada, and subject imports from India are always interchangeable.[76] In addition, U.S. producers, importers of subject merchandise from Canada, and importers of subject merchandise from India each reported U.S. shipments of pricing products 1 and 3 in all 15 quarters of the POI, indicating head-to-head competition between them.[77]

Channels of Distribution. The domestic like product is sold primarily to food and beverage end users, followed by distributors and industrial end users.[78] Subject imports from Canada went primarily to ***.[79] Subject imports from India went primarily to distributors, with smaller ***.[80] Thus, the record indicates that there is overlap between domestically produced CACCS, subject imports from Canada, and subject imports from India with respect to sales to distributors and ***.

Geographic Overlap. The domestic like product, subject imports from Canada, and subject imports from India were all sold in all regions in the contiguous United States.[81]

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[75] CR/PR at 1.1.

[76] CR/PR at Tables 2.7, 2.8.

[77] CR/PR at Table 5.8. U.S. producers and importers of subject merchandise from Canada each reported U.S. shipments of pricing product 4 in all 15 quarters of the POI, while importers of subject merchandise from India reported U.S. shipments of pricing product 4 in 11 of 15 quarters of the POI. *Id.* U.S. producers and importers of subject merchandise from Canada each reported U.S. shipments of pricing product 2 in all 15 quarters of the POI, while importers of subject merchandise from India did not report any U.S. shipments of pricing product 2 during the POI. *Id.*

[78] Between 2022 and 2024, the share of U.S. producers' U.S. shipments going to food and beverage end users ranged from *** percent to *** percent; the share going to distributors ranged from *** percent to *** percent; and the share going to industrial end users ranged from *** percent to *** percent. CR/PR at 2.3, Table 2.1.

[79] Between 2022 and 2024, the share of U.S. shipments of subject imports from Canada going to food and beverage end users ranged from *** percent to *** percent; the share going to distributors ranged from *** percent to *** percent; and the share going to industrial end users ranged from *** percent to *** percent. CR/PR at Table 2.1.

[80] Between 2022 and 2024, the share of U.S. shipments of subject imports from India going to food and beverage end users ranged from *** percent to *** percent; the share going to distributors ranged from *** percent to *** percent; and the share going to industrial end users was *** percent. CR/PR at 2.3, Table 2.1.

[81] CR/PR at 2.4, Table 2.2.

Simultaneous Presence in Market. Subject imports from Canada and India were each present in the U.S. market in all 45 months of the January 2022 to September 2025 period.[82] The domestic like product was also present in the U.S. market throughout the POI.[83]

Conclusion. The record in the preliminary phase of these investigations indicates that subject imports from both subject sources are reasonably fungible with the domestic like product and each other, and that subject imports from both subject sources and the domestic like product are sold in overlapping channels of distributions and similar geographic markets, and have been simultaneously present in the U.S. market. Because there is a reasonable overlap of competition between and among subject imports from Canada and India and the domestic like product, we cumulate subject imports from Canada and India for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

VII. 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.[84] 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.[85] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[86] 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.[87] No single factor

[82] CR/PR at 4.14, Table 4.7.

[83] *See* CR/PR at Tables 5.4 to 5.7.

[84] 19 U.S.C. §§ 1671b(a), 1673b(a).

[85] 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).

[86] 19 U.S.C. § 1677(7)(A).

[87] 19 U.S.C. § 1677(7)(C)(iii).

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."[88]

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,[89] 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.[90] 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.[91]

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.[92] In performing its examination, however, the Commission need not isolate

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[88] 19 U.S.C. § 1677(7)(C)(iii).

[89] 19 U.S.C. §§ 1671b(a), 1673b(a).

[90] *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).

[91] 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, 1381 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that "this court requires evidence in the record 'to show that the harm occurred "by reason of" the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.'" *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass'n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

[92] SAA at 851-52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. 96-249 at 75 (1979) (the Commission "will consider information which indicates that harm is caused by factors other than less-
(Continued…)

the injury caused by other factors from injury caused by unfairly traded imports.[93] 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.[94] It is clear that the existence of injury caused by other factors does not compel a negative determination.[95]

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."[96] The Commission ensures that it has "evidence in the record" to "show that the

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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.

[93] 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.").

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

[95] *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.").

[96] *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*
(Continued…)

harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports." [97] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[98]

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.[99] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[100]

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

U.S. demand for CACCS depends on the demand for U.S.-produced downstream products in which it is used. Reported end uses include food and beverages, such as confectionery and carbonated soft drinks; detergents; household descalers; insulation; and pharmaceuticals.[101]

The parties agree that demand for CACCS is seasonal, and is higher in the spring and summer months when demand for soft drinks and other beverage applications is at its

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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*.

[97] *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.

[98] *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.").

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

[100] *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.").

[101] CR/PR at 2.7; Conference Tr. at 30-31 (Butler).

highest.[102] They also agree that that the U.S. market for CACCS is a "mature" one in which demand tends to grow moderately and fairly steadily over time.[103] Most responding U.S. producers and importers reported that U.S. demand increased or fluctuated upward during the POI.[104]

Apparent U.S. consumption declined by *** percent between 2022 and 2024, declining from *** pounds dry weight in 2022 to *** pounds dry weight in 2023, and then increasing to *** pounds dry weight in 2024; it was *** pounds dry weight in January-September ("interim") 2025, up from *** pounds dry weight in interim 2024.[105]

2. Supply Conditions

The domestic industry was the largest supplier of the U.S. market in 2022 and 2023, but was supplanted by nonsubject imports in 2024 and interim 2025. Subject imports were the third-largest supplier of the market throughout the POI.[106]

The domestic industry consists of three firms: ADM, accounting for *** percent of U.S. production in 2024, Primient, accounting for *** percent, and Cargill, accounting for *** percent.[107]

Some domestic producers reported temporary supply constraints during the POI. ADM reported temporary supply disruptions due to weather events *** and ***. ADM reported that

[102] CR/PR at 2.7; Petitioners' Postconference Brief at 22; JBL's Postconference Brief at 5-6; Conference Tr. at 31 (Butler), 89 (Woodings).

[103] CR/PR at 2.8; Petitioners' Postconference Brief at Exh. 1, Response to Staff Questions, at 8-9; JBL's Postconference Brief at 5; Conference Tr. at 57 (Zeager, Butler), 87 (Woodings).

[104] CR/PR at Table 2.5.

[105] CR/PR at Tables 4.8, C.1. Apparent U.S. consumption declined between 2022 and 2024 notwithstanding the agreement of the parties and responding U.S. producers and importers that U.S. demand was generally "robust" and increasing throughout the POI. Conference Tr. at 31 (Butler), 83 (Rainville), 88 (Woodings). JBL contends that the trends in apparent U.S. consumption during the POI do not necessarily reflect substantial changes in U.S. demand. It asserts that the U.S. market saw a surge in U.S. imports of CACCS from Asian suppliers in 2022 as disruptions in ocean container traffic during the pandemic ended, that this led to a large inventory overhang by U.S. purchasers going into 2023, and that U.S. shipments of CACCS from domestic producers and JBL declined in 2023 as purchasers drew down these inventories. Conference Tr. at 88 (Woodings); JBL's Postconference Brief at 4-5. ADM reported ***. CR/PR at Table 3.3.

[106] CR/PR at Tables 4.8, C.1.

[107] CR/PR at Table 3.1.

it ***.[108] *** reported a voluntary recall due to an impurity in 2023, and equipment repair and replacement in 2024.[109] Primient reported no supply constraints.[110]

The domestic industry's practical capacity declined by 12.9 percent from 2022 to 2024, falling from 493.0 million pounds dry weight in 2022 to 471.4 million pounds dry weight in 2023 and 429.2 million pounds dry weight in 2024; practical capacity was 13.2 percent higher, at 351.6 million pounds dry weight, in interim 2025, compared with 310.5 million pounds dry weight in interim 2024.[111]

The parties agree that production of CACCS is capital intensive, and that maintaining a high capacity utilization rate is therefore important to a CACCS producer's financial performance.[112] The industry's practical capacity utilization declined irregularly by 6.5 percentage points from 2022 to 2024, falling from 91.4 percent in 2022 to 78.8 percent in 2023, and then increasing to 84.9 percent in 2024; practical capacity utilization was 1.3 percentage points lower, at 81.5 percent, in interim 2025, compared with 82.7 percent in interim 2024.[113]

The domestic industry's market share declined by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; its market share was *** percentage points lower in interim 2025, at *** percent, compared with *** percent in interim 2024.[114]

The market share of cumulated subject imports increased irregularly by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023, and then increasing to *** percent in 2024; their market share was *** percentage points lower in interim 2025, at *** percent, compared with *** percent in interim 2024.[115] Imports from Canada were previously subject to an antidumping duty order beginning in 2009, which was

[108] Conference Tr. at 55-56 (Butler); CR/PR at 2.6, Table 3.4.

[109] CR/PR at 2.6, Table 3.4.

[110] Conference Tr. at 56 (Zeager).

[111] CR/PR at Tables 3.5, C.1. Cargill reported that its practical capacity ***, while ADM reported *** practical capacity *** due to the weather-related supply disruptions it experienced. CR/PR at 3.5 and n.2; Conference Tr. at 55-56 (Butler).

[112] Conference Tr. at 28 (Kroese), 33-34 (Butler), 136-37 (Woodings); Petitioners' Postconference Brief at 23; CR/PR at 2.1.

[113] CR/PR at Tables 3.5, C.1. U.S. producers did not report producing any other products on the machinery used to produce CACCS. *Id.* at 3.8.

[114] CR/PR at Tables 4.11, C.1.

[115] CR/PR at Table C.1.

revoked in 2020 after domestic interested parties withdrew participation in the second five-year review of the order.[116]

The market share of nonsubject imports increased irregularly by *** percentage points from 2022 to 2024, rising from *** percent in 2022 to *** percent in 2023, and then falling to *** percent in 2024; their market share was *** percentage points higher in interim 2025, at *** percent, compared with *** percent in interim 2024.[117] The largest source of nonsubject imports was Thailand, which accounted for *** percent of nonsubject imports in 2024.[118]

3. Substitutability and Other Conditions

The record in the preliminary phase of these investigations indicates a high degree of substitutability between subject imports and the domestic like product.[119] Although there may be limited interchangeability between different forms of CACCS (citric acid, sodium citrate, potassium citrate, crude calcium citrate),[120] the record indicates that within each form of CACCS, subject imports and the domestic like product are interchangeable. All U.S. producers and majorities of responding U.S. importers reported that the domestic like product and subject imports were always interchangeable.[121] All U.S. producers reported that differences other than price between subject imports and the domestic like product were never significant in sales of CACCS.[122] A majority of responding U.S. importers reported that differences other than price between subject imports from Canada and the domestic like product were never significant.[123] However, a majority of responding U.S. importers reported that differences other than price between subject imports from India and the domestic like product were frequently or always significant.[124]

The record shows that price is an important factor in purchasing decisions for CACCS. Purchasers cited price/cost most frequently (reported by eight firms) as one of their top-three factors considered in purchasing decisions, followed by quality (six firms) and availability/supply

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[116] *Citric Acid and Certain Citrate Salts from Canada and the People's Republic of China: Antidumping Duty Orders*, 74 Fed. Reg. 25703 (May 29, 2009); *Citric Acid and Certain Citrate Salts from Canada: Final Results of Sunset Review and Revocation of Order*, 85 Fed. Reg. 37626 (June 23, 2020).

[117] CR/PR at Table C.1.

[118] CR/PR at 2.6.

[119] CR/PR at 2.9.

[120] CR/PR at 2.1.

[121] CR/PR at Table 2.7, 2.8.

[122] CR/PR at Table 2.9.

[123] CR/PR at Table 2.10.

[124] CR/PR at Table 2.10.

(five firms).[125] Quality was most frequently cited by purchasers as their first-most important factor (reported by four firms), followed by price/cost (three firms).[126]

Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations and contracts.[127] U.S. producers and importers reported selling most of their CACCS in 2024 under annual contracts.[128] Specifically, U.S. producers *** and importers *** reported that the vast majority of their sales were under annual contracts, U.S. producer *** reported the vast majority of its sales were under long-term contracts (more than one year), and importer *** reported the majority of its sales were under short-term contracts.[129] *** reported that its long-term contracts were indexed to raw material costs, but no other U.S. producer or importer reported that its contracts were indexed to raw material costs.[130] Contract negotiations between CACCS producers and purchasers generally take place in the third and fourth quarters of the year, with agreements generally covering deliveries for the following calendar year.[131]

The primary raw material for CACCS production is a starch ("substrate") that is fermented by yeast or mold to produce CACCS. Domestically produced CACCS products begin with a corn starch substrate,[132] which accounted for *** percent of U.S. producers' raw material costs in 2024.[133] Corn prices fluctuated during the POI but declined by 28.3 percent overall. The price of corn received by farmers increased by 32.3 percent from January 2022 to June 2022, when it reached its period peak of $7.38 per bushel, but then declined by 45.8 percent to $4.00 per bushel in September 2025.[134] Raw materials, as a share of U.S. producers' cost of goods sold ("COGS"), declined from 27.8 percent in 2022 to 26.6 percent in 2023 and 22.5 percent in 2024; they were higher, at 23.4 percent, in interim 2025, compared with 22.3

[125] CR/PR at Table 2.6.

[126] CR/PR at Table 2.9.

[127] CR/PR at Table 5.2.

[128] U.S. producers reported that *** percent of their U.S. commercial shipments in 2024 were through annual contracts, *** percent through long-term contracts, *** percent through spot sales, and *** percent through short-term contracts. CR/PR at Table 5.3. U.S. importers reported that *** percent of their U.S. commercial shipments in 2024 were through annual contracts, *** percent through long-term contracts, *** percent through spot sales, and *** percent through short-term contracts. *Id.*

[129] CR/PR at 5.4.

[130] CR/PR at 5.4; *** Revision to U.S. Producer's Questionnaire at IV-7 (EDIS Document No. ***).

[131] CR/PR at 2.7; Conference Tr. at 77 (Butler), 84 (Rainville).

[132] CR/PR at 5.1.

[133] CR/PR at Table 6.4.

[134] CR/PR at 5.1 and Table 5.1.

percent in interim 2024.[135] On a dollars per-pound dry weight basis, U.S. producers' raw material costs increased overall from $0.20 in 2022 to $0.23 in 2024; they were $0.23 in both interim periods.[136] Consistent with the parties' description of CACCS production as capital-intensive with high fixed costs, other factory costs accounted for the largest share of U.S. producers' COGS throughout the POI, ranging from 63.0 to 68.7 percent of COGS.[137]

CACCS are generally categorized as being either genetically modified organism ("GMO") or non-GMO, depending on the feedstock (or substrate) used in the production of the CACCS.[138] The parties agree that the market for non-GMO CACCS is limited in the United States.[139] However, for certain applications, U.S. users want CACCS certified as non-GMO. One such certification is "Non-GMO Project" certification, which requires that all inputs, not just the product itself, be GMO-free.[140] Both petitioners and JBL assert that their production processes ensure that the CACCS they produce contain no GMO material, and third-party labs have verified that CACCS produced by the petitioners are GMO-free.[141] However, since both the petitioners and JBL primarily use GMO corn as the base for their substrate, their CACCS do not meet the requirements for the Non-GMO Project certification.[142]

Imports of CACCS from China have been subject to antidumping and countervailing duty orders since 2009,[143] while imports of CACCS from Belgium, Colombia, and Thailand have been subject to antidumping duty orders since 2018.[144]

Effective March 4, 2025, CACCS originating in Canada were subject to ad valorem duties under the International Emergency Economic Powers Act ("IEEPA").[145] However, effective three days later, March 7, 2025, products originating in Canada that entered with duty free

[135] CR/PR at Table 6.1

[136] CR/PR at 6.12, Table 6.1.

[137] CR/PR at Table 6.1.

[138] CR/PR at 1.13.

[139] CR/PR at 1.13; Conference Tr. at 32-33 (Butler), 67-68 (Butler, Kroese, Zeager), 103-04 (Torres).

[140] CR/PR at 1.13; Conference Tr. at 32 (Butler), 112 (Torres).

[141] CR/PR at 1.13-1.14; Conference Tr. at 32-33, 45 (Butler), 67 (Butler, Kroese), 103, 111-12 (Torres).

[142] CR/PR at 1.14; Conference Tr. at 32, 45-46 (Butler), 102-03 (Torres).

[143] *Citric Acid and Certain Citrate Salts from Canada and the People's Republic of China: Antidumping Duty Orders*, 74 Fed. Reg. 25703 (May 29, 2009); *Citric Acid and Certain Citrate Salts from Canada and the People's Republic of China: Notice of Countervailing Duty Order*, 74 Fed. Reg. 25705 (May 29, 2009).

[144] *Citric Acid and Certain Citrate Salts from Belgium, Colombia and Thailand: Antidumping Duty Orders*, 83 Fed. Reg. 35214 (July 25, 2018).

[145] CR/PR at I.9.

treatment under the United States-Mexico-Canada Agreement, including CACCS, were not subject to the additional duty under IEEPA.[146] Beginning on April 5, 2025, CACCS originating in India were subject to varying levels of duties under IEEPA.[147] *** reported that U.S. purchasers increased their orders after the tariffs were announced in order to build inventory before the effective dates of the tariffs, resulting in a drastic increase in imports from Thailand and India in the first half of 2025.[148] As of February 20, 2026, tariffs imposed under IEEPA were no longer in effect.[149]

Effective February 24, 2026, CACCS originating in Canada and India are subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974.[150]

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."[151]

The volume of cumulated subject imports increased irregularly by *** percent from 2022 to 2024, falling by *** percent from *** pounds dry weight in 2022 to *** pounds dry weight in 2023, and then increasing by *** percent to *** pounds dry weight in 2024; cumulated subject imports were *** percent lower in interim 2025, at *** pounds dry weight, compared with *** pounds dry weight in interim 2024.[152]

The market share of cumulated subject imports increased irregularly by *** percentage points from 2022 to 2024. It fell from *** percent in 2022 to *** percent in 2023, and then increased by *** percentage points to *** percent in 2024; subject import market share was *** percentage points lower in interim 2025, at *** percent, compared with *** percent in interim 2024.[153] Cumulated subject imports' market share in interim 2025 remained higher than their market share in 2022 and 2023.

[146] CR/PR at 1.9; Conference Tr. at 115 (Waite).
[147] CR/PR at I.9 to I.10.
[148] CR/PR at 2.2.
[149] CR/PR at 1.9 to 1.10.
[150] CR/PR at 1.9.
[151] 19 U.S.C. § 1677(7)(C)(i).
[152] CR/PR at Tables 4.2, C.1.
[153] CR/PR at Tables 4.8, C.1.

We find that the volume of cumulated subject imports is significant in absolute terms and relative to consumption in the United States. We also find that the increase in that volume is significant in absolute terms and relative to U.S. consumption.[154]

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
>
> (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.[155]

As discussed in section VII.B.3 above, we find that there is a high degree of substitutability between subject imports and the domestic like product, and that price is an important factor in purchasing decisions for CACCS.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of four CACCS products shipped to unrelated U.S. customers during the POI.[156] Three U.S. producers and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing data for all products for all quarters.[157] The reported pricing data accounted for approximately 43.9 percent of U.S. producers' U.S. shipments of CACCS, *** percent of U.S. shipments of subject imports from Canada, and *** percent of U.S. shipments of subject imports from India in 2024.[158]

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[154] Commissioner Johanson finds that the increase in cumulated subject imports from 2023 to 2024 is significant in absolute terms and relative to U.S. consumption.

[155] 19 U.S.C. § 1677(7)(C)(ii).

[156] CR/PR at 5.5. The four pricing products are:

Product 1.-- Citric acid, fine granular, in dry form in 25 kilogram and 50 pound bags.

Product 2.-- Citric acid, granular, in dry form packed in bulk sacks ("supersacks") with a capacity of at least 1,000 pounds.

Product 3.-- Sodium citrate, granular, in dry form in 25 kilogram and 50 pound bags.

Product 4.-- Sodium citrate, granular, in dry form packed in bulk sacks ("supersacks") with a capacity of at least 1,000 pounds. *Id.*

[157] CR/PR at 5.5.

[158] CR/PR at 5.5.

Subject imports undersold the domestic like product in 73 of 101 quarterly comparisons (72.3 percent), with underselling margins ranging from *** percent to *** percent, and averaging *** percent.[159] By volume, there were *** pounds dry weight of subject imports in these 73 quarters, accounting for *** percent of reported subject import sales volume in the Commission's pricing data.[160] The record indicates that after 2022, the frequency of subject import underselling increased, with underselling in 9 of 27 quarterly comparisons in 2022, 22 of 25 quarterly comparisons in 2023, 22 of 28 quarterly comparisons in 2024, and 20 of 21 quarterly comparisons in interim 2025.[161] The share of reported subject import volume in the Commission's pricing data that was in quarters with underselling increased from *** percent in 2022 to *** percent in 2023, *** percent in 2024, and *** percent in interim 2025.[162]

We have also considered lost sales. Of eight responding purchasers, seven reported that they purchased subject imports during the POI instead of the domestic like product. Five of these seven reported that subject import prices were lower than those for the domestic like product, and two of these purchasers reported that price was a primary reason for the decision to purchase subject imports rather than the domestic like product.[163] These purchasers estimated that the quantity of subject imports they purchased instead of the domestic like product totaled *** pounds dry weight.[164]

JBL argues that the Commission's pricing data do not take into account long-term contracts of U.S. producers that allegedly insulated them from pricing declines in the market in 2023 and 2024, and thus inflated U.S. producers' prices in the pricing comparisons for the Commission's underselling analysis.[165] However, two of the three U.S. producers, ***, reported

[159] CR/PR at Table 5.9.

[160] CR/PR at Table 5.9. Subject imports oversold the domestic like product in 28 of 101 quarterly comparisons, with overselling margins ranging from *** percent to *** percent, and averaging *** percent. *Id.* There were *** pounds dry weight of subject imports in these 28 quarters, accounting for *** percent of reported subject import sales volume in the Commission's pricing data. *Id.*

[161] CR/PR at Table 5.11.

[162] Derived from CR/PR at Table 5.11. By volume, *** pounds dry weight of subject imports were in the underselling quarters in 2022; *** pounds dry weight of subject imports were in the underselling quarters in 2023; *** pounds dry weight of subject imports were in the underselling quarters in 2024; and *** pounds dry weight of subject imports were in the underselling quarters in interim 2025. *Id.*

[163] CR/PR at 5.19, Table 5.14.

[164] CR/PR at Tables 5.14, 5.15. This quantity is equivalent to *** percent of the quantity of purchases of subject imports reported by responding purchasers, *** percent of the domestic industry's U.S. shipments during the POI, and *** percent of total apparent U.S consumption over the POI. Derived from CR/PR at 5.17, Tables 4.8, 5.12, 5.14.

[165] JBL's Postconference Brief at 20-22.

that the vast majority of their sales were under annual contracts and not long-term contracts,[166] and the one U.S. producer *** that reported that the vast majority of its sales were under long-term contracts also reported that ***, indicating that it ***.[167] Moreover, regardless of how U.S. producers' prices were set, the record shows that they were pervasively undersold by subject imports.[168] We will investigate further in any final phase of these investigations how prices are set in the U.S. market and the effects of long-term and annual contracts.

Based on the foregoing, we find that cumulated subject imports significantly undersold the domestic like product. The underselling contributed to cumulated subject imports gaining market share at the expense of the domestic industry, which lost *** percentage points of market share to cumulated subject imports between 2023 and 2024 and *** percentage points to subject imports overall between 2022 and 2024.[169]

Prices for the domestic like product and subject imports decreased overall from January 2022 to September 2025. U.S. producers' overall price decreases ranged from *** to *** percent during January 2022 to September 2025 while subject import price decreases ranged from *** to *** percent.[170] U.S. producers' prices for each product generally increased from 2022 to 2023, and then declined *** in 2024, as subject imports pervasively undersold and took market share from the domestic like product.[171] U.S. producers' prices in the first three quarters of 2025 were mostly lower than their prices in the corresponding quarters in 2024.[172]

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[166] CR/PR at 5.4.

[167] CR/PR at 5.4; *** Revision to U.S. Producer's Questionnaire at IV-7 (EDIS Document No. ***). The record also does not establish when U.S. producers entered into these long-term contracts, whether in 2024 or in previous years.

[168] CR/PR at Table 5.9.

[169] CR/PR at 4.8, C.1.

[170] CR/PR at 5.14, Table 5.8. Specifically, U.S. producers' prices declined by *** percent over the POI for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4. *Id.* at Table 5.8. The price of subject imports from Canada declined by *** percent over the POI for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4. *Id.* The price of subject imports from India declined by *** percent over the POI for product 1 and by *** percent for product 3; there were no pricing data for subject imports from India for product 2 during the POI, and *** for subject imports from India for product 4. *Id.*

[171] CR/PR at Tables 5.4 to 5.7. U.S. producers' prices (in dollars per pound dry weight) declined from $*** in the fourth quarter of 2023 to *** in the first quarter of 2024 for product 1; declined from $*** in the fourth quarter of 2023 to $*** in the first quarter of 2024 for product 3; and declined from $*** in the fourth quarter of 2023 to $*** in the first quarter of 2024 for product 4. *Id.* at Tables 5.4, 5.6, 5.7. U.S. producers' prices for product 2 began to decline in the third quarter of 2023 (from $*** to $***), and continued to decline in 2024 (to $*** in the fourth quarter). *Id*. at Table 5.5.

[172] *See* CR/PR at Tables 5.4-5.7.

Three purchasers reported that U.S. producers reduced prices in order to compete with lower-priced subject imports; the reported estimated price reductions by domestic producers ranged from *** to *** percent.[173] One purchaser reported that U.S. producers had not lowered their prices to compete with subject imports and four purchasers said they did not know if this had occurred.[174]

As subject import underselling led to a decline in the domestic industry's prices, the average unit value ("AUV") of its sales accordingly fell by $0.17 per pound dry weight, or 14.1 percent, between 2022 and 2024, while its unit costs increased by $0.31 per pound dry weight, or 43.1 percent.[175] As a result of the domestic industry's falling net sales AUVs and rising per-unit costs, its COGS-to-net-sales ratio increased by 40.1 percentage points between 2022 and 2024, from 60.2 percent in 2022 to 74.9 percent in 2023 and 100.2 percent in 2024; it was higher at 102.5 percent in interim 2025, compared with 99.7 percent in interim 2024.[176]

We note that the domestic industry's other factory costs increased as a ratio to net sales from 37.9 percent in 2022 to 68.9 percent in 2024. The increases in the industry's ratios of other factory costs to net sales and of COGS to net sales were largely driven by the results of one firm, ***. In any final phase of these investigations, we intend to examine further the financial results of this firm. However, the domestic industry's total net sales unit value declined by more than its per-unit variable costs (raw materials plus direct labor) from 2023 to 2024 and between interim periods, indicating that the industry's increasing COGS-to-net-sales ratio was not merely a result of increasing other factory costs.[177]

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[173] CR/PR at 5.20, Table 5.17.

[174] CR/PR at 5.20.

[175] CR/PR at Tables 6.1, 6.2. Specifically, the industry's net sales AUV (per pound dry weight) declined irregularly by 14.1 percent from 2022 to 2024, increasing by 5.4 percent from $1.19 in 2022 to $1.26 in 2023 and then falling sharply by 18.5 percent to $1.02 in 2024; it was 5.8 percent lower in interim 2025, at $0.95, compared with $1.01 in interim 2024. CR/PR at Table 6.1. By contrast, its unit costs (per pound dry weight) increased by 31.3 percent from $0.72 in 2022 to $0.94 in 2023 and by 9.0 percent to $1.03 in 2024; they were slightly lower by 3.2 percent in interim 2025, at $0.98, compared with $1.01 in interim 2024. *Id.*

[176] CR/PR at Tables 6.1, C.1.

[177] From 2022 to 2024, the industry's per-unit variable costs increased by $0.05 per pound dry weight (21.1 percent), while its net sales unit value declined by $0.17 per pound dry weight (14.1 Percent). Derived from CR/PR at Tables 6.1, 6.2. From 2023 to 2024 when domestic prices declined dramatically, the industry's per-unit variable costs declined by $0.01 per pound dry weight (2.0 percent) while its net sales unit value declined by $0.23 per pound dry weight (18.5 percent). *Id*. Between interim periods, the industry's per-unit variable costs were unchanged while its net sales unit value was $0.06 per pound dry weight lower (5.8 percent). *Id*.

We find that falling corn prices do not explain the extent of the domestic industry's falling prices in 2024 and interim 2025, as JBL contends.[178] Notwithstanding any decline in corn prices, U.S. producers' raw material costs actually increased over the POI on a dollars per-pound dry weight basis from $0.20 in 2022 to $0.23 in 2024; they were $0.23 in both interim periods.[179] By contrast, as noted above, U.S. producers' net sales AUVs declined.[180]

Similarly, the decline in U.S. producers' prices in 2024 and interim 2025 cannot be attributed to adverse trends in U.S. demand, since apparent U.S. consumption increased by *** percent from 2023 to 2024, and was *** percent higher in interim 2025 than in interim 2024.[181] We also note that most responding U.S. producers and importers reported that U.S. demand increased or fluctuated upward during the POI.[182]

Based on the above, we find that cumulated subject imports depressed U.S. producers' prices to a significant degree.

In sum, based on the record in the preliminary phase of these investigations, we find that cumulated subject imports significantly undersold the domestic like product, causing subject imports to gain market share at the expense of the domestic industry, and depressing prices of the domestic like product to a significant degree. Thus, we find that cumulated subject imports had significant price effects.

E. Impact of the Subject Imports[183]

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,

[178] JBL's Postconference Brief at 16-18; Conference Tr. at 90-91 (Woodings).

[179] CR/PR at 6.12, Table 6.1. From 2023 to 2024, the domestic industry's net sales AUV declined by more ($0.23 per pound dry weight) than the decline in its per-unit raw material costs ($0.02 per pound dry weight). Between interim periods, the industry's per-unit raw material costs were unchanged yet its net sales unit value declined by $0.06 per pound dry weight. *Id*. at Table 6.2.

[180] CR/PR at Table 6.1.

[181] CR/PR at Table C.1. While JBL argues that the U.S. market was oversupplied from late 2022 into 2023, causing reduced demand and declining prices, this does not explain the declines in the domestic industry's prices in 2024 and interim 2025. JBL's Postconference Brief at 16.

[182] CR/PR at Table 2.5.

[183] Commerce initiated antidumping duty investigations based on estimated dumping margins of 64.61 to 84.41 percent for imports from Canada, and 100.21 to 151.73 percent for imports from India. *Citric Acid and Certain Citrate Salts from Canada and India: Initiation of Less-Than-Fair Value Investigations*, 91 Fed. Reg. 7252, 7255 (Feb. 17, 2026).

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."[184]

The domestic industry's production, capacity, capacity utilization, U.S. shipments, productivity, and market share all declined between 2022 and 2024, while its inventories increased. The industry's revenues and all of its profitability indicators declined, leading to operating and net losses in 2024 and interim 2025.

The domestic industry's practical capacity declined by 12.9 percent from 2022 to 2024, falling from 493.0 million pounds dry weight in 2022 to 471.4 million pounds dry weight in 2023 and 429.2 million pounds dry weight in 2024; practical capacity was 13.2 percent higher, at 351.6 million pounds dry weight, in interim 2025, compared with 310.5 million pounds dry weight in interim 2024.[185] The industry's production quantity declined by 19.1 percent from 2022 to 2024, falling from 450.4 million pounds dry weight in 2022 to 371.7 million pounds dry weight in 2023 and 364.4 million pounds dry weight in 2024; production was 11.5 percent higher, at 286.5 million pounds dry weight, in interim 2025, compared with 257.0 million pounds dry weight in interim 2024.[186] The domestic industry's capacity utilization declined by 6.5 percentage points from 2022 to 2024, falling from 91.4 percent in 2022 to 78.8 percent in 2023, and then increasing to 84.9 percent in 2024; capacity utilization was 1.3 percentage points lower, at 81.5 percent, in interim 2025, compared with 82.7 percent in interim 2024.[187]

The domestic industry's U.S. shipments fell by 25.5 percent from 2022 to 2024, declining from 439.8 million pounds dry weight in 2022 to 361.5 million pounds dry weight in 2023 and 327.8 million pounds dry weight in 2024; U.S. shipments were 4.3 percent higher in interim 2025, at 263.7 million pounds dry weight, compared with 252.8 million pounds dry weight in interim 2024.[188] The domestic industry's market share declined by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; its market share was *** percentage points lower in interim 2025, at *** percent, compared with *** percent in interim 2024.[189]

[184] 19 U.S.C. § 1677(7)(C)(iii).
[185] CR/PR at Tables 3.5, C.1.
[186] CR/PR at Tables 3.5, C.1.
[187] CR/PR at Tables 3.5, C.1.
[188] CR/PR at Tables 3.9, C.1.
[189] CR/PR at Tables 4.8, C.1.

The domestic industry's end-of-period inventories almost doubled between 2022 and 2024, rising by 92.6 percent, increasing from 39.6 million pounds dry weight in 2022 to 44.6 million pounds dry weight in 2023 and 76.2 million pounds dry weight in 2024; end of period inventories were 114.5 percent higher, at 95.6 million pounds dry weight, in interim 2025, compared with 44.6 million pounds dry weight in interim 2024.[190] End-of-period inventories increased as a ratio to the domestic industry's total shipments from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; this ratio was up to *** percent in interim 2025 from *** percent in interim 2024.[191]

Most of the domestic industry's employment indicators increased from 2022 to 2024, but productivity declined. The number of production and related workers ("PRWs") increased by 4.1 percent from 2022 to 2024, from 340 PRWs in 2022 to 354 PRWs in 2023 and 2024; the number of PRWs was 2.5 percent higher, at 363 PRWs, in interim 2025, compared with 354 PRWs in interim 2024.[192] Hours worked increased by 8.2 percent from 2022 to 2024, from 575,000 hours in 2022 to 610,000 hours in 2023, and 622,000 hours in 2024; hours worked were 2.5 percent lower, at 473,000 hours, in interim 2025, compared with 485,000 hours in interim 2024.[193] Wages paid increased by 16.5 percent from 2022 to 2024, from $28.1 million in 2022 to $30.8 million in 2023 and $32.7 million in 2024; wages paid were 0.6 percent lower, at $25.6 million, in interim 2025, compared with $25.7 million in interim 2024.[194] Productivity declined by 25.2 percent from 2022 to 2024, from 783.3 pounds dry weight per hour in 2022 to 609.3 pounds dry weight per hour in 2023 and 585.9 pounds dry weight per hour in 2024; productivity was 14.3 percent higher, at 605.7 pounds dry weight per hour, in interim 2025, compared with 529.8 pounds dry weight per hour in interim 2024.[195]

The domestic industry's net sales value fell by 36.0 percent from 2022 to 2024, declining from $532.3 million in 2022 to $460.5 million in 2023 and $340.6 million in 2024; net sales value was 2.1 percent lower in interim 2025, at $254.8 million, compared with $260.4 million in interim 2024.[196] The domestic industry's gross profit declined from $212.1 million (39.8 percent as a ratio to net sales) in 2022 to $115.4 million in 2023 (25.1 percent as a ratio to net sales) and a net loss of $757,000 (negative 0.2 percent as a ratio to net sales) in 2024; the

[190] CR/PR at Tables 3.11, C.1.
[191] CR/PR at Tables 3.11, C.1.
[192] CR/PR at Tables 3.14, C.1.
[193] CR/PR at Tables 3.14, C.1.
[194] CR/PR at Tables 3.14, C.1.
[195] CR/PR at Tables 3.14, C.1.
[196] CR/PR at Tables 6.1, C.1.

industry's gross profit was worse in interim 2025, at a loss of $6.3 million (negative 2.5 percent as a ratio to net sales), compared with gross profit of $903,000 (0.3 percent as a ratio to net sales) in interim 2024.[197] The domestic industry's operating income declined from $*** in 2022 to $*** in 2023 and $*** in 2024; operating income was lower in interim 2025, at $***, compared with $*** in interim 2024.[198] The domestic industry's ratio of operating income to net sales declined from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; operating income to net sales was lower in interim 2025, at *** percent, compared with *** in interim 2024.[199] The domestic industry's net income declined from $*** in 2022 to $*** in 2023, and $*** in 2024; net income was lower in interim 2025, at ***, compared with a *** in interim 2024.[200] The domestic industry's ratio of net income to net sales declined from *** percent in 2022 to *** percent in 2023 and *** percent in 2024; net income to net sales was lower in interim 2025, at *** percent, compared with *** percent in interim 2024.[201] The domestic industry's net assets increased by 19.6 percent from 2022 to 2024, rising from $324.8 million in 2022 to $345.7 million in 2023 and $388.5 million in 2024.[202] The domestic industry's return on assets declined from *** percent in 2022 to *** percent in 2023, and *** percent in 2024.[203]

The domestic industry's capital expenditures increased by *** percent from 2022 to 2024, rising from $*** in 2022 to $*** in 2023 and $*** in 2024; capital expenditures were *** percent lower in interim 2025, at $*** compared with $*** in interim 2024.[204] The domestic industry's research and development expenses increased by *** percent from 2022 to 2024, rising from $*** in 2022 to $*** in 2023, and then falling to $*** in 2024; they were *** percent higher in interim 2025, at $***, compared with $*** in interim 2024.[205]

We find a causal nexus between cumulated subject imports and the domestic industry's declining trade and financial performance during the POI. Significant and increasing volumes of cumulated subject imports significantly undersold the domestic like product, taking sales and

[197] CR/PR at Tables 6.1, C.1.
[198] CR/PR at Tables 6.1, C.1.
[199] CR/PR at Tables 6.1, C.1.
[200] CR/PR at Tables 6.1, C.1.
[201] CR/PR at Tables 6.1, C.1.
[202] CR/PR at Tables 6.10, C.1.
[203] CR/PR at Table 6.11. As noted above in Section VII.D., *** other factory costs increased substantially over the POI, and in any final phase of these investigations, we intend to further examine the financial results of this firm.
[204] CR/PR at Tables 6.6, C.1.
[205] CR/PR at Tables 6.8, C.1.

market share from the domestic industry and depressing U.S. producers' prices, resulting in declines in the industry's output and revenues and increases in its inventories, leading to significant declines in the industry's financial indicators, which became losses in 2024 and interim 2025.

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. JBL argues that increasing volumes of nonsubject imports from Thailand and other sources were the principal cause of any loss of market share by the domestic industry.[206] U.S. imports of CACCS from Thailand have been subject to an antidumping duty order since 2018.[207] We recognize that the volume and market share of nonsubject imports, both from Thailand and as a whole, increased during the POI.[208] However, notwithstanding the increase in nonsubject imports during the POI, cumulated subject imports gained *** percentage points of market share at the expense of the domestic industry from 2022 to 2024.[209] From 2023 to 2024, nonsubject imports' market share declined by *** percentage points as cumulated subject imports' market share increased by *** percentage points, largely at the expense of the domestic industry.[210] Moreover, nonsubject imports from Thailand and other sources do not explain the significant underselling by subject imports. Purchasers confirm that U.S. producers lost sales and reduced prices due to competition from subject imports.[211] Thus, cumulated subject imports from Canada and India had a significant impact on the domestic industry that was distinct from any impact of imports from nonsubject sources.[212] We intend to examine further in any final phase of these investigations the role of nonsubject imports from Thailand and other sources in the U.S. market, including seeking appropriate pricing data.

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[206] Conference Tr. at 85 (Rainvlle), 98 (Waite); JBL's Postconference Brief at 2, 23.

[207] *Citric Acid and Certain Citrate Salts from Belgium, Colombia and Thailand: Antidumping Duty Orders*, 83 Fed. Reg. 35214 (July 25, 2018).

[208] CR/PR at Table C.1. The volume of cumulated subject imports was substantially greater than that of nonsubject imports from Thailand throughout the POI. CR/PR at Table C.1.

[209] CR/PR at Table C.1.

[210] CR/PR at Table C.1.

[211] CR/PR at 5.19-5.20.

[212] The material injury standard does not require that subject imports be the "principal" cause of injury to the domestic industry or contemplate that injury from subject imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry. S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47. The Commission need only find that the subject imports have been more than an "incidental, tangential, or trivial" cause of injury to the domestic industry. *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1381 (Fed. Cir. 2003).

JBL also argues that the domestic industry's performance during the POI was adversely affected by supply disruptions at ADM ***, which required *** to purchase CACCS from JBL to make up for its lost production.[213] However, the record indicates that these disruptions appear to be temporary, and the firms took steps to minimize any supply interruptions.[214] Moreover, the record indicates that, notwithstanding temporary disruptions for individual producers, the domestic industry as a whole had available capacity to provide additional supply to the market, as did *** individually.[215] Furthermore, the industry's temporary supply problems do not explain the underselling by subject imports or resulting price depression we have attributed to subject imports. ***'s purchases of subject imports also do not explain the extent of the increase in subject imports during the POI. *** purchased *** pounds dry weight of subject imports from Canada in 2023 and *** pounds dry weight of subject imports from Canada in 2024.[216] These volumes are equivalent to *** percent of apparent U.S. consumption in 2023 and *** percent in 2024, while cumulated subject imports increased their market share overall by *** percentage points from 2022 to 2024 and by *** percentage points from 2023 to 2024.[217]

We also find that demand trends do not explain the domestic industry's injury during the POI. The parties generally agree that U.S. demand for CACCS was robust during the POI.[218] Although apparent U.S. consumption declined by *** percent from 2022 to 2024,[219] that figure is the sum of U.S. producers' and importers' U.S. shipments, and may not fully reflect total demand, especially if purchasers were destocking inventories. In any event, demand trends do not explain the underselling by subject imports, the shift in market share from the domestic

[213] JBL's Postconference Brief at 23-24.

[214] As noted, ADM reported temporary supply disruptions in *** due to weather events, ***, and that it ***. CR/PR at 2.6, Table 3.4. *** reported a voluntary recall due to an impurity in 2023, and equipment repair and replacement in 2024. *Id.* *** reported that it *** to prevent disruptions to its customers. *Id*. at Table 3.4. Primient reported no supply constraints. Conference Tr. at 56 (Zeager).

[215] *See* CR/PR at Tables 3,4, 3.5, 3.7. The domestic industry's reported capacity reflects downward adjustments made by individual firms to take account of these temporary supply disruptions. CR/PR at 3.5 n.2. The domestic industry reported unused practical capacity of 42.6 million pounds dry weight in 2022, 99.7 million pounds dry weight in 2023, 64.8 million pounds dry weight in 2024, and 65.1 million pounds dry weight in interim 2025. Derived from *id.* at Table 3.7. For comparison, the volume of cumulated subject imports increased by *** pounds dry weight from 2022 to 2024. *Id*. at Table C.1.

[216] CR/PR at Table 3.12.

[217] CR/PR at Table C.1.

[218] Conference Tr. at 31 (Butler), 83 (Rainville), 88 (Woodings).

[219] Derived from CR/PR at Tables 4.8, C.1.

industry to cumulated subject imports, and the *** decline in U.S. producers' prices that occurred in 2024 and interim 2025 while apparent U.S. consumption was increasing.[220]

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

VIII. 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 CACCS from Canada and India that are allegedly sold in the United States at less than fair value and subsidized by the governments of Canada and India.

[220] CR/PR at Tables 5.4 to 5.8, C.1.

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 Archer-Daniels-Midland Company ("ADM"), Decatur, Illinois; Cargill, Incorporated ("Cargill"), Wayzata, Minnesota; and Primary Products Ingredients Americas LLC ("Primient"), Schaumburg, Illinois on January 21, 2026, 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 citric acid and certain citrate salts ("CACCS")[1] from Canada and India. Table 1.1 presents information relating to the background of these investigations.[2] [3]

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

Effective date	Action
January 21, 2026	Petitions filed with Commerce and the Commission; institution of Commission investigations (91 FR 3221, January 26, 2026)
February 11, 2026	Commission's conference
February 17, 2026	Commerce's notice of initiation (91 FR 7252 and 7257, February 17, 2026)
March 6, 2026	Commission's vote
March 9, 2026	Commission's determinations
March 16, 2026	Commission's views

Statutory criteria

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

> shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . .

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

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

[3] A list of witnesses who appeared at the conference is presented in appendix B of this report.

may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

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

> In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant.. . .In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . .(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

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

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

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

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

CACCS are used in the production of a variety of foods, beverages, pharmaceuticals, dietary supplements, personal care products (such as baby care wipes and cosmetics), and commercial and household products (such as detergents and cleaners), as well as in industrial applications (such as metal finishing and cleaning, textile finishing treatments, plasticizer production, water treatment, and renewable fuels).[6] The leading U.S. producers of CACCS are ADM, Cargill, and Primient, while leading producers of CACCS outside the United States include Jungbunzlauer Canada Inc. ("JBL") of Canada and Daffodil Pharmachem Private Limited (Doing Business As) Daffocitra ("Daffodil") of India. The leading U.S. importer of CACCS from Canada is JBL, while the leading importer of CACCS from India is Daffodil. Leading importers of product from nonsubject countries (primarily Thailand, Israel, and Colombia) include Gadot America Inc. ("Gadot") and Prinova USA ("Prinova"). Leading U.S. purchasers of CACCS are firms that use CACCS in food, beverage, and household product manufacturing, including ***.

Apparent U.S. consumption of CACCS totaled approximately *** dry pounds ($***) in 2024. Currently, three firms are known to produce CACCS in the United States. U.S. producers' U.S. shipments of CACCS totaled 327.8 million dry pounds ($335.4 million) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** dry pounds ($***) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled 346.1 million dry pounds ($350.8 million) 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 September of 2024 ("interim 2024") and January through September of 2025 ("interim 2025"). Except as noted, U.S. industry data are based on questionnaire responses of three firms that accounted for all known U.S. production of CACCS during 2024.

[6] Petitions, pp. 11 and 33; conference transcript, pp. 6 (Vanderloo), 8 (Vaughn), 23 (Kroese), and 56 (Zeager).

U.S. imports are based on official import statistics, except for Canada, which are based on proprietary, Census-edited Customs records.

Previous and related investigations

CACCS has been the subject of a number of prior countervailing and antidumping duty investigations in the United States (table 1.2).

Table 1.2 CACCS: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original final determination	Current status
1999	731-TA-863	China	Negative	NA
2008	701-TA-456	China	Affirmative	Ongoing third five-year review
2008	731-TA-1151	Canada	Affirmative	Order revoked after domestic interested parties withdrew participation in second five-year review, 2020
2008	731-TA-1152	China	Affirmative	Ongoing third five-year review
2017	731-TA-1374	Belgium	Affirmative	Order continued after full first five-year review, 2024
2017	731-TA-1375	Colombia	Affirmative	Order continued after full first five-year review, 2024
2017	731-TA-1376	Thailand	Affirmative	Order continued after full first five-year review, 2024

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: “Date” refers to the year in which the investigation was instituted by the Commission.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On February 17, 2026, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigation on CACCS from Canada and India.[7]

Alleged sales at LTFV

On February 17, 2026, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on CACCS from Canada and India.[8] Commerce has initiated antidumping duty investigations based on estimated dumping margins of 64.61 to 84.41 percent for CACCS from Canada and 100.21 to 151.73 percent for CACCS from India.

[7] For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 91 FR 7257, February 17, 2026.

[8] 91 FR 7252, February 17, 2026.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[9]

> The merchandise covered by these investigations includes all grades and granulation sizes of citric acid, sodium citrate, and potassium citrate in their unblended forms, whether dry or in solution, and regardless of packaging type. The scope also includes blends of citric acid, sodium citrate, and potassium citrate, as well as blends with other ingredients, such as sugar, where the unblended form(s) of citric acid, sodium citrate, and potassium citrate constitute 40 percent or more, by weight, of the blend.
>
> The scope also includes all forms of crude calcium citrate, including dicalcium citrate monohydrate, and tricalcium citrate tetrahydrate, which are intermediate products in the production of citric acid, sodium citrate, and potassium citrate. The scope includes the hydrous and anhydrous forms of citric acid, the dihydrate and anhydrous forms of sodium citrate, otherwise known as citric acid sodium salt, and the monohydrate and monopotassium forms of potassium citrate. Sodium citrate also includes both trisodium citrate and monosodium citrate which are also known as citric acid trisodium salt and citric acid monosodium salt, respectively.
>
> The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing or removing additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the subject country. The scope also includes merchandise matching the above description that is commingled or blended with citric acid, sodium citrate, and potassium citrate from sources not subject to these investigations. Only the subject component of such commingled products is covered by the scope of these investigations.
>
> The scope does not include calcium citrate that satisfies the standards set forth in the United States Pharmacopeia and has been mixed with a functional excipient, such as dextrose or starch, where the excipient constitutes at least two percent, by weight, of the product.

[9] 91 FR 7252 and 7257, February 17, 2026.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations are imported under several Harmonized Tariff Schedule of the United States ("HTS") statistical reporting numbers depending on the chemical composition. Citric acid and sodium citrate are imported under statistical reporting numbers 2918.14.0000 and 2918.15.1000 of the HTS, respectively. The general rate of duty is 6.0 percent ad valorem for HTS subheading 2918.14.00 and 6.5 percent ad valorem for HTS subheading 2918.15.10.[10] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

See table 1.4 for a summary of additional tariffs in place as of March 2, 2026. In addition, below is a summary of additional tariffs applied to CACCS.

Table 1.4 CACCS: Additional tariffs on imports originating in Canada and India as of March 2, 2026

Duty rates in percent ad valorem

Additional tariff	Canada	India
Section 122	10	10
Total additional ad valorem rate	10	10

Source: Federal Register notices and other sources cited in this section (Tariff treatment).

Note: Duty rates in the table reflect the duty rates as of the preparation of this report. See the text above for historical changes to the additional tariffs.

Section 122 tariffs[11]

Effective February 24, 2026, CACCS originating in India are subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974.

Effective February 24, 2026, CACCS originating in Canada are subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974. Products originating in

[10] The subject merchandise in this proceeding may also be imported under additional statistical reporting numbers. Potassium citrate and crude calcium citrate ("CCC") are imported under statistical reporting number 2918.15.5000. Blends that include citric acid, sodium citrate, and potassium citrate are imported under statistical reporting number 3824.99.9397. The general rate of duty is 3.7 percent ad valorem for HTS subheading 2918.15.50 and 5.0 percent ad valorem for HTS subheading 3824.99.93. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 29.59, 38.26.

[11] Section 122 authorizes the President to impose a temporary import surcharge for a period not exceeding 150 days unless such period is extended by an Act of the Congress. The White House, Imposing a Temporary Import Surcharge to Address Fundamental International Payments Problems, February 20, 2026, https://www.whitehouse.gov/presidential-actions/2026/02/imposing-a-temporary-import-surcharge-to-address-fundamental-international-payments-problems/.

Canada that enter with duty free treatment under the United States-Mexico-Canada Agreement ("USMCA") are not subject to the additional ad valorem duty under section 122.

Tariffs initiated under the International Emergency Economic Powers Act ("IEEPA")[12]

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to CACCS originating in Canada and India that were in effect until February 20, 2026.[13]

Country specific IEEPA tariffs

Effective March 4, 2025, CACCS originating in Canada were subject to an additional 25 percent ad valorem duty under IEEPA. Effective August 1, 2025, the duty rate increased to 35 percent. Effective March 7, 2025, products originating in Canada that entered with duty free treatment under the United States-Mexico-Canada Agreement ("USMCA") were not subject to the additional ad valorem duty under IEEPA.[14] Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.[15]

Effective August 27, 2025, CACCS originating in India were subject to an additional 25 percent ad valorem duty under IEEPA. Effective February 7, 2026, the additional tariff specific to India was terminated.[16]

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[12] Multiple tariffs were enacted under the authority of the International Emergency Economic Powers Act ("IEEPA"), including tariffs that applied to countries that may not be subject in this proceeding. 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 and terminated effective February 7, 2026. Tariffs under IEEPA were amended over time. All tariffs initiated under IEEPA were terminated effective February 20, 2026. The White House, Ending Certain Tariff Actions, February 20, 2026, https://www.whitehouse.gov/presidential-actions/2026/02/ending-certain-tariff-actions/.

[13] The White House, Ending Certain Tariff Actions, February 20, 2026, https://www.whitehouse.gov/presidential-actions/2026/02/ending-certain-tariff-actions/.

[14] 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 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.2 to 99.3.3, 99.3.373, and 99.3.374.

[15] The White House, Ending Certain Tariff Actions, February 20, 2026, https://www.whitehouse.gov/presidential-actions/2026/02/ending-certain-tariff-actions/.

[16] 90 FR 38701, August 11, 2025; 91 FR 6501, February 11, 2026. See also HTS headings 9903.01.84, 9903.01.85, 9903.01.86, 9903.01.87, 9903.01.88, and 9903.01.89 and U.S. note 2(z) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.48 to 99.3.49, 99.3.387 to 99.3.388.

Tariffs initiated in April 2025 under IEEPA

CACCS originating in Canada were not subject to tariffs initiated in April 2025 under IEEPA.[17]

Effective April 5, 2025, CACCS originating in India were subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA. Effective April 9, 2025, India was instead assigned an individualized country duty of 26 percent ad valorem. However, effective April 10, 2025, the individualized country duties were suspended and the additional duty rate as part of tariffs initiated in April 2025 under IEEPA for CACCS originating in India was returned to 10 percent.[18] Effective August 7, 2025, India was assigned an individualized country duty of 25 percent.[19] Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.[20]

[17] 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)(iv) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.12, 99.3.375.

[18] Individualized country duties as part of tariffs initiated in April 2025 under IEEPA for all countries other than China were suspended April 10, 2025, until August 7, 2025. 90 FR 15041, April 7, 2025; 90 FR 15625, April 15, 2025; 90 FR 30823, July 10, 2025; 90 FR 37963, August 6, 2025. See also HTS headings 9903.01.25 and 9903.01.55 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41, 99.3.375, 99.3.380.

[19] 90 FR 37963, August 6, 2025. See also HTS heading 9903.02.26 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41, 99.3.395.

[20] The White House, Ending Certain Tariff Actions, February 20, 2026, https://www.whitehouse.gov/presidential-actions/2026/02/ending-certain-tariff-actions/.

The product

Description and applications

The imported products subject to these investigations are citric acid and certain citrate salts ("CACCS"), specifically sodium citrate and potassium citrate; blends containing citric acid, sodium citrate and potassium citrate; and crude calcium citrate ("CCC").[21] Citric acid, sodium citrate, and potassium citrate are all available either in dry form or in solution. CACCS have only minor molecular differences that do not significantly alter their essential characteristics or uses.[22]

Citric acid, sodium citrate, and potassium citrate are chemical products used in the production and formulation of a wide variety of foods, beverages, pharmaceuticals, and cosmetics as well as commercial and household products including detergents and cleaners. CACCS can also be used in industrial applications, including metal finishing and cleaning, textile finishing treatments, production of plasticizers and other industrial applications.[23]

Citric acid, sodium citrate, and potassium citrate are sold as odorless, translucent crystals. These crystals are normally sold in three granulations: granular, fine granular, and powder.[24]

The formal chemical names and formulas for the typical commercial forms of the products are:

- Citric acid: Citric acid anhydrous ($C_6H_8O_7$) and citric acid monohydrate ($C_6H_8O_7 \bullet H_2O$);
- Sodium citrate: Sodium citrate anhydrous or trisodium citrate anhydrous ($Na_3C_6H_5O_7$), sodium citrate dihydrate or trisodium citrate dihydrate ($Na_3C_6H_5O_7 \bullet 2H_2O$), and monosodium citrate ($NaH_2(C_3H_5O(COO)_3$);
- Potassium citrate: Potassium citrate monohydrate or tripotassium citrate monohydrate ($K_3C_6H_5O_7 \bullet H_2O$), and monopotassium citrate ($KH_2C_6H_5O_7$); and
- Calcium citrate: Tricalcium citrate ($Ca_3(C_6H_5O_7)_2$), dicalcium citrate ($Ca_2(C_3H_4O)(COO)_3 \bullet H_2O$), and tricalcium citrate tetrahydrate ($Ca_3(C_6H_5O_7)_2 \bullet 4H_2O$).[25]

[21] CCC, or calcium citrate slurry, is an intermediate form in the production of citric acid via the lime/sulfuric acid process. Petitions, p. 16.

[22] Petitions, p. 10.

[23] Petitions, p. 11.

[24] Petitions, p. 11.

[25] Petitions, p. 11.

The monohydrate and anhydrous forms of citric acid are completely interchangeable, as are the dihydrate and anhydrous forms of sodium citrate. The dry versions of these products are soluble in water. A water solution form of citric acid (normally a 50 percent citric acid solution) is also sold in the United States.[26] Domestic purchasers sometimes buy the dry form and put it into solution at their own facilities or at the facilities of an independent converter. The solution form can be reversed to a dry form.[27]

Citric caid and citrate salts are ***.[28] The Food and Drug Administration ("FDA") classifies citric acid, sodium citrate, and potassium citrate as ***.[29] Citric acid, sodium citrate, potassium citrate produced in the United States for use in beverage and food products are subject to purity and other standards established in the Food Chemical Codex ("FCC"). They are also subject to the standards of the U.S. Pharmacopeia ("USP"). Imported CACCS intended for food or pharmaceutical use in the United States must satisfy the same FCC or USP standards.[30]

Citric acid is used in the food and beverage industry primarily as an acidulant, preservative, and flavor enhancer because of its tart flavor, high solubility, acidity, and buffering capabilities. It is commonly used in carbonated and non-carbonated drinks, dry powdered beverages, wines and wine coolers, jams, jellies, preserves, gelatin desserts, candies, frozen foods, and canned fruits and vegetables.[31] Citric acid is also used in household laundry detergents, pharmaceuticals, cosmetics, metal finishers (plating, electropolishing, etc.) and cleaners, durable-press textile finishing treatments, and numerous other industrial applications.[32]

Sodium citrate is used in similar applications to those of citric acid, performing either the same or additional functions.[33] Beyond the uses similar to those of citric acid in laundry detergents, carbonated beverages, dry beverage mixes, fruit drinks, jams, jellies, preserves, gelatin desserts, and candies, sodium citrate is also used in cheeses and dairy products, household cleaner products, and pharmaceuticals. In cheese and dairy products, sodium citrate

[26] Conference transcript, p. 107 (Torres).
[27] Petitions, p. 12.
[28] Zeng et al., *Citric Acid*, S&P Global, *Chemical Economics Handbook*, June 2024, p. 21.
[29] Zeng et al., *Citric Acid*, S&P Global, *Chemical Economics Handbook*, June 2024, p. 22.
[30] Petitions, pp. 12 to 13.
[31] Petitions, p. 13.
[32] Petitions, p. 13.
[33] Petitions, p. 13.

improves the emulsifying properties, texture, and melting properties, as well as acting as a preservative and aging agent. In household cleaner products, sodium citrate acts as a buffering agent and metal ion sequestrant. Sodium citrate is also used in pharmaceuticals as a diuretic and as an expectorant in cough syrups.[34]

Potassium citrate is used in pharmaceuticals as an antacid, a diuretic, an expectorant, and as a systemic and urinary alkalizer. In industrial applications, potassium citrate can be used in electropolishing and as a buffering agent. In food and beverage applications, potassium citrate has been replacing sodium citrate as a means of reducing sodium content.[35]

CACCS are generally categorized as being either genetically modified organism ("GMO") or non-GMO, predicated on the feedstock (or substrate) used in the production of the CACCS.[36] In earlier Commission CACCS proceedings, some parties argued that there are distinctions between GMO and non-GMO CACCS.[37] However, in these investigations, both the domestic producers and the Canadian producer stated that there is no difference between CACCS produced from GMO and non-GMO inputs and that the products are chemically and materially identical.[38] They also agreed that the market for non-GMO CACCS is limited in the United States,[39] with the bulk of CACCS going into products like beverages, detergents, and industrial purposes where consumers are indifferent as to whether the products contain GMO material.[40]

For certain applications, users want CACCS to be certified as non-GMO. One such certification is "Non-GMO Project" certification, which allows products to use the "butterfly logo."[41] Although the Non-GMO Project certification requires that all inputs, not just the product itself, be GMO-free, third-party labs have verified that CACCS produced by the

[34] Petitions, p. 13.

[35] Petitions, p. 14.

[36] Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 8.

[37] Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 39. Conference transcript, p. 31 (Butler).

[38] Conference transcript, p. 59 (Butler).

[39] Conference transcript, pp. 32 (Butler), 67 to 68 (Butler, Kroese, and Zeager), 83 (Rainville), and 103 (Torres).

[40] Conference transcript, pp. 32 to 33 (Butler). "JBL estimates that about 40 percent of all citric used in the United States goes to the beverage market … Another 20 to 25 percent of all citric acid is consumed in the production of detergents, and related cleaners," Conference transcript, p. 83 (Rainville).

[41] Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 1.18.

petitioners are GMO-free.[42] In the first stage of the CACCS production process, the chemical reaction during fermentation converts GMO corn into non-GMO CACCS, and subsequent filtering/purification in the second stage of the CACCS production process ensures that the final CACCS contains no GMO material.[43] However, since both the domestic and Canadian producers primarily use GMO corn as the base for their substrate, their CACCS do not meet the requirements of the Non-GMO Project to use the butterfly logo.[44]

Manufacturing process

Citric acid is produced in a two-stage process. In the first stage, sugars are fermented using a fermenting organism such as molds or yeasts. In the second stage, the crude citric acid is recovered and refined. Sodium citrate and potassium citrate are produced by reacting citric acid slurry with a solution containing certain sodium or potassium compounds (e.g., sodium hydroxide or potassium hydroxide).[45] The domestic producers produce sodium citrate and potassium citrate using some of the same equipment and workers that are used for citric acid.[46]

Citric acid is produced through fermentation. The fermentation process involves the action of specific strains of organisms such as the *Aspergillus niger* mold or the *Candida lipolytica* or *Candida guilliermondii* yeast upon a starch or sugar base, or "substrate." Petitioners use corn, along with other feedstocks such as molasses, as a substrate. JBL, the Canadian producer, also uses corn as a substrate.[47]

Once the substrate is turned into glucose, it is fermented into crude citric acid by the organism. The yield of citric acid can be optimized through the careful control of fermentation conditions, such as temperature, acidity or alkalinity, dissolved air or oxygen, and the rate of stirring of the mixture. Each fermentation reaction is done in batch in large tanks which hold several thousand gallons and achieve a citric acid yield based on the weight of the sugar.[48]

Producers ferment the substrate by one of three different methods: liquid surface culture ("shallow pan"), submerged culture ("deep tank"), or solid-state. Citric acid was originally produced using a shallow pan with a liquid surface culture technology, where microbial fermentation occurred on the surface of the liquid, but few producers currently use

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[42] "The Standard," Non-GMO Project, accessed February 23, 2026. Conference transcript, pp. 112 (Torres), 45 (Butler), and 67 (Butler, Kroese).
[43] Conference transcript, pp. 32 (Butler), 103 (Torres), and 111 (Torres).
[44] Conference transcript, pp. 32 (Butler) and 102 to 103 (Torres).
[45] Petitions, p. 14.
[46] Petitions, p. 14.
[47] Petitions, pp. 14 to 15; conference transcript, pp. 82 (Rainville) and 102 (Torres).
[48] Petitions, p. 15.

this technology. Most modern production of citric acid uses a deep tank with a submerged culture process, where the reaction is constantly agitated or stirred with air in order to allow the organism to grow throughout the mixture. Domestic producers use only the deep tank method, as the submerged culture process is favored due to the economics of increased yields, although reaction conditions must be more tightly controlled. According to the domestic producers, solid-state fermentation is used only in Japan.[49]

The second stage of production, recovery and refining, is normally performed by one of three common processes: the lime/sulfuric acid method, the solvent extraction method, or the ion exchange method. All three of these methods are compatible with either the shallow pan or deep tank fermentation processes.[50]

In the lime/sulfuric acid refining process, calcium hydroxide (lime) is added to the fermentation broth to precipitate out calcium citrate slurry, the CCC that is also part of the scope. After calcium citrate is separated by filtration, it is washed to remove soluble impurities. The citrate is then mixed with sulfuric acid to produce a citric acid/charcoal slurry and gypsum (calcium sulfate). The citric acid is then purified through evaporation, crystallization, centrifugation, and drying.[51]

The second common refining process is the solvent extraction method. This process does not involve the production of calcium citrate or gypsum. Instead, solvents separate the citric acid slurry from spent biomass. The subsequent steps of evaporation, crystallization, centrifugation, and drying are similar to those used in the lime/sulfuric acid process.[52]

The third refining method, ion exchange, is a more recent development. In this method, the slurry is passed through a bed of polymer-based resin. Ionic mineral elements such as calcium and magnesium adhere to the resin, thus removing them from the citric acid slurry. The subsequent steps are similar to the other two processes.[53]

All three refining methods produce citric acid that is dissolved in water. The temperature used for the crystallization process determines whether the anhydrous or hydrous form is produced. Some manufacturers use different equipment for crystallizing hydrous and anhydrous citric acid, whereas other manufacturers use the same equipment and adjust it accordingly to produce either the hydrous or anhydrous form of citric acid.[54]

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[49] Petitions, p. 15.
[50] Petitions, p. 16.
[51] Petitions, p. 16.
[52] Petitions, p. 16.
[53] Petitions, pp. 16 to 17.
[54] Petitions, p. 17.

Producers can either sell the citric acid or convert it into salts. U.S. producers make dihydrate sodium citrate and anhydrous sodium citrate by diverting some of the citric acid slurry to a line dedicated to citric salt production, where the slurry is reacted with sodium hydroxide or sodium carbonate. Similarly, potassium citrate is produced using the same equipment and processes by reacting citric acid slurry with potassium hydroxide or potassium carbonate.[55]

Sodium citrate and potassium citrate can also be produced by some end users or third-party distributors, known as "converters." Whether end users purchase sodium citrate / potassium citrate or purchase citric acid for conversion into sodium citrate / potassium citrate depends mainly on which option is most cost effective.[56]

CACCS are typically produced to meet most of the same FCC/USP standards and to be usable in all applications, rather than produced in different grades.[57] There are no industry standards for identifying food and non-food grades of CACCS. However, variables in the production process may result in the manufacture of slightly different qualities of CACCS. CACCS, upon testing, that does not meet FCC, USP, or other standards for use in food, beverages, or pharmaceuticals, is sold for industrial uses. The quantity of this non-FCC/USP grade production is minimal. CACCS that meets FCC/USP standards is also sold to meet demand by non-food/beverage end users.[58]

The dry forms of CACCS are packaged in polyethylene-lined paper bags, typically holding 50 pounds or 25 kilograms. "Super sacks" containing 500 to 2,000 pounds are also used. When preferred in solution form, CACCS are shipped in drums, railcars, or tank trucks. Drums are usually 200 to 275 pounds.[59]

[55] Petitions, p. 17.
[56] Petitions, p. 17.
[57] Petitions, p. 18. The domestic producers and the Canadian producer confirmed that they produce all CACCS to be FCC and USP compliant. Conference transcript, pp. 68 (Zeager) and 105 (Torres).
[58] Petitions, p. 18.
[59] Petitions, p. 18.

Domestic like product issues

No issues with respect to the domestic like product have been raised in these investigations. The petitioners propose one domestic like product consisting of all CACCS within the scope.[60] Respondent JBL accepts the petitioners' definition of the domestic like product.[61]

[60] Petitioners' postconference brief, pp. 7 to 13. The petitioners state that the Commission has found that all forms of CACCS have comprised one domestic like product in all prior related investigations and argue that because the scope of these investigations is essentially identical to the scope in prior investigations, there is no reason for the Commission to make a different domestic like product determination in these investigations. Petitioners' postconference brief, pp. 9 to 10.

[61] Respondent JBL's postconference brief, p. 3.

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

U.S. market characteristics[1]

CACCS are used in a wide variety of foods, beverages, pharmaceuticals, and cosmetics, as well as in commercial and household products including detergents and metal cleaners and in textile finishing treatments and other industrial applications.[2] CACCS are available in both dry form (granular, fine, and powder) and in aqueous solutions. CACCS in dry form are storable for multiple years and can be shipped relatively inexpensively. CACCS in aqueous solutions are shipped generally only to nearby customers.[3] Both domestic and imported CACCS are generally produced to the same FCC and USP standards.[4] The majority of responding purchasers reported that in-scope citric acid, sodium citrate, potassium citrate, and crude calcium citrate are never interchangeable with each other.[5]

All U.S. producers and importers reported that there has been no change to the product mix or marketing of CACCS since January 1, 2022. All three U.S. producers and four of eight responding importers indicated that the market was subject to distinctive conditions of competition. Specifically, all three U.S. producers reported that the production of CACCS is capital intensive, which requires a large initial investment and ongoing maintenance costs. Due to its high fixed costs, such as the cost of machinery and equipment, the CACCS business needs a high volume of production and rate of capacity utilization for a producer to make a reasonable return on investment. Importer *** reported that there is existing demand for non-GMO verified CACCS in the United States, mostly from the food industry, which it *** and that U.S.-based manufacturers can only supply extremely limited quantities given that the non-GMO corn required for non-GMO verification is not widely available in the United States. Importer *** reported that citric acid prices can depend on negotiations of other products, such as high fructose corn syrup ("HFCS").

[1] U.S. producers *** submitted responses to both the USITC's Producer's and Importer's Questionnaire. Staff removed the duplicate responses of these firms where they were identical in both questionnaires.

[2] Petitions, p. 11. Conference transcript, p. 8 (Vaughn). See also Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Inv. Nos. 731-TA-1374-1376 (Final), USITC Publication 4799 ("CACCS from Belgium, Colombia, and Thailand Original publication"), July 2018, p. 2.1.

[3] CACCS from Belgium, Colombia, and Thailand Original publication, p. 2.1.

[4] Petitions, pp. 12 to 13. CACCS from Belgium, Colombia, and Thailand Original publication, p. 2.1.

[5] One purchaser, ***, reported that these types of CACCS are always interchangeable with each other.

Apparent U.S. consumption of CACCS declined during 2022 to 2023 and increased from 2023 to 2024. Overall, apparent U.S. consumption in 2024 was lower than in 2022.[6]

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 since January 1, 2025.[7] Eight importers reported that there had been an impact, specifically that there has been a reduction in competitiveness. Importer *** reported that it observed an increase in orders from U.S. purchasers after the imposition of tariffs was announced so that these purchasers could build inventory of imported material before the effective dates of tariffs (i.e., front loading), which resulted in a reduction in orders through the second half of the year. It continued that there was no impact on ***'s production costs nor was there a significant increase in market prices as a result of tariffs because CACCS imported from Canada are not subject to import tariffs as they fall under the relevant criteria of the USMCA. It continued that it observed a drastic increase (up to 80 percent to 100 percent of monthly average) in imports from Thailand between March and July of 2025 and imports from India, with a drastic increase in U.S. imports between February and June 2025. All three U.S. producers reported that they did not know, stating that it is unclear whether the tariffs will have a positive impact on the market.

[6] Apparent U.S. consumption during January to September ("interim") 2025 was higher than interim 2024.

[7] See Part 1 "Tariff Treatment" for details on application of IEEPA tariffs in 2025.

Channels of distribution

U.S. producers sold mainly to food and beverage end users, followed by distributors and industrial end users. Importers of CACCS imported from Canada sold mainly to ***. Importers of CACCS imported from India mainly sold to distributors, as shown in table 2.1.

Table 2.1 CACCS: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; interim is January through September

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors	***	***	***	***	***
United States	Food and beverage	***	***	***	***	***
United States	Industrial	***	***	***	***	***
United States	Pharmaceutical	***	***	***	***	***
United States	Other end users	***	***	***	***	***
Canada	Distributors	***	***	***	***	***
Canada	Food and beverage	***	***	***	***	***
Canada	Industrial	***	***	***	***	***
Canada	Pharmaceutical	***	***	***	***	***
Canada	Other end users	***	***	***	***	***
India	Distributors	***	***	***	***	***
India	Food and beverage	***	***	***	***	***
India	Industrial	***	***	***	***	***
India	Pharmaceutical	***	***	***	***	***
India	Other end users	***	***	***	***	***
Subject	Distributors	***	***	***	***	***
Subject	Food and beverage	***	***	***	***	***
Subject	Industrial	***	***	***	***	***
Subject	Pharmaceutical	***	***	***	***	***
Subject	Other end users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Food and beverage	***	***	***	***	***
Nonsubject	Industrial	***	***	***	***	***
Nonsubject	Pharmaceutical	***	***	***	***	***
Nonsubject	Other end users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Food and beverage	***	***	***	***	***
All imports	Industrial	***	***	***	***	***
All imports	Pharmaceutical	***	***	***	***	***
All imports	Other end users	***	***	***	***	***

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

Geographic distribution

U.S. producers and importers reported selling CACCS to all regions in the contiguous United States (table 2.2). For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table 2.2 CACCS: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	Canada	India	Subject sources
Northeast	3	***	***	3
Midwest	3	***	***	3
Southeast	3	***	***	3
Central Southwest	3	***	***	4
Mountain	3	***	***	4
Pacific Coast	3	***	***	4
Other	3	***	***	1
All regions (except Other)	3	***	***	3
Reporting firms	3	***	***	4

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

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

Supply and demand considerations

U.S. supply

Table 2.3 provides a summary of the supply factors regarding CACCS from U.S. producers and from Canada and India.

Table 2.3 CACCS: Supply factors that affect the ability to increase shipments to the U.S. market, by country

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

Factor	Measure	United States	Canada	India
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 (firms reporting “yes”)	Count	***	***	***

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

Note: Responding U.S. producers accounted for virtually all of U.S. production of CACCS in 2024. Responding foreign producer/exporter firms accounted for virtually all of U.S. imports of CACCS from Canada and for about half of U.S. imports of CACCS from India during 2024. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 3 and 7.

Domestic production

Based on available information, U.S. producers of CACCS have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of U.S.-produced CACCS to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and some inventories. U.S. producers do not export much CACCS and cannot produce other products with the same equipment used to produce CACCS. U.S. producers’ capacity utilization was higher earlier in the period.

Subject imports from Canada

Based on available information, the sole producer, JBL, of CACCS from Canada has the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of CACCS to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the ***. Factors mitigating responsiveness of supply include ***.

Subject imports from India

Based on available information, producers of CACCS from India have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of CACCS to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. Factors mitigating responsiveness of supply include declining production capacity, limited inventories, limited ability to shift shipments from alternate markets, and ability to shift production to or from alternate products.

Imports from nonsubject sources

Nonsubject imports accounted for *** percent of total U.S. imports by quantity in 2024. The largest source of nonsubject imports during 2022 to 2024 was Thailand, which accounted for *** percent of nonsubject imports in 2024.[8]

Supply constraints

Two of three U.S. producers and five of nine responding importers reported that they had experienced supply constraints since January 1, 2022. Of those that reported they had experienced supply constraints, three importers reported the constraints occurred during 2022 and two importers reported constraints from 2023 onwards. One U.S. producer (***) reported that constraints occurred during 2023, and two U.S. producers reported supply constraints during 2024 (table 2.4). Constraints reported by domestic producers included two weather-related events that temporarily reduced production (ADM, ***),[9] a voluntary recall due to an impurity (***, 2023), and equipment repair or replacement with minimal interruption (***, 2024). Constraints reported by importers included demand during the COVID-19 pandemic, temporary extended lead times to cope with high demand possibly due to production issues of U.S. producers in 2022 and 2023, and regulatory concerns with an Indian manufacturer in 2025.

[8] Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000, and 2918.15.5000, accessed January 27, 2026. Imports are based on the imports for consumption data series.

[9] Conference transcript, pp. 55 to 56 (Butler).

Table 2.4 CACCS: Count of firms' responses regarding timing of supply constraints, by firm type and period

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

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

U.S. demand

Based on available information, the overall demand for CACCS is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the small cost share of CACCS in most of its end-use products.

End uses and cost share

U.S. demand for CACCS depends on the demand for U.S.-produced downstream products. Citric acid is the most widely used food acidulant. The acid and its derivatives are also ingredients in detergents and cleaners, personal care products, pharmaceuticals and industrial applications.[10] Reported end uses include food and beverages, such as confectionery and carbonated soft drinks; detergents; household descalers; insulation; and pharmaceuticals. CACCS accounts for a small share of the cost of the end-use products in which it is used. Most U.S. producers and importers reported CACCS accounted for between 1 and 15 percent of the total cost for some end use products.

Business cycles

All three U.S. producers and four of seven importers indicated that the market was subject to business cycles. Specifically, demand for CACCS is seasonal, with higher demand during the spring and summer months as demand for soft drinks and other beverage applications increases.[11] Contract negotiations typically take place during the third and fourth quarters of the year, with agreements generally covering deliveries for the following calendar year.[12]

[10] ***, Petitions, Exhibit 2, p. 8.

[11] Conference transcript, p. 31 (Butler), p. 58 (McLain, Butler).

[12] Conference transcript, p. 26 (Kroese).

Demand trends

Most firms reported that U.S. demand for CACCS steadily increased or fluctuated upward since January 1, 2022 (table 2.5). Petitioners described the CACCS market as a mature market with small, incremental growth year-over-year.[13] Importer *** reported that the market demand for CACCS grew steadily, but temporary declines occurred as a consequence of the COVID-19 pandemic and the resulting logistic and supply chain issues. Demand is projected to grow by *** percent annually in the next few years.[14]

Table 2.5 CACCS: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Market	Firm type	Steadily Increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
Domestic demand	U.S. producers	1	2	0	0	0
Domestic demand	Importers	3	3	0	1	0
Foreign demand	U.S. producers	0	2	0	0	0
Foreign demand	Importers	2	2	0	0	1

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

Substitute products

Substitutes for CACCS are limited. Most U.S. producers and importers reported that there were no substitutes. Importer *** reported that substitutes include malic acid and tartaric for beverage applications.

[13] Conference transcript, p. 57 (Zeager).
[14] ***, Petition, Exhibit 2, p. 26.

Substitutability issues

This section assesses the degree to which U.S.-produced CACCS and imports of CACCS from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of CACCS from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced CACCS and CACCS imported from subject sources.[15] Factors contributing to this level of substitutability include similar lead times for CACCS from inventory, reported interchangeability between domestic and subject sources, and limited significant factors other than price.

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations[16] were asked to identify the main purchasing factors their firm considered in their purchasing decisions for CACCS. The most often cited top three factors firms consider in their purchasing decisions for CACCS were price (8 firms), quality (6 firms), and availability/supply (5 firms), as shown in table 2.6. Quality was the most frequently cited first-most important factor (cited by 4 firms), followed by price (3 firms); availability/supply was the most frequently reported second-most important factor (4 firms); and price was the most frequently reported third-most important factor (4 firms).

Table 2.6 CACCS: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price / Cost	3	1	4	8
Quality	4	2	0	6
Availability / Supply	1	4	0	5
All other factors	0	1	4	NA

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

Note: Other factors include operational performance, customer requirements, location, relationship, service, and sustainability.

[15] The degree of substitution between domestic and imported CACCS depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced CACCS to the CACCS 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.).

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

Purchasers were asked how frequently they make purchasing decisions based on non-GMO certification. The majority (6 of 9) reported that they rarely or never make purchase decisions based on non-GMO certification, two sometimes do, and only one always does.

Lead times

CACCS are primarily sold from inventory. U.S. producers reported that *** percent of their commercial shipments were sold from inventory, with lead times averaging *** days. The remaining *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. U.S. importers reported that 98.5 percent of their commercial shipments were sold from foreign inventory, with lead times averaging 15 days. The remaining 1.5 percent of their commercial shipments came from U.S. inventories, with lead times averaging 7 days.

Comparison of U.S.-produced and imported CACCS

In order to determine whether U.S.-produced CACCS can generally be used in the same applications as imports from Canada and India, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.7 and 2.8, most firms reported that domestically produced CACCS and CACCS imported from Canada and India are always interchangeable. Two importers identified non-GMO certification as an important factor in interchangeability with respect to CACCS imported from nonsubject countries.

Table 2.7 CACCS: 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	3	0	0	0
United States vs. India	3	0	0	0
Canada vs. India	3	0	0	0
United States vs. Other	3	0	0	0
Canada vs. Other	3	0	0	0
India vs. Other	3	0	0	0

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

Table 2.8 CACCS: 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	3	0	0	0
United States vs. India	2	0	1	0
Canada vs. India	2	0	0	0
United States vs. Other	2	0	1	0
Canada vs. Other	2	0	1	0
India 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 CACCS from the United States, subject, or nonsubject countries. As seen in tables 2.9 and 2.10, all three U.S. producers and two of three responding importers reported that there are never significant differences other than price between domestically produced CACCS and CACCS imported from Canada. Three of five responding importers reported that there are always or frequently significant differences other than price between domestically produced CACCS and CACCS imported from India. Importer *** reported that some U.S. end users are “leery” of imported material.

Table 2.9 CACCS: 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	0	0	0	3
United States vs. India	0	0	0	3
Canada vs. India	0	0	0	3
United States vs. Other	0	0	0	3
Canada vs. Other	0	0	0	3
India vs. Other	0	0	0	3

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

Table 2.10 CACCS: 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	0	1	0	2
United States vs. India	1	2	1	1
Canada vs. India	0	1	1	1
United States vs. Other	0	0	2	1
Canada vs. Other	0	0	2	1
India vs. Other	0	0	1	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 subsidies and dumping margins was presented in Part 1 of this report and 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 three firms that accounted for all known U.S. production of CACCS during 2024.[1]

U.S. producers

The Commission issued a U.S. producer questionnaire to three firms based on information contained in the petitions. Three firms provided usable data on their operations. Table 3.1 lists U.S. producers of CACCS, their production locations, positions on the petitions, and shares of total production.

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

Shares in percent

Firm	Position on petitions	Production location(s)	Share of production
ADM	Petitioner	Southport, NC	***
Cargill	Petitioner	Eddyville, IA	***
Primient	Petitioner	Dayton, OH	***
All firms	Various	Various	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. As indicated in table 3.2, two U.S. producers are related to nonsubject foreign producers of CACCS in ***. In addition, as discussed in greater detail below, one U.S. producer purchases CACCS from ***.

[1] Conference transcript, p. 42 (McLain).

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

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

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

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

Table 3.3 CACCS: Important industry events since January 1, 2022

Item	Firm	Event
Acquisition	Primient	In April 2022, Primient/KPS Capital Partners, LP, acquired the primary interest in Tate & Lyle's citric acid operations in Decatur, IL. In July 2024, Primient/KPS Capital Partners, LP, purchased the remaining 49.7 percent ownership interest from Tate & Lyle.
Acquisition	JBL	In November 2025, JBL acquired a production facility in Thomson, IL, from International Flavors & Fragrances, Inc. JBL has not announced whether it will produce CACCS at the site.

Source: Mitchell, "Tate & Lyle's 'Primient' Launches," NowDecatur.com, April 5, 2022. "Primient Launches as a Leading Producer," Primient, April 4, 2022. "Primient Ownership Change Completed," Primient, June 27, 2024. "Jungbunzlauer Closes Acquisition of Illinois Facility," Jungbunzlauer, November 6, 2025. "Jungbunzlauer Acquires Illinois Facility from IFF," Food Engineering, November 6, 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 CACCS since January 1, 2022. All three producers indicated in their questionnaires that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

Table 3.4 CACCS: U.S. producers' reported changes in operations, since January 1, 2022

Type of change	Firm name and narrative response on changes in operations
Production curtailments	***
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. producers' installed and practical capacity and production on the same equipment. Installed overall capacity remained unchanged throughout the period for which data were collected. There was no reported production of out-of-scope products on the same equipment and machinery used to produce CACCS. Therefore, practical overall capacity, production, and capacity utilization were the same as practical CACCS capacity, production, and capacity utilization during the period for which data were collected. Practical capacity decreased from 2022 to 2023 and again in 2024. During this time all three U.S. producers reported decreases in practical capacity. Practical capacity was higher in interim 2025 compared to interim 2024, as two of three U.S producers reported higher practical capacity in interim 2025 compared to interim 2024.

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

Capacity and production in 1,000 pounds dry weight; utilization in percent; interim is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	554,323	554,323	554,323	415,741	415,741
Installed overall	Production	450,413	371,659	364,408	256,962	286,481
Installed overall	Utilization	81.3	67.0	65.7	61.8	68.9
Practical overall	Capacity	492,991	471,378	429,161	310,536	351,606
Practical overall	Production	450,413	371,659	364,408	256,962	286,481
Practical overall	Utilization	91.4	78.8	84.9	82.7	81.5
Practical CACCS	Capacity	492,991	471,378	429,161	310,536	351,606
Practical CACCS	Production	450,413	371,659	364,408	256,962	286,481
Practical CACCS	Utilization	91.4	78.8	84.9	82.7	81.5

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

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

Table 3.6 CACCS: U.S. producers' reported capacity constraints since January 1, 2022

Type of constraint	Firm name and narrative response on constraints to practical overall capacity
Fuel or energy	***
Other constraints	***

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

Table 3.7 and figure 3.7 present U.S. producers' production, capacity, and capacity utilization. Overall, from 2022 to 2024 practical capacity and production decreased. While production decreased at a higher rate from 2022 to 2023 compared to 2023 to 2024, practical capacity decreased at a higher rate from 2023 to 2024 compared to 2022 to 2023. Both practical capacity and production were higher in interim 2025 compared to interim 2024.[2] Capacity utilization was highest in 2022 and lowest in 2023. Capacity utilization was at similar levels in both interim periods.[3] As each firm accounts for *** shares of production and capacity, all three contributed to industry trends.

[2] Overall, from 2022 to 2024 all three U.S. producers experienced decreases in practical capacity and production. While two firms' practical capacity and production were higher in interim 2025 compared to interim 2024, one firm reported the same practical capacity in both interim periods and somewhat lower production in interim 2025 compared to interim 2024. During ***, ADM experienced two weather-related events causing supply disruptions from a ***. In addition, ADM reported that ***. Conference transcript, pp. 55 to 56 (Butler); ADM's U.S. producer questionnaire response, section II-2. Cargill reported that it ***.

[3] All three firms experienced similar capacity utilization trends from 2022 to 2024: a decrease in capacity utilization from 2022 to 2023 and a slight increase from 2023 to 2024. Meanwhile, one firm's capacity utilization was higher in interim 2025 compared to interim 2024, and two firms experienced the opposite.

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

Practical capacity

Capacity in 1,000 pounds dry weight; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	492,991	471,378	429,161	310,536	351,606

Table continued.

Table 3.7 (Continued) CACCS: U.S. producers' output, by firm and period

Production

Production in 1,000 pounds dry weight; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	450,413	371,659	364,408	256,962	286,481

Table continued.

Table 3.7 (Continued) CACCS: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	91.4	78.8	84.9	82.7	81.5

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

Table continued.

Table 3.7 (Continued) CACCS: U.S. producers' output, by firm and period

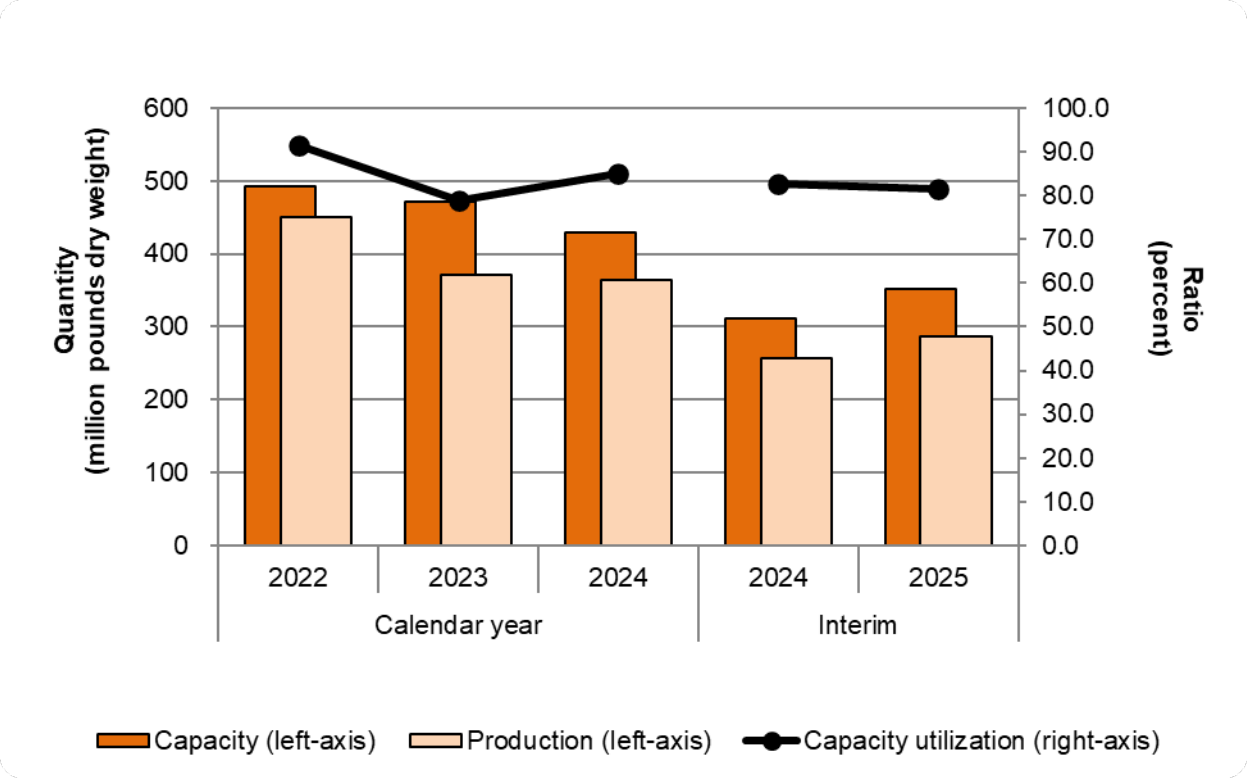
Share of production

Share of production in percent; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
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 CACCS: U.S. producers' output, by period



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

Alternative products

U.S. producers did not report any out-of-scope products being produced on the same equipment and machinery used to produce in-scope CACCS.

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

Table 3.8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. producers' U.S. shipments accounted for *** percent or more of all shipments throughout the period for which data were collected. During 2022 to 2024, U.S. producers' U.S. shipments decreased, both in terms of quantity and in terms of value. While quantity decreased at a higher rate from 2022 to 2023, value decreased at a higher rate from 2023 to 2024. As a result, the unit value of U.S producers' U.S. shipments was highest in 2023 and lowest in 2024. U.S. producers' U.S. shipments, in terms of quantity, were higher in interim 2025 compared to interim 2024, while U.S. producers' U.S. shipments, in terms of value, were lower in interim 2025 compared to interim 2024. As a result, the unit value of U.S. producers' U.S. shipments was lower in interim 2025 compared to interim 2024.[4] U.S. producers' exports, which accounted for *** percent or less of U.S. producers' total shipments during each of the periods examined, decreased both in terms of quantity and value from 2022 to 2024, and were lower in interim 2025 compared to interim 2024.

[4] ***. Follow-up response from ***, February 9, 2026.

Table 3.8 CACCS: U.S. producers' shipments, by destination and period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars; unit value in dollars per pound dry weight; shares in percent; interim is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. shipments	Quantity	439,791	361,502	327,784	252,842	263,737
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	519,591	452,832	335,406	256,337	253,089
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	1.18	1.25	1.02	1.01	0.96
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.

Table 3.9 presents U.S. producers' U.S. shipments by type and table 3.10 presents narrative responses regarding U.S. producers' reported transfers to related firms. During 2022 and 2023, U.S. producers' commercial U.S. shipments accounted for over *** percent of total U.S. shipments, while in 2024 and both interim periods, U.S. producers' commercial U.S. shipments accounted for between *** percent and *** percent of total U.S. shipments. Internal consumption (reported by ***) accounted for less than *** percent of total U.S. shipments in every period examined, whereas transfers to related firms (reported by *** and ***) accounted for the residual shares (ranging from *** percent of total U.S. shipments in 2022 to *** percent in interim 2024).

Table 3.9 CACCS: U.S. producers' U.S. shipments, by type and period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars; unit value in dollars per pound dry weight; shares in percent; interim is January through September

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	439,791	361,502	327,784	252,842	263,737
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	519,591	452,832	335,406	256,337	253,089
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	1.18	1.25	1.02	1.01	0.96
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: *** Follow-up response from ***, February 9, 2026.

Table 3.10: CACCS: U.S. producers' narrative responses regarding transfers to related firms , since January 1, 2022

Firm	Narrative response on transfers to related firms
***	***
***	***

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

U.S. producers' inventories

Table 3.11 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. All three U.S. producers reported end-of-period inventories from 2022 to 2024 and in both interim periods. U.S. producers' combined inventories increased annually from 2022 to 2024 and were higher in interim 2025 compared to interim 2024. *** accounted for the largest share of inventories throughout the period for which data were collected (accounting for over *** of inventories during 2022 to 2024 and interim 2025). From 2022 to 2024, U.S. producers' ending inventories as a ratio to U.S. production, U.S. shipments, and total shipments increased, and were higher in interim 2025 compared to interim 2024.

Table 3.11 CACCS: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds dry weight; ratio in percent; interim is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	39,559	44,560	76,186	44,580	95,621
Inventory ratio to U.S. production	8.8	12.0	20.9	13.0	25.0
Inventory ratio to U.S. shipments	9.0	12.3	23.2	13.2	27.2
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

No U.S. producer reported imports of CACCS from subject sources during 2022 to 2024 or in either interim period.

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

U.S. producers' purchases of imports from subject sources are presented in table 3.12 and narrative responses regarding these purchases are presented in table 3.13.[5]

Table 3.12 CACCS: *'s purchases of imports from subject sources, by source, importer of record, and period**

Quantity in 1,000 pounds dry weight; ratio in percent; interim is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
***'s U.S. production	Quantity	***	***	***	***	***
***'s purchases of imports from *** imported by ***	Quantity	***	***	***	***	***
***'s U.S. imports from ***	Quantity	***	***	***	***	***
Ratio 1: The producer's purchases relative to the importers' imports	Ratio	***	***	***	***	***
Overall U.S. imports from ***	Quantity	***	***	***	***	***
Ratio 2: The importers' imports relative to overall U.S. imports from ***	Ratio	***	***	***	***	***
Ratio 3: The importers' U.S. imports relative to the producer's production	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

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

[55] JBL testified that when petitioners experience shortfalls they reach out to JBL, and that petitioners receive "consideration and support from JBL in the United States." Conference transcript, p. 118 (Waite).

Table 3.13 CACCS: U.S. producers' reasons for purchasing

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

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

Note: *** also noted elsewhere in its questionnaire response that it ***.

U.S. employment, wages, and productivity

Table 3.14 shows U.S. producers' employment-related data. The number of production related workers ("PRWs") was lowest in 2022, then increased in 2023, and remained at the same level in 2024. The number of PRWs was higher in interim 2025 compared to interim 2024. Total hours worked, hours worked per PRW, total wages, hourly wages, and unit labor costs increased annually from 2022 to 2024. While total hours worked, hours worked per PRW, total wages, and unit labor costs were lower in interim 2025 compared to interim 2024, hourly wages and productivity were higher. Individual firms' PRWs and hours worked data fluctuated throughout the period for which data were collected, while wages increased for all three firms from 2022 to 2024 and were higher in interim 2025 compared to interim 2024 for all firms except ***, which reported lower wages paid in interim 2025 than in interim 2024.

Table 3.14 CACCS: U.S. producers' employment related information, by period

Interim is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	340	354	354	354	363
Total hours worked (1,000 hours)	575	610	622	485	473
Hours worked per PRW (hours)	1,691	1,723	1,757	1,370	1,303
Wages paid ($1,000)	28,092	30,848	32,739	25,741	25,596
Hourly wages (dollars per hour)	$48.86	$50.57	$52.64	$53.07	$54.11
Productivity (pounds dry weight per hour)	783.3	609.3	585.9	529.8	605.7
Unit labor costs (dollars per pound)	$0.06	$0.08	$0.09	$0.10	$0.09

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

Note: ***. Follow-up response from ***, February 9, 2026.

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

U.S. importers

The Commission issued importer questionnaires to 34 firms believed to be importers of subject CACCS, as well as to all U.S. producers of CACCS.[1] Usable questionnaire responses were received from 12 companies, representing *** percent of U.S. imports from Canada and *** percent of U.S. imports from India in 2024 under HTS statistical reporting numbers 2918.14.0000, 2918.15.1000, and 2918.15.5000. Table 4.1 lists all responding U.S. importers of CACCS from Canada, India, and other sources, their locations, and their shares of U.S. imports, in 2024.

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

Share in percent

Firm	Headquarters	Canada	India	Subject sources	Nonsubject sources	All import sources
Cargill	Wayzata, MN	***	***	***	***	***
Citribel	Tienen, Belgium	***	***	***	***	***
Daffodil	Floral Park, NY	***	***	***	***	***
FY Ingredients	Sheridan, WY	***	***	***	***	***
Gadot	Florida, NY	***	***	***	***	***
Givaudan	Cincinnati, OH	***	***	***	***	***
JBL	Newton, MA	***	***	***	***	***
Primient	Schaumburg, IL	***	***	***	***	***
Prinova	Itasca, IL	***	***	***	***	***
Refresco	Tampa, FL	***	***	***	***	***
UMC	Lyndhurst, NJ	***	***	***	***	***
Westco	North Hollywood, CA	***	***	***	***	***
All firms	Various	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 “—”.

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

U.S. imports

Table 4.2 presents data for U.S. imports of CACCS from Canada, India, and all other sources.[2] U.S. imports of CACCS from Canada, in terms of quantity, decreased from 2022 to 2023, but increased in 2024 to levels higher than those reported in 2022. Imports of CACCS from Canada, in terms of value, increased in each annual period from 2022 to 2024. As a result of the value of imports of CACCS from Canada increasing while the quantity decreased, the unit value of imports from Canada *** to its highest value from 2022 to 2023. The unit value of imports from Canada then decreased by about *** from 2023 to 2024 to a level higher in 2024 than 2022. The unit values of imports of CACCS from Canada, both in terms of quantity and in terms of value, were lower in interim 2025 compared to interim 2024.

U.S. imports of CACCS from India, in terms of quantity, fluctuated from 2022 to 2024 reaching their highest point in 2023, while imports from India, in terms of value, decreased annually from 2022 to 2024. As a result, the unit value of imports of CACCS from India decreased from 2022 to 2023 at a much greater rate than the decrease from 2023 to 2024. Imports from India, in terms of quantity and in terms of value, were higher in interim 2025 compared to interim 2024, while the unit value of these imports were lower in interim 2025 compared to interim 2024.[3]

From 2022 to 2024, U.S. imports of CACCS from nonsubject sources increased in each annual period while imports from nonsubject sources, in terms of value, experienced the opposite trend and decreased in each annual period. The unit value of imports from nonsubject sources decreased in each annual period from 2022 to 2024. Imports from nonsubject sources, in terms of quantity and in terms of value, were higher in interim 2025 compared to interim 2024, while the unit value of these imports were lower in interim 2025 compared to interim 2024.

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[2] Import data are also shown for Thailand separately, a country currently under an antidumping duty order, which JBL argues has taken U.S. market share from both the domestic producers and JBL. Conference transcript, p. 12 (Waite). Imports of CACCS from Thailand, which accounted for a smaller share of total imports than subject imports in every period examined, increased in absolute quantities in addition to as a share of total imports from 2022 to 2024, and were higher in interim 2025 compared with interim 2024. The unit values of imports from Thailand were lower than the unit values of aggregate subject imports in every period examined other than in 2022.

[3] Respondent JBL argues that there are no imports of Indian-origin CACCS as it believes that there is no production of citric acid in India. Instead, it argues that the country of origin of the citric acid imported from India is actually produced in third countries, primarily if not exclusively in China. It added that there may be processing in India of citric acid into certain citrate salts. Respondent JBL's postconference brief, pp. 10 to 11. See Part 7 for a description of the production process of individual firms in India that responded to the Commission's questionnaire in these investigations.

U.S. imports from subject sources accounted for a fluctuating share of total U.S. imports of CACCS from 2022 to 2024, in terms of quantity and an annually increasing share of total U.S. imports, in terms of value. Imports from Canada accounted for the large majority of the share of subject imports throughout the period for which data were collected. U.S. imports from subject sources held a lower share of total U.S. imports, both in terms of quantity and in terms of value, in interim 2025 compared to interim 2024.

The ratio of subject imports to U.S. production fell from 2022 to 2023, but increased in 2024 to a level higher than that reported in 2022. That ratio was lower in interim 2025 than in interim 2024.

Table 4.2 CACCS: U.S. imports by source and period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars; unit value in dollars per pound dry weight; interim is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Canada	Quantity	***	***	***	***	***
India	Quantity	21,231	34,086	27,633	20,611	35,573
Subject sources	Quantity	***	***	***	***	***
Thailand	Quantity	133,588	176,640	181,559	138,373	171,993
All other sources	Quantity	165,500	151,230	164,543	117,472	125,285
Nonsubject sources	Quantity	299,088	327,869	346,102	255,845	297,277
All import sources	Quantity	***	***	***	***	***
Canada	Value	***	***	***	***	***
India	Value	40,906	33,208	24,532	18,436	29,217
Subject sources	Value	***	***	***	***	***
Thailand	Value	203,451	182,496	155,396	114,218	129,878
All other sources	Value	252,684	220,955	195,406	148,149	139,321
Nonsubject sources	Value	456,135	403,451	350,803	262,367	269,198
All import sources	Value	***	***	***	***	***
Canada	Unit value	***	***	***	***	***
India	Unit value	1.93	0.97	0.89	0.89	0.82
Subject sources	Unit value	***	***	***	***	***
Thailand	Unit value	1.52	1.03	0.86	0.83	0.76
All other sources	Unit value	1.53	1.46	1.19	1.26	1.11
Nonsubject sources	Unit value	1.53	1.23	1.01	1.03	0.91
All import sources	Unit value	***	***	***	***	***

Table continued.

Table 4.2 (Continued) CACCS: U.S. imports by source and period

Shares and ratio in percent; interim is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Canada	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Thailand	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Canada	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Canada	Ratio	***	***	***	***	***
India	Ratio	4.7	9.2	7.6	8.0	12.4
Subject sources	Ratio	***	***	***	***	***
Thailand	Ratio	29.7	47.5	49.8	53.8	60.0
All other sources	Ratio	36.7	40.7	45.2	45.7	43.7
Nonsubject sources	Ratio	66.4	88.2	95.0	99.6	103.8
All import sources	Ratio	***	***	***	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio are U.S. imports to production.

Figure 4.1 CACCS: U.S. import quantities and average unit values, by source and period

* * * * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[4] 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.[5] Imports from Canada and India accounted for *** percent and *** percent, respectively, of total imports of CACCS by quantity from January 2025 through December 2025.

Table 4.3 CACCS: U.S. imports in the twelve-month period preceding the filing of the petitions, January 2025 through December 2025

Quantity in 1,000 pounds dry weight; share in percent

Source of imports	Quantity	Share of quantity
Canada	***	***
India	40,701	***
All other sources	***	***
All import sources	***	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed February 25, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

[4] 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)).

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

Cumulation considerations

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

Fungibility

Table 4.4 and figure 4.2 present U.S. producers' U.S. shipments and U.S. importers' U.S. imports by product type (citric acid, sodium citrate, potassium citrate and crude calcium citrate). In 2024, U.S. producers and U.S. importers from Canada and India reported U.S. shipments and U.S. imports, respectively, in three of the four types (citric acid, sodium citrate, and potassium citrate).[6] U.S. importers from nonsubject sources reported U.S. imports in all four types. The largest share of U.S. producers' U.S. shipments and U.S. importers' U.S. imports from Canada and nonsubject sources was citric acid, while the largest share of U.S. importers' U.S. imports from India was sodium citrate.

Table 4.5 and figure 4.3 present U.S. producers' U.S. shipments and U.S. importers' U.S. imports by certification status (non-GMO project (butterfly label) verified; other non-GMO certification or claim; or other (i.e., GMO, or otherwise not certified as non-GMO)). U.S. producers and U.S. importers from subject sources did not report any U.S. shipments or U.S. imports, respectively, of non-GMO project (butterfly label) verified CACCS.[7] U.S. producers and U.S. importers from India reported U.S. shipments and U.S. imports, respectively, in two of three categories (other non-GMO certified and other (i.e., GMO)) and U.S. importers from

[6] An industry witness testified that ADM is able to produce CACCS in all four categories. Conference transcript, p. 44 (McLain).

[7] U.S. producers of CACCS do not produce CACCS to the non-GMO project (butterfly label) verification since non-GMO corn-derived substrates are not available as raw material inputs in the CACCS production process in the United States. However, U.S. producers testified that their product qualifies as a non-GMO product by virtue of its manufacturing process that extracts all genetically modified material. Conference transcript, pp. 45 (McLain), 66 to 67 (Vaughn), and 67 (Butler and Kroese).

Canada reported U.S. imports in only the other (i.e., GMO) category.[8] U.S. importers from nonsubject sources reported imports in all three categories. Additional information on U.S. producers' U.S. shipments and U.S. importers' U.S. imports by product type and non-GMO certification status are presented in appendix D.

Table 4.4: CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and product type

Quantity in 1,000 pounds dry weight

Source	Citric acid	Sodium citrate	Potassium citrate	Crude calcium citrate	All product types
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
India	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table 4.4 (Continued): CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and product type

Share across in percent

Source	Citric acid	Sodium citrate	Potassium citrate	Crude calcium citrate	All product types
U.S. producers	***	***	***	***	100.0
Canada	***	***	***	***	100.0
India	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

[8] JBL testified that it does not sell non-GMO project (butterfly label) verified CACCS from its Canada location since it cannot source non-GMO corn substrate but that similar to the U.S.-produced CACCS, its product has no trace of genetically modified material by virtue of its production process. It added that its Austrian facility can offer the non-GMO project (butterfly label) verified CACCS produced from non-GMO corn substrate. Conference transcript, p. 103 (Torres).

Table 4.4 (Continued): CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and product type

Share down in percent

Source	Citric acid	Sodium citrate	Potassium citrate	Crude calcium citrate	All product types
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
India	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

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

Figure 4.2 CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and product type

* * * * * * *

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

Table 4.5: CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and certification status

Quantity in 1,000 pounds dry weight

Source	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All certification statuses
U.S. producers	***	***	***	***
Canada	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table 4.5 (Continued) CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and certification status

Share across in percent

Source	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All certification statuses
U.S. producers	***	***	***	100.0
Canada	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table 4.5 (Continued) CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and certification status

Share down in percent

Source	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All certification statuses
U.S. producers	***	***	***	***
Canada	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

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

Figure 4.3: CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by source and certification status

* * * * * * *

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

Geographical markets

Table 4.6 presents data on U.S. imports by source and border of entry in 2024. Imports from all sources entered through all borders of entry in 2024, except no imports from Cananda entered through the Southern or Western borders of entry. Entries of U.S. imports through the Eastern border accounted for the largest share of U.S. imports from India and nonsubject sources, whereas entries through the Northern border accounted for the largest share of U.S. imports from Canada.

Table 4.6 CACCS: U.S. imports by source and border of entry, 2024

Quantity in 1,000 pounds dry weight

Source	East	North	South	West	All borders
Canada	***	***	***	***	***
India	9,241	8,334	7,613	2,445	27,633
Subject sources	***	***	***	***	***
Nonsubject sources	145,624	46,965	39,138	114,375	346,102
All import sources	***	***	***	***	***

Table continued.

Table 4.6 (Continued) CACCS: U.S. imports by source and border of entry, 2024

Share in percent

Source	East	North	South	West	All borders
Canada	***	***	***	***	100.0
India	33.4	30.2	27.5	8.8	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	42.1	13.6	11.3	33.0	100.0
All import sources	***	***	***	***	100.0

Table continued.

Table 4.6 (Continued) CACCS: U.S. imports by source and border of entry, 2024

Share in percent

Source	East	North	South	West	All borders
Canada	***	***	***	***	***
India	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

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

Presence in the market

Table 4.7 and figures 4.4 and 4.5 present data on U.S. imports by source and month from January 2022 to September 2025. Imports from Canada, India, and nonsubject sources were present in all 45 months in this period.

Table 4.7 CACCS: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds dry weight

Year	Month	Canada	India	Subject sources	Nonsubject sources	All import sources
2022	January	***	2,954	***	33,958	***
2022	February	***	1,813	***	32,410	***
2022	March	***	2,161	***	35,505	***
2022	April	***	2,583	***	32,757	***
2022	May	***	3,790	***	29,356	***
2022	June	***	2,591	***	26,870	***
2022	July	***	1,646	***	18,450	***
2022	August	***	491	***	18,571	***
2022	September	***	675	***	15,090	***
2022	October	***	946	***	21,960	***
2022	November	***	683	***	14,735	***
2022	December	***	896	***	19,425	***
2023	January	***	2,626	***	20,178	***
2023	February	***	2,258	***	17,015	***
2023	March	***	3,016	***	26,239	***
2023	April	***	1,657	***	29,142	***
2023	May	***	2,181	***	25,949	***
2023	June	***	2,617	***	27,067	***
2023	July	***	2,554	***	30,940	***
2023	August	***	2,010	***	32,073	***
2023	September	***	2,690	***	29,978	***
2023	October	***	4,245	***	32,763	***
2023	November	***	4,425	***	26,347	***
2023	December	***	3,808	***	30,179	***

Table continued.

Table 4.7 (Continued): CACCS: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds dry weight

Year	Month	Canada	India	Subject sources	Nonsubject sources	All import sources
2024	January	***	2,358	***	25,472	***
2024	February	***	3,062	***	23,864	***
2024	March	***	3,159	***	28,288	***
2024	April	***	2,789	***	33,065	***
2024	May	***	2,326	***	29,766	***
2024	June	***	2,400	***	28,334	***
2024	July	***	2,014	***	27,455	***
2024	August	***	1,340	***	30,265	***
2024	September	***	1,163	***	29,336	***
2024	October	***	1,329	***	35,306	***
2024	November	***	2,405	***	28,533	***
2024	December	***	3,288	***	26,418	***
2025	January	***	4,116	***	30,942	***
2025	February	***	3,888	***	24,525	***
2025	March	***	4,553	***	37,299	***
2025	April	***	4,069	***	32,710	***
2025	May	***	4,939	***	34,828	***
2025	June	***	2,608	***	40,375	***
2025	July	***	5,125	***	41,452	***
2025	August	***	2,390	***	24,269	***
2025	September	***	3,885	***	30,876	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Figure 4.4 CACCS: U.S. imports from individual subject sources, by month

* * * * * * *

Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Figure 4.5 CACCS: U.S. imports from aggregated subject and nonsubject sources, by month

* * * * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Apparent U.S. consumption and market shares

Quantity

Table 4.8 and figure 4.6 present data on apparent U.S. consumption and U.S. market shares by quantity for CACCS. Apparent U.S. consumption was highest in 2022 and lowest in 2023. Apparent U.S. consumption was higher in interim 2025 compared to interim 2024. Overall, from 2022 to 2024, U.S. producers accounted for a decreasing share of apparent U.S. consumption while imports from Canada, India, and nonsubject sources accounted for increasing shares. The share of apparent U.S. consumption accounted for by U.S. imports from India and nonsubject sources were higher in interim 2025 compared to interim 2024 while the share of apparent U.S. consumption accounted for by U.S. producers and imports from Canada were lower in interim 2025 compared to interim 2024.

Table 4.8 CACCS: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 pounds dry weight; shares in percent; interim is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
India	Quantity	21,231	34,086	27,633	20,611	35,573
Subject sources	Quantity	***	***	***	***	***
Thailand	Quantity	133,588	176,640	181,559	138,373	171,993
All other sources	Quantity	165,500	151,230	164,543	117,472	125,285
Nonsubject sources	Quantity	299,088	327,869	346,102	255,845	297,277
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaire and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Figure 4.6 CACCS: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaire and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Value

Table 4.9 and figure 4.7 present data on apparent U.S. consumption and U.S. market shares by value for CACCS. From 2022 to 2024 apparent U.S. consumption decreased annually and was lowest in 2024. Apparent U.S. consumption was lower in interim 2025 compared to interim 2024. Overall, from 2022 to 2024, U.S. producers and imports from India and nonsubject sources accounted for decreasing shares of apparent U.S. consumption while imports from Canada accounted for an increasing share. The shares of apparent U.S. consumption accounted for by U.S. producers and imports from India and nonsubject sources were higher in interim 2025 compared to interim 2024, while the share of apparent U.S. consumption accounted for by U.S. imports from Canada was lower in interim 2025 compared to interim 2024.

Table 4.9 CACCS: 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 September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
Canada	Value	***	***	***	***	***
India	Value	40,906	33,208	24,532	18,436	29,217
Subject sources	Value	***	***	***	***	***
Thailand	Value	203,451	182,496	155,396	114,218	129,878
All other sources	Value	252,684	220,955	195,406	148,149	139,321
Nonsubject sources	Value	456,135	403,451	350,803	262,367	269,198
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaire and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Figure 4.7 CACCS: Apparent U.S. consumption based on value, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaire and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series.

Part 5: Pricing data

Factors affecting prices[1]

Raw material costs

The primary raw material for CACCS production is a starch ("substrate") that is fermented by yeast or mold to produce CACCS. The substrate varies by producer depending on proximity to the production plant and cost, which varies by region. Domestically produced CACCS begins with a corn starch substrate.[2] Raw materials, as a share of U.S. producers' cost of goods sold ("COGS"), declined from 2022 to 2024, but were slightly higher in interim 2025 compared with interim 2024. Corn prices fluctuated between January 2022 and December 2025; the price of corn received by farmers increased by 32.3 percent from January 2022 to June 2022, when it reached its period peak of $7.38 per bushel, then declined by 45.8 percent thereafter to $4.00 per bushel in September 2025 (figure 5.1 and table 5.1). Overall, corn prices declined by 28.3 percent from January 2022 to September 2025.[3] Corn prices continued to decline in October and November 2025 but increased to $4.10 per bushel in December 2025.

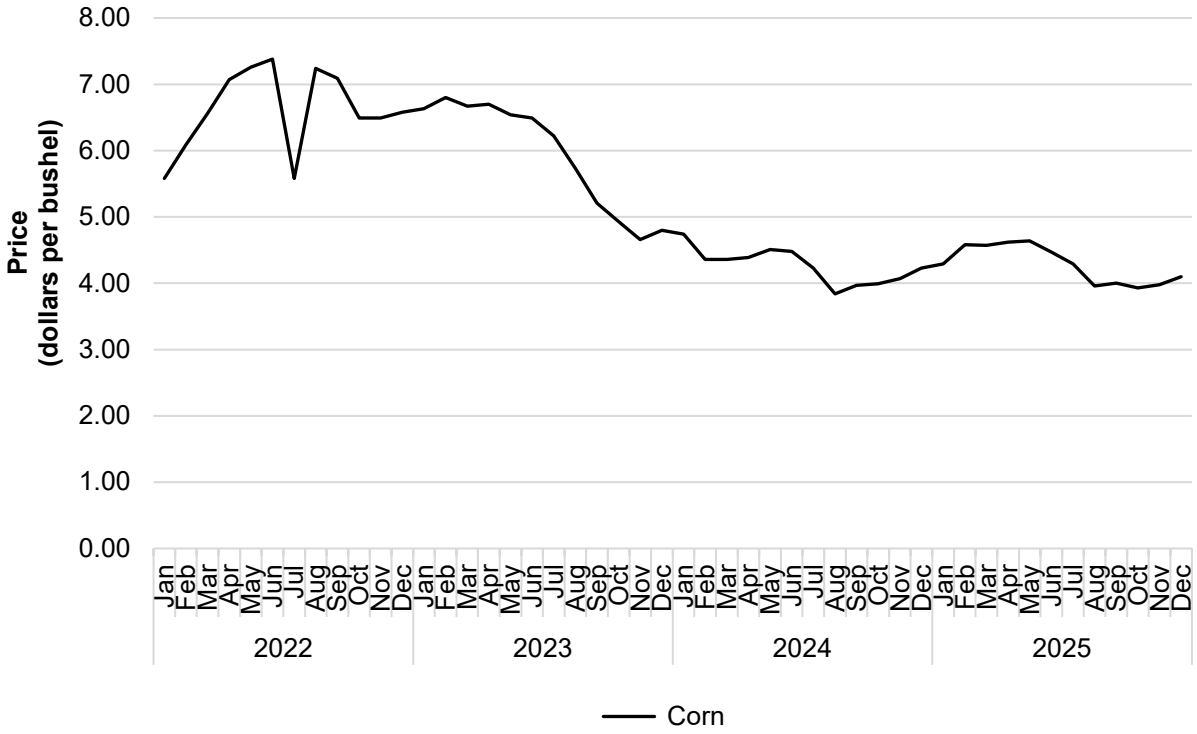
Two U.S. producers and five importers reported that raw material costs either fluctuated up or steadily increased since January 1, 2022, while one U.S. producer and four importers reported that they fluctuated down. Importer *** reported that there was a significant increase in the cost of raw materials in 2022 that persisted into 2023 due to elevated inflation rates and ongoing geopolitical disruptions. It added that, while raw material prices declined in 2024 and 2025, they remained above 2021 levels as inflationary pressures and geopolitical challenges continued to influence the market. Lastly, *** stated that corn costs are affected by prevailing market conditions, as well as fluctuations in the Chicago Board of Trade ("CBOT") and local basis costs related to storage and delivery.

[1] U.S. producers *** submitted responses to both the USITC's Producer's and Importer's Questionnaire. Staff removed the duplicate responses of these firms where they were identical in both questionnaires.

[2] CACCS from Belgium, Colombia, and Thailand Original publication, p. 5.1.

[3] Petitioner ADM stated that it uses net corn cost when calculating manufacturing costs. Net corn costs consist of the gross corn cost, such as the Chicago Board of Trade or USDA prices, plus or minus the cost of getting the corn to its facilities, and co-product credits. Conference transcript, pp. 62 to 63 (Butler).

Figure 5.1 Raw materials: Prices Received for Corn, by month, January 2022 to December 2025



Source: USDA National Agricultural Statistics Service (NASS), Prices Received: Corn Prices Received by Month, US, https://www.nass.usda.gov/Charts_and_Maps/Agricultural_Prices/pricecn.php, accessed February 9, 2026.

Table 5.1 Raw materials: Prices Received for Corn, by month, January 2022 to December 2025

Price in dollars per bushel

Month	2022	2023	2024	2025
January	5.58	6.63	4.74	4.29
February	6.09	6.80	4.36	4.58
March	6.56	6.67	4.36	4.57
April	7.07	6.70	4.39	4.62
May	7.26	6.54	4.51	4.64
June	7.38	6.49	4.48	4.47
July	5.58	6.22	4.23	4.29
August	7.24	5.73	3.84	3.96
September	7.09	5.21	3.98	4.00
October	6.49	4.93	3.99	3.93
November	6.49	4.66	4.07	3.98
December	6.58	4.80	4.23	4.10

Source: USDA National Agricultural Statistics Service (NASS), Prices Received: Corn Prices Received by Month, US, https://www.nass.usda.gov/Charts_and_Maps/Agricultural_Prices/pricecn.php, accessed February 9, 2026.

Transportation costs to the U.S. market

Transportation costs for CACCS shipped from subject countries to the United States averaged 4.0 percent for Canada and 10.2 percent for India during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.[4]

U.S. inland transportation costs

One responding U.S. producer and four importers reported that they typically arrange transportation to their customers while two U.S. producers and four importers reported that the purchaser typically arranges transportation.[5] U.S. producers reported that their U.S. inland transportation costs ranged from 6.0 to 13.0 percent while responding importers reported costs of 1.0 to 4.0 percent.

Pricing practices

Pricing methods

Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations and contracts (table 5.2).

Table 5.2 CACCS: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Subject importers
Transaction-by-transaction	2	6
Contract	3	3
Set price list	0	1
Other	0	1
Responding firms	3	7

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.

[4] 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 numbers 2918.14.0000, 2918.15.1000, and 2918.15.5000.

[5] Importer *** reported that both it and its customers arrange transportation.

U.S. producers and importers reported selling most of their CACCS under annual and long-term contracts (table 5.3).[6] Specifically, U.S. producers *** and importers *** reported the vast majority of their sales were under annual contracts, U.S. producer *** reported the vast majority of its sales were under long-term contracts, and importer *** reported the majority of its sales were under short-term contracts.

Table 5.3 CACCS: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

Type of sale	U.S. producers	Subject importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

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

Note: Because of rounding, figures may not add to the totals shown.

U.S. producers ***'s contracts do not allow price renegotiation, fix both price and quantity, and are not indexed to raw material costs, no matter the contract length. U.S. producer ***'s annual and long-term contracts fix price and are not indexed to raw material costs; its long-term contracts do allow for price renegotiation. Importers' contracts similarly fix quantity and price and are not indexed to raw material costs. Importers *** allow for price renegotiation for their annual contracts, while importer *** does not.

Sales terms and discounts

All three U.S. producers and three importers typically quote prices on an f.o.b. basis; four importers reported they typically quote delivered prices. Most U.S. producers and importers do not have a discount policy; U.S. producer *** reported quantity and total volume discounts, importers *** reported offering quantity discounts, and importer *** reported offering total volume discounts.

[6] See also, conference transcript, p. 26 (Kroese).

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 CACCS products shipped to unrelated U.S. customers during January 2022 to September 2025.

Product 1.-- Citric acid, fine granular, in dry form in 25 kilogram and 50 pound bags.

Product 2.-- Citric acid, granular, in dry form packed in bulk sacks ("supersacks") with a capacity of at least 1,000 pounds.

Product 3.-- Sodium citrate, granular, in dry form in 25 kilogram and 50 pound bags.

Product 4.-- Sodium citrate, granular, in dry form packed in bulk sacks ("supersacks") with a capacity of at least 1,000 pounds.

Three U.S. producers and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[7] Pricing data reported by these firms accounted for approximately 43.9 percent of U.S. producers' U.S. shipments of CACCS, *** percent of U.S. shipments of subject imports from Canada, and *** percent of U.S. shipments of subject imports from India in 2024.[8] Price data for products 1 to 4 are presented in tables 5.4 to 5.7 and figures 5.2 to 5.5.

[7] Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

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

Table 5.4 CACCS: 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 dollars per pound dry weight, quantity in pounds dry weight, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***

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

Note: Product 1: Citric acid, fine granular, in dry form in 25 kilogram and 50 pound bags.

Note: Respondent contends that ***. Respondent JBL's postconference brief, p. 19.

Figure 5.2 CACCS: 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: Citric acid, fine granular, in dry form in 25 kilogram and 50 pound bags.

Table 5.5 CACCS: 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 dollars per pound dry weight, quantity in pounds dry weight, 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	***	***	***	***	***
2025 Q3	***	***	***	***	***

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

Note: Product 2: Citric acid, granular, in dry form packed in bulk sacks (“supersacks”) with a capacity of at least 1,000 pounds.

Figure 5.3 CACCS: 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: Citric acid, granular, in dry form packed in bulk sacks (“supersacks”) with a capacity of at least 1,000 pounds.

Table 5.6 CACCS: 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 dollars per pound dry weight, quantity in pounds dry weight, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***

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

Note: Product 3: Sodium citrate, granular, in dry form in 25 kilogram and 50 pound bags.

Figure 5.4 CACCS: 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: Sodium citrate, granular, in dry form in 25 kilogram and 50 pound bags.

Table 5.7 CACCS: 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 dollars per pound dry weight, quantity in pounds dry weight, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin	India price	India quantity	India 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	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***

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

Note: Product 4: Sodium citrate, granular, in dry form packed in bulk sacks (“supersacks”) with a capacity of at least 1,000 pounds.

Figure 5.5 CACCS: 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: Sodium citrate, granular, in dry form packed in bulk sacks (“supersacks”) with a capacity of at least 1,000 pounds.

Price trends

In general, prices decreased during January 2022 to September 2025. Table 5.8 summarizes the price trends, by country and by product. As shown in the table, domestic price decreases ranged from *** to *** percent during January 2022 to September 2025 while import price decreases ranged from *** to *** percent.

Table 5.8 CACCS: Summary of price data, by product and source, January 2022 to September 2025

Quantity in pounds dry weight, price in dollars per pound dry weight

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	15	***	***	***	***	***	***
Product 1	Canada	15	***	***	***	***	***	***
Product 1	India	15	***	***	***	***	***	***
Product 2	United States	15	***	***	***	***	***	***
Product 2	Canada	15	***	***	***	***	***	***
Product 2	India	—	***	***	***	***	***	***
Product 3	United States	15	***	***	***	***	***	***
Product 3	Canada	15	***	***	***	***	***	***
Product 3	India	15	***	***	***	***	***	***
Product 4	United States	15	***	***	***	***	***	***
Product 4	Canada	15	***	***	***	***	***	***
Product 4	India	11	***	***	***	***	***	***

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.

Price comparisons

As shown in tables 5.9 to 5.11, prices for product imported from Canada were below those for U.S.-produced product in 46 of 60 instances (*** pounds dry weight); margins of underselling ranged from *** to *** percent. In the remaining 14 instances (*** pounds dry weight), prices for product from Canada were between *** and *** percent above prices for the domestic product. Prices for product imported from India were below those for U.S.-produced product in 27 of 41 instances (*** pounds dry weight); margins of underselling ranged from *** to *** percent. In the remaining 14 instances (*** pounds dry weight), prices for product from India were between *** and *** percent above prices for the domestic product.

Table 5.9 CACCS: Instances of underselling and overselling and the range and average of margins, by product

Quantity in pounds dry weight; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	17	***	***	***	***
Product 2	Underselling	12	***	***	***	***
Product 3	Underselling	27	***	***	***	***
Product 4	Underselling	17	***	***	***	***
Total, all products	Underselling	73	***	***	***	***
Product 1	Overselling	13	***	***	***	***
Product 2	Overselling	3	***	***	***	***
Product 3	Overselling	3	***	***	***	***
Product 4	Overselling	9	***	***	***	***
Total, all products	Overselling	28	***	***	***	***

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 5.10 CACCS: Instances of underselling and overselling and the range and average of margins, by source

Quantity in pounds dry weight; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Canada	Underselling	46	***	***	***	***
India	Underselling	27	***	***	***	***
Total, all subject sources	Underselling	73	***	***	***	***
Canada	Overselling	14	***	***	***	***
India	Overselling	14	***	***	***	***
Total, all subject sources	Overselling	28	***	***	***	***

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 5.11 CACCS: Instances of underselling and overselling and the range and average of margins, by year

Quantity in pounds dry weight; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2022	Underselling	9	***	***	***	***
2023	Underselling	22	***	***	***	***
2024	Underselling	22	***	***	***	***
January to September 2025	Underselling	20	***	***	***	***
Total, all years	Underselling	73	***	***	***	***
2022	Overselling	18	***	***	***	***
2023	Overselling	3	***	***	***	***
2024	Overselling	6	***	***	***	***
January to September 2025	Overselling	1	***	***	***	***
Total, all years	Overselling	28	***	***	***	***

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 CACCS report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of CACCS from Canada and India during January 2022 to September 2025. Of the three responding U.S. producers, all three reported that they had to reduce prices, roll back announced price increases, and that they had lost sales. Three U.S. producers submitted lost sales and lost revenue allegations, which identified 20 firms with which they lost sales or revenue (14 consisting of lost sales allegations, 1 consisting of lost revenue allegations, and 5 consisting of both types of allegations). All allegations were with respect to Canada, with one allegation with respect to Canada and India. The majority of allegations were during 2024 and 2025.

Staff contacted 18 purchasers and received responses from 9 purchasers.[9] Responding purchasers reported purchasing *** pounds of CACCS during January 2022 to September 2025 (table 5.12).

Table 5.12 CACCS: Purchasers' reported purchases and imports, by firm and source

Quantity in 1,000 pounds dry weight, share in percent

Purchaser	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject country 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.

[9] *** submitted a lost sales lost revenue survey because ***.

During 2024, responding purchasers purchased 41.5 percent from U.S. producers, 22.8 percent from Canada, 5.1 percent from India, 10.5 percent from nonsubject countries, and 20.2 percent from "unknown source" countries. Purchasers were asked about changes in their purchasing patterns from different sources since January 1, 2022 (table 5.13). Of the responding purchasers, five reported that their purchases from domestic producers fluctuated downward or steadily decreased, two reported that their purchases fluctuated up or steadily increased, and one reported no change. Explanations for decreasing purchases of domestic product included supply constraints, availability, importers were more competitive, and lower demand. Explanations for increasing purchases of domestic product included competitive domestic pricing and tariff uncertainty for imports.

Of the responding purchasers, two reported that their purchases from Canada steadily decreased, three reported that their purchases fluctuated up or steadily increased, and two reported no change. Explanations for increasing purchases of Canadian product included unstable U.S. supply due to operational and quality issues. Explanations for decreasing purchases of Canadian product included more competitive pricing from other sources. Of the responding purchasers, one reported that its purchases from India fluctuated downward, three reported that their purchases fluctuated up, and one reported no change. Explanations for fluctuations in purchases of Indian product included qualifying an Indian source and being unable to get domestic product.

Table 5.13 CACCS: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Quantity in 1,000 pounds dry weight, share in percent

Source of purchases	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Did not purchase
United States	1	1	1	2	3	0
Canada	1	2	2	0	2	1
India	0	3	1	1	0	3
All other sources	1	3	0	3	1	0
Sources unknown	1	0	2	1	0	4

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

Of the nine responding purchasers, seven reported that, since 2022, they had purchased imported CACCS from Canada and India instead of U.S.-produced product. Five of these purchasers reported that subject import prices were lower than those for U.S.-produced product, and two of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Two purchasers estimated the quantity of CACCS from Canada and India purchased instead of domestic product; quantities ranged from *** to *** pounds dry weight (table 5.14 and 5.15). Purchasers identified supply availability as non-price reasons for purchasing imported rather than U.S.-produced product.

Table 5.14 CACCS: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds dry weight

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 7; No: 1	Yes: 5; No: 2	Yes: 2; No: 4	***	NA

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

Table 5.15 CACCS: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in 1,000 pounds dry weight

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
Canada	5	3	1	***
India	4	3	2	***
Any subject source	7	5	2	***

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

Of the nine responding purchasers, three reported that U.S. producers had reduced prices in order to compete with lower-priced imports from Canada and India; four reported that they did not know and one reported that U.S. producers had not reduced prices to compete with imports from Canada and India (table 5.16). The reported estimated price reduction ranged from *** percent. In describing the price reductions, purchaser *** indicated that price concessions are part of the contract negotiation process from all vendors.

Table 5.16 CACCS: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Reported producers lowered prices	Estimated percent of U.S. price reduction	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes: 3; No: 1	***	NA

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

Table 5.17 CACCS: Purchasers' responses to U.S. producer price reductions, by source

Source	Count of purchasers reporting U.S. producers reduced prices	Average percent of estimated U.S. price reduction	Range of percent of estimated U.S. price reductions
Canada	2	***	***
India	2	***	***
Total / average	3	***	***

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

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. Purchaser *** reported that it experienced supply constraints with U.S. producers during and after the COVID-19 pandemic that led it to diversify supply sources. *** added that it experienced higher costs sourcing material from Canada versus the United States during the period 2022 to 2025.

Part 6: Financial experience of U.S. producers

Background[1]

U.S. producers ADM, Cargill, and Primient provided usable financial results on their CACCS operations. All of the responding U.S. producers provided their financial data on the basis of GAAP. *** fiscal year ends on December 31, while ***. All firms provided financial results for their CACCS operations on a calendar-year basis. CACCS revenue mainly reflects commercial sales, but *** also reported *** and ***.[2]

Figure 6.1 presents each responding firm's 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: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] The share of total net sales accounted for by internal consumption and transfers to related parties ranged from *** percent in 2022 to *** percent in interim 2024. The ***. *** U.S. producer questionnaire response, section 2.12.

Figure 6.1 CACCS: U.S. producers' share of net sales quantity in 2024, by firm

* * * * * * *

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

Operations on CACCS

Table 6.1 presents aggregated data on U.S. producers' operations in relation to CACCS, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data.

Table 6.1 CACCS: U.S. producers' results of operations, by item and period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars; ratios in percent; interim is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	446,632	366,658	332,782	256,942	267,046
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	532,343	460,464	340,571	260,356	254,832
COGS: Raw materials	Value	88,906	91,625	76,847	57,921	61,194
COGS: Direct labor	Value	29,455	28,446	29,943	22,777	24,237
COGS: Other factory	Value	201,873	225,020	234,538	178,755	175,681
COGS: Total	Value	320,234	345,091	341,328	259,453	261,112
Gross profit or (loss)	Value	212,109	115,373	(757)	903	(6,280)
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: Raw materials	Ratio to NS	16.7	19.9	22.6	22.2	24.0
COGS: Direct labor	Ratio to NS	5.5	6.2	8.8	8.7	9.5
COGS: Other factory	Ratio to NS	37.9	48.9	68.9	68.7	68.9
COGS: Total	Ratio to NS	60.2	74.9	100.2	99.7	102.5
Gross profit	Ratio to NS	39.8	25.1	(0.2)	0.3	(2.5)
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table 6.1 (Continued) CACCS: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw materials	Share	27.8	26.6	22.5	22.3	23.4
COGS: Direct labor	Share	9.2	8.2	8.8	8.8	9.3
COGS: Other factory	Share	63.0	65.2	68.7	68.9	67.3
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	1.18	1.24	1.02	1.02	0.94
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Total net sales	Unit value	1.19	1.26	1.02	1.01	0.95
COGS: Raw materials	Unit value	0.20	0.25	0.23	0.23	0.23
COGS: Direct labor	Unit value	0.07	0.08	0.09	0.09	0.09
COGS: Other factory	Unit value	0.45	0.61	0.70	0.70	0.66
COGS: Total	Unit value	0.72	0.94	1.03	1.01	0.98
Gross profit or (loss)	Unit value	0.47	0.31	(0.00)	0.00	(0.02)
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	3	3	3	3	3

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 "—".

Table 6.2 CACCS: Changes in AUVs between comparison periods

Changes in percent; interim is January through September

Item	2022–24	2022–23	2023–24	Interim 2024–25
Commercial sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	▼(14.1)	▲5.4	▼(18.5)	▼(5.8)
COGS: Raw materials	▲16.0	▲25.5	▼(7.6)	▲1.7
COGS: Direct labor	▲36.4	▲17.6	▲16.0	▲2.4
COGS: Other factory	▲55.9	▲35.8	▲14.8	▼(5.4)
COGS: Total	▲43.1	▲31.3	▲9.0	▼(3.2)

Table continued.

Table 6.2 (Continued) CACCS: Changes in AUVs between comparison periods

Changes in dollars per pound; interim is January through September

Item	2022–24	2022–23	2023–24	Interim 2024–25
Commercial sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	▼(0.17)	▲0.06	▼(0.23)	▼(0.06)
COGS: Raw materials	▲0.03	▲0.05	▼(0.02)	▲0.00
COGS: Direct labor	▲0.02	▲0.01	▲0.01	▲0.00
COGS: Other factory	▲0.25	▲0.16	▲0.09	▼(0.04)
COGS: Total	▲0.31	▲0.22	▲0.08	▼(0.03)
Gross profit or (loss)	▼(0.48)	▼(0.16)	▼(0.32)	▼(0.03)
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 6.3 CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 pounds dry weight; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	446,632	366,658	332,782	256,942	267,046

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	532,343	460,464	340,571	260,356	254,832

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	320,234	345,091	341,328	259,453	261,112

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	212,109	115,373	(757)	903	(6,280)

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	60.2	74.9	100.2	99.7	102.5

Table continued.

Table 6.3 (Continued) CACCS: U.S. 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 September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	39.8	25.1	(0.2)	0.3	(2.5)

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim is January through September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. 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 September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. 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 September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	1.19	1.26	1.02	1.01	0.95

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	0.20	0.25	0.23	0.23	0.23

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	0.07	0.08	0.09	0.09	0.09

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	0.45	0.61	0.70	0.70	0.66

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	0.72	0.94	1.03	1.01	0.98

Table continued.

Table 6.3 (Continued) CACCS: U.S. 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 September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	0.47	0.31	(0.00)	0.00	(0.02)

Table continued.

Table 6.3 (Continued) CACCS: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. 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 September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.3 (Continued) CACCS: U.S. 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 September

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

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

Aggerate net sales quantity decreased from 2022 to 2024, but was higher in interim 2025 than in interim 2024. Commercial sales as a share of net sales quantity decreased from *** percent in 2022 to *** percent in 2024. The industry's net sales value decreased from 2022 to 2024 and was lower in interim 2025 than in interim 2024. The industry's net sales AUVs decreased irregularly from 2022 to 2024 and were lower in interim 2025 than in interim 2024.

On a company-specific basis, *** reported an overall decrease in net sales volume, net sales revenue, and net sales AUVs between 2022 and 2024. ***, reported lower net sales volume and net sales revenue in interim 2025 than in interim 2024, while ***, reported lower net sales AUVs in interim 2025 than in interim 2024.

Cost of goods sold and gross profit or loss

Raw material costs accounted for between 22.3 percent (in interim 2024) and 27.8 percent (in 2022) of aggregate COGS during the period examined. On a per-pound dry weight basis, raw material costs increased overall from $0.20 in 2022 to $0.23 in 2024, and were the same in interim 2025 and interim 2024, at $0.23 when rounded to the nearest cent. *** producers reported an overall increase in their raw material cost AUVs from 2022 to 2024 and for ***, raw material cost AUVs were higher in interim 2025 than in interim 2024.

Table 6.4 presents raw materials, by type. In 2024, *** corn, which accounted for the majority of raw material costs.

Table 6.4 CACCS: U.S. producers' raw material costs in 2024

Value in 1,000 dollars; unit values in dollars per pound; share of value in percent

Item	Value	Share of value
Corn starch substrate	***	***
Other substrates	***	***
Other material inputs	***	***
Total, raw materials	***	100.0

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

Other factory costs accounted for between 63.0 percent (in 2022) and 68.9 percent (in interim 2024) of aggregate COGS during the reporting period. Other factory costs increased from 2022 to 2024, but were lower in interim 2025 than in interim 2024. Other factory cost AUVs increased from $0.45 in 2022 to $0.70 in 2024, reflecting the combination of increased other factory costs and decreased sales volume; they were lower in interim 2025, at $0.66, than

in interim 2024, at $0.70. Other factory costs as a ratio to net sales increased from 37.9 percent in 2022 to 68.9 percent in 2024, and were higher in interim 2025, at 68.9 percent, than in interim 2024, at 68.7 percent.

*** reported an increase in per-pound dry weight basis other factory costs from 2022 to 2024, with *** reporting the largest increase.[3] *** unit other factory costs in interim 2025 than in interim 2024.

Direct labor accounted for between 8.2 percent (in 2023) and 9.3 percent (in interim 2025) of total COGS during the period examined. Direct labor costs increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024. On a per-pound dry weight basis, direct labor increased from 2022 to 2024 and was the same in interim 2025 as in interim 2024, when rounded to the nearest cent. On a company-specific basis, unit direct labor costs *** and were *** in interim 2025 than in interim 2024.

The industry's total COGS increased overall from 2022 to 2024 and was higher in interim 2025 than in interim 2024. The industry's COGS on a per-pound dry weight basis increased from $0.72 in 2022 to $1.03 in 2024, but was lower in interim 2025, at $0.98, than in interim 2024, at $1.01. *** reported an overall increase in total unit COGS from 2022 to 2024. As with other factory costs, *** had the largest increase in unit COGS during this period, but then ***.

The industry's COGS to net sales ratio increased from 60.2 percent in 2022 to 100.2 percent in 2024 and was higher in interim 2025, at 102.5 percent, than in interim 2024, at 99.7 percent. Gross profit decreased from $212.1 million in 2022 to a loss of $757,000 in 2024 and was lower in interim 2025, at a loss of $6.3 million, than in interim 2024, at $903,000.

[3] ***. Petitioners' post-conference brief, exhibit 2, p. 2. *** reported a 2023 nonrecurring expense item of $*** included within ***. The company indicated that this was related to ***. *** U.S. producer questionnaire response, sections 3.10 and 3.11.

SG&A expenses and operating income or loss

The industry's SG&A expenses increased from $*** in 2022 to $*** in 2024. ***, accounted for the increased SG&A. ***.[4] SG&A expenses for the industry were lower in interim 2025, at $*** than in interim 2024, at $***. The SG&A expense ratio (SG&A expenses divided by net sales revenue) increased from *** percent in 2022 to *** percent in 2024, but was lower in interim 2025, at *** percent, than in interim 2024, at *** percent.

Operating income decreased from $*** in 2022 to *** in 2024 and was lower in interim 2025, at ***, than in interim 2024, at ***.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income. Interest expense, which accounted for the large majority of these expenses in each year examined, decreased irregularly from $*** in 2022 to $*** in 2024 and was lower in interim 2025, at $***, than in interim 2024, at $***.[5] From 2022 to 2024, the industry's all other expenses decreased irregularly, while all other income increased irregularly but both were higher in interim 2025 than in interim 2024.

Net income followed similar directional trends as gross profit and operating income. Net income declined from $*** in 2022 to a loss of *** in 2024, and was lower in interim 2025, at a loss of $***, than in interim 2024, at a loss of $***.

[4] ***. Petitioners' post-conference brief, exhibit 2, p. 3.

[5] ***. Petitioners' post-conference brief, exhibit 2, p. 3.

Variance analysis

A variance analysis for the operations of U.S. producers of CACCS is presented in table 6.5.[6] The information for this variance analysis is derived from table 6.1. The analysis shows that from 2022 to 2024, an unfavorable cost variance was the largest factor contributing to the decrease in operating income, but that unfavorable price and volume variances were also important components of the overall trend. The analysis also shows that the lower operating income in interim 2025 when compared to interim 2024 was primarily attributable to an unfavorable price variance that was larger than a favorable cost variance.

Table 6.5 CACCS: Variance analysis on the operations of U.S. producers between comparison periods

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

Item	2022-24	2022-23	2023-24	Interim 2024-25
Net sales price variance	(56,074)	23,442	(77,350)	(15,762)
Net sales volume variance	(135,698)	(95,321)	(42,543)	10,238
Net sales total variance	(191,772)	(71,879)	(119,893)	(5,524)
COGS cost variance	(102,724)	(82,198)	(28,120)	8,544
COGS volume variance	81,630	57,341	31,883	(10,203)
COGS total variance	(21,094)	(24,857)	3,763	(1,659)
Gross profit variance	(212,866)	(96,736)	(116,130)	(7,183)
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

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

Note: These data are derived from the data in table 6.1. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

[6] The Commission's variance analysis is calculated in three parts: Net sales variance, COGS variance, and SG&A expense variance. Each part consists of a price variance (in the case of the net sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variances are calculated as the change in unit price or per-unit cost/expense, respectively, times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the operating income price variance is from sales; the operating income cost/expense variance is the sum of the cost components in the COGS and SG&A expense variances, and the operating income volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances.

Capital expenditures and research and development expenses

Table 6.6 presents capital expenditures, by firm, and table 6.8 presents R&D expenses, by firm. Tables 6.7 and 6.9 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Aggregate capital expenditures increased from 2022 to 2024, but were lower in interim 2025 than in interim 2024. As shown in table 6.6, *** accounted for the largest company-specific amounts throughout the period examined. The industry's R&D expenses, which were reported by ***, increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024.

Table 6.6 CACCS: U.S. producers' capital expenditures, by firm and period

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

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

Table 6.7 CACCS: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
ADM	***
Cargill	***
Primient	***

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

Table 6.8 CACCS: U.S. producers' R&D expenses, by firm and period

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
ADM	***	***	***	***	***
Cargill	***	***	***	***	***
Primient	***	***	***	***	***
All firms	***	***	***	***	***

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

Table 6.9 CACCS: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
ADM	***
Cargill	***
Primient	***

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

Assets and return on assets

Table 6.10 presents data on the U.S. producers' total assets while table 6.11 presents their operating ROA.[7] Table 6.12 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total net assets increased from $324.8 million in 2022 to $388.5 million in 2024. *** accounted for the majority of total assets during the period examined, while *** accounted for the majority of the increase. The industry's ROA decreased from *** percent in 2022 to *** percent in 2024.

Table 6.10 CACCS: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
ADM	***	***	***
Cargill	***	***	***
Primient	***	***	***
All firms	324,824	345,662	388,475

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

Table 6.11 CACCS: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2022	2023	2024
ADM	***	***	***
Cargill	***	***	***
Primient	***	***	***
All firms	***	***	***

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

Table 6.12 CACCS: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
ADM	***
Cargill	***
Primient	***

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

[7] 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.

Capital and investment

The Commission requested U.S. producers of CACCS to describe any actual or potential negative effects of imports of CACCS from Canada and India on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.13 presents the number of firms reporting an impact in each category and table 6.14 provides the U.S. producers' narrative responses.

Table 6.13 CACCS: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	0
Denial or rejection of investment proposal	Investment	1
Reduction in the size of capital investments	Investment	0
Return on specific investments negatively impacted	Investment	2
Other investment effects	Investment	0
Any negative effects on investment	Investment	3
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	0
Other growth and development effects	Growth	3
Any negative effects on growth and development	Growth	3
Anticipated negative effects of imports	Future	3

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

Table 6.14 CACCS: U.S. producers' 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
Denial or rejection of investment proposal	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
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	***

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 nature of the alleged subsidies was presented earlier in this report; 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."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to 24 firms believed to produce and/or export CACCS from Canada and India.[3] Usable responses to the Commission's questionnaire were received from six firms in total.[4]

Table 7.1 presents the number of producers/exporters that responded to the Commission's questionnaire, their estimated share of total production of CACCS, and their exports to the United States as a share of U.S. imports, by each subject country in 2024.

Table 7.1 CACCS: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports, by subject foreign industry, 2024

Subject foreign industry	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
Canada	1	***	***
India	5	***	***

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

Note: "Approximate share of production" reflects the responding firms' estimates of their production as a share of total country production of CACCS 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. For countries in which more than one firm responded, the average denominator for reasonably reported estimates is used in the share presented. Approximate shares are rounded to the nearest whole number.

Note: "Exports as a share of U.S. imports" reflects a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire with official Commerce import statistics using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

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 "---".

[3] These firms were identified through a review of information submitted in the petition and presented in third-party sources.

[4] ***, a responding producer of CACCS in India, reported its annual data according to the Indian financial year (April through March) and was unable to revise its questionnaire data based on a January through December reporting year. The reported annual data for this firm begins in April of the reporting year and ends in March of the following year. ***'s foreign producer questionnaire response, section II-11 and email from ***, February 24, 2026.

Table 7.2 presents information on the CACCS operations of the responding producers in Canada and India (or the responding subject producers, by firm) and table 7.3 presents summary information on responding resellers of subject CACCS. Table 7.4 presents data on foreign producers by subject foreign industry.

Table 7.2 CACCS: Summary data on responding subject foreign producers in 2024, by firm

Subject foreign industry and producer name	Production (1,000 pounds dry weight)	Share of reported production (percent)	Exports to the United States (1,000 pounds dry weight)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds dry weight)	Share of firm's total shipments exported to the United States (percent)
Canada: JBL	***	***	***	***	***	***
India: Aditya	***	***	***	***	***	***
India: Daffodil	***	***	***	***	***	***
India: PHS	***	***	***	***	***	***
India: Wang	***	***	***	***	***	***
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 CACCS: Summary data for subject foreign resellers, by firm, 2024

Subject foreign industry and reseller name	Resales exported to the United States (1,000 pounds dry weight)	Share of resales exported to the United States (percent)
India: Mireca	***	***
All individual resellers	***	100.0

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

Table 7.4 CACCS: Summary data for subject foreign producers, by firm, 2024

Subject foreign industry	Production (1,000 pounds dry weight)	Share of reported production (percent)	Exports to the United States (1,000 pounds dry weight)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds dry weight)	Share of firm's total shipments exported to the United States (percent)
Canada	***	***	***	***	***	***
India	***	***	***	***	***	***
All subject foreign industries	***	100.0	***	100.0	***	***

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

Table 7.5 presents events in the subject countries' industries since January 1, 2022.

Table 7.5 CACCS: Important industry events in the subject foreign industry since January 1, 2022

Item	Firm: Event
Expansions	***

Source: Respondent JBL's Postconference brief, exh. 2, p. 4. Zeng et al., *Citric Acid*, S&P Global, *Chemical Economics Handbook*, June 2024, pp. 49 to 50. Email from ***, February 20, 2026.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of CACCS since January 1, 2022. One producer, (*** in India), indicated in its questionnaire response that it had experienced such changes.[5] Table 7.6 presents the changes identified by this producer. No foreign producer reported any anticipated changes in operations.

Table 7.6 CACCS: Reported changes in operations in the subject countries since January 1, 2022, by change, subject foreign industry, and firm

Type of change	Subject foreign industry, firm name, and accompanying narrative response regarding changes in operations
Expansions	***

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

[5] Additionally, ***. Email from ***, February 20, 2026.

Installed and practical overall capacity

Table 7.7 presents data on subject producers' installed capacity, practical overall capacity, and practical CACCS capacity and production on the same equipment. From 2022 to 2024, installed overall capacity remained somewhat steady while practical overall capacity reached its highest level in 2023 and lowest level in 2024. Installed overall capacity was the same in both interim periods and practical overall capacity was higher in interim 2025 compared to interim 2024. Overall, installed overall capacity utilization and practical overall capacity utilization decreased from 2022 to 2024 and were higher in interim 2025 than in interim 2024.

Table 7.7 CACCS: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 pounds dry weight; utilization in percent

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 CACCS	Capacity	***	***	***	***	***
Practical CACCS	Production	***	***	***	***	***
Practical CACCS	Utilization	***	***	***	***	***

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

Note: ***. Email from *** February 24, 2026.

Constraints on capacity

Tables 7.8 and 7.9 present subject producers' reported production and capacity constraints since January 1, 2022.

Table 7.8 CACCS: Constraints on practical overall capacity, by subject foreign industry

Count in number of firms reporting

Type of constraint	Canada	India	Subject producers
Production bottlenecks	1	2	3
Existing labor force	0	1	1
Supply of material inputs	0	0	0
Fuel or energy	0	0	0
Storage capacity	0	0	0
Logistics/transportation	0	0	0
Other constraints	0	3	3

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

Table 7.9 CACCS: Subject producers' reported practical overall capacity constraints 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	***
Existing labor force	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Operations on CACCS

Aggregate CACCS operations in the subject countries

Table 7.10 presents information on the CACCS operations of the responding producers/exporters (aggregate data for all subject foreign industries). During 2022 to 2024, subject foreign producers' production and capacity decreased overall and were higher in interim 2025 compared to interim 2024. However, while capacity reached its highest level in 2023, production was lowest in 2024. Although *** accounted for a *** of subject production and capacity throughout the period for which data were collected, a large portion of the decrease in capacity in production of CACCS from 2022 to 2024 is attributable to ***, which reallocated capacity to out-of-scope products produced on the same equipment and machinery used to produce in-scope CACCS.[6] The large decrease in production from 2022 to 2023 was mainly driven by *** whose production decreased from 2022 to 2023, then rebounded in 2024 to a level similar to that in 2022. Subject producers project capacity and production to increase by about *** from 2024 to 2025 and remain at somewhat similar levels in 2026.

Subject foreign producers' home market shipments decreased by over *** from 2022 to 2024 but were over *** in interim 2025 compared to interim 2024. Foreign producers project home market shipments to increase from 2024 to 2026. Meanwhile, exports to the United States decreased to their lowest level in 2023 but increased in 2024 to a level higher than that in 2022. Exports to the United States were lower in interim 2025 compared to interim 2024. Subject foreign producers project export shipments to the United States to decrease overall from 2024 to 2026. Throughout the period for which data were collected, exports to the United States accounted for the largest share of total shipments, reaching their highest share in 2024. Subject foreign producers project export shipments to the United States to continue to hold the largest share of total shipments in 2025 and 2026.

[6] ***. Email from ***, February 24, 2026.

Table 7.10 CACCS: Data on subject foreign industries, by item and period

Quantity in 1,000 pounds dry weight; interim period is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity	***	***	***	***	***	***	***
Production: Citric acid	***	***	***	***	***	***	***
Production: Sodium citrate	***	***	***	***	***	***	***
Production: Potassium citrate	***	***	***	***	***	***	***
Production: Crude calcium citrate	***	***	***	***	***	***	***
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 7.10 (Continued) CACCS: Data on subject foreign industries, by period

Ratio and share in percent; interim period is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity utilization ratio	***	***	***	***	***	***	***
Share of production: Citric acid	***	***	***	***	***	***	***
Share of production: Sodium citrate	***	***	***	***	***	***	***
Share of production: Potassium citrate	***	***	***	***	***	***	***
Share of production: Crude calcium citrate	***	***	***	***	***	***	***
Share of production	100.0	100.0	100.0	100.0	100.0	100.0	100.0
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 “—“.

Practical CACCS capacity and production by subject foreign industry

Table 7.11 presents information on subject producers' production, capacity, and capacity utilization by subject country. From 2022 to 2024, JBL's capacity was unchanged while its production dropped to its lowest level in 2023 and rebounded in 2024 to a level that was lower than that in 2022. JBL's production was lower in interim 2025 compared to interim 2024. Overall, from 2022 to 2024, the Indian industry's capacity and production decreased and was higher in interim 2025 compared to interim 2024. JBL projects capacity to be stable in 2025 and 2026, but projects an overall increase in production. Foreign producers in India project capacity to increase in 2025 and 2026, but they project a decrease in production.

Table 7.11 CACCS: Subject producers' output, by country and period

Practical capacity

Capacity in 1,000 pounds dry weight; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.11 (Continued) CACCS: Subject producers' output, by country and period

Production

Production in 1,000 pounds dry weight; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.11 (Continued) CACCS: Subject producers' output, by country and period

Capacity utilization

Capacity utilization in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

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

Table 7.11 (Continued) CACCS: Subject producers' output, by country and period

Share of production

Share in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Table 7.12 presents information on foreign industries' production of CACCS by type (citric acid, sodium citrate, potassium citrate, and crude calcium citrate) and tables 7.13 and 7.14 present additional information on the production and input source of these products.

Table 7.12 CACCS: Subject foreign industries' production by subject foreign industry, product type and period

Quantity in 1,000 pounds dry weight; shares in percent; interim period is January through September

Product type	Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Production: Citric acid	Canada	Quantity	***	***	***	***	***
Production: Sodium citrate	Canada	Quantity	***	***	***	***	***
Production: Potassium citrate	Canada	Quantity	***	***	***	***	***
Production: Crude calcium citrate	Canada	Quantity	***	***	***	***	***
Production	Canada	Quantity	***	***	***	***	***
Production: Citric acid	Canada	Share	***	***	***	***	***
Production: Sodium citrate	Canada	Share	***	***	***	***	***
Production: Potassium citrate	Canada	Share	***	***	***	***	***
Production: Crude calcium citrate	Canada	Share	***	***	***	***	***
Production	Canada	Share	100.0	100.0	100.0	100.0	100.0
Production: Citric acid	India	Quantity	***	***	***	***	***
Production: Sodium citrate	India	Quantity	***	***	***	***	***
Production: Potassium citrate	India	Quantity	***	***	***	***	***
Production: Crude calcium citrate	India	Quantity	***	***	***	***	***
Production	India	Quantity	***	***	***	***	***
Production: Citric acid	India	Share	***	***	***	***	***
Production: Sodium citrate	India	Share	***	***	***	***	***
Production: Potassium citrate	India	Share	***	***	***	***	***
Production: Crude calcium citrate	India	Share	***	***	***	***	***
Production	India	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 7.13 CACCS: Subject foreign industries' production of sodium citrate in 2024 by subject foreign industry, and source of its citric acid input

Quantity in 1,000 pounds dry weight; shares in percent; interim period is January through September

Source of input into production	Subject foreign industry	Quantity	Share
Using own acid production	Canada	***	***
Using other home market acid production	Canada	***	***
Using imported acid	Canada	***	***
Using all input sources	Canada	***	100.0
Using own acid production	India	***	***
Using other home market acid production	India	***	***
Using imported acid	India	***	***
Using all input sources	India	***	100.0
Using own acid production	Subject foreign industries	***	***
Using other home market acid production	Subject foreign industries	***	***
Using imported acid	Subject foreign industries	***	***
Using all input sources	Subject foreign industries	***	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 7.14 CACCS: Subject foreign industries' production of potassium citrate in 2024, by subject foreign industry and its source of acid input

Quantity in 1,000 pounds dry weight; shares in percent; interim period is January through September

Source of input into production	Subject foreign industry	Quantity	Share
Using own acid production	Canada	***	***
Using other home market acid production	Canada	***	***
Using imported acid	Canada	***	***
Using all input sources	Canada	***	100.0
Using own acid production	India	***	***
Using other home market acid production	India	***	***
Using imported acid	India	***	***
Using all input sources	India	***	100.0
Using own acid production	Subject foreign industries	***	***
Using other home market acid production	Subject foreign industries	***	***
Using imported acid	Subject foreign industries	***	***
Using all input sources	Subject foreign industries	***	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 "—".

JBL reported the production of in-scope citric acid, sodium citrate, and potassium citrate in Canada.[7] Additionally, it testified that "theoretically" (and with modifications) it could also produce crude calcium citrate.[8] Indian producers reported the production of citric acid, sodium citrate, potassium citrate, and crude calcium citrate. Three of the four responding Indian producers reported the production of citric acid: ***, ***, and ***.[9] Indian producer *** reported the production of ***.[10] *** reported that *** percent of its total CACCS production in 2024 was of citric acid, *** percent was of sodium citrate, *** percent was of potassium citrate, and *** percent was of crude calcium

[7] JBL reported that *** percent of its total CACCS production in 2024 was of citric acid, *** percent was of sodium citrate, and *** percent was of potassium citrate. It also reported that *** percent of its sodium citrate and potassium citrate was produced using its own firm's citric acid production. Conference transcript, p. 119 (Torres).

[8] Conference transcript, p. 119 (Torres).

[9] Although three firms reported the production of citric acid in India, only one firm (***) indicated that the fermentation stage was part of its production process.

[10] *** reported that *** percent of its potassium citrate is produced using imported citric acid and that it does not export the potassium citrate it produces, but ships all of its production to the commercial home market in India.

citrate.[11] *** reported that *** percent of its total CACCS production in India during all periods examined was of citric acid and that a large majority (*** percent) of its total shipments in 2024 were exports to the United States.[12] *** reported that *** percent of its total CACCS production in 2024 was of citric acid and *** percent was of sodium citrate.[13]

[11] *** reported that *** percent of its sodium citrate and *** percent of its potassium citrate was produced using citric acid produced by other producers in India and *** percent of its sodium citrate and *** percent of its potassium citrate was produced using imported citric acid. It did not report using its own citric acid production in its production of sodium citrate and potassium citrate. *** did not know the country of origin of its imported citric acid purchases, and it is unclear that the firms it identified as producers of citric acid in India from which it sources input for its sodium citrate and potassium citrate production are actual producers, as several appear to be distributors, traders, and importers. More than half (*** percent) of *** CACCS shipments in 2024 were exports to the United States.

*** reported that it developed the fermentation technology to produce citric acid from sugar using the *Aspergillus niger* mold in *** and started production of citric acid in ***. It indicated that all of its citric acid exported to the United States beginning in *** was made using this fermentation technology. ***, the firm employed the lime/sulphuric acid method using purchased dry, technical grade citric acid monohydrate ("CAM") from traders in India. *** described that production process as follows: "***." Emails from ***, February 19, 2026 and February 20, 2026.

[12] *** reports that the processing it performs does not involve the first stage of fermentation but instead uses citric acid anhydrous sourced from China as its raw material in its production process. It described its production process in India and finished product as follows: "***." Emails from ***, February 19, 2026 and February 20, 2026.

[13] *** reported that *** percent of its sodium citrate was produced using imported citric acid. Based on the company's "Process Flow Chart of Citric Acid Anhydrous," *** uses purchased citric acid monohydrate as the raw material and does not employ the first fermentation stage in its production process. The production steps performed by *** include the following: ***. Email from ***, February 24, 2026.

CACCS exports, by subject country

Table 7.15 presents information on subject producers' (and resellers) exports of CACCS by subject country. Overall, during 2022 to 2024, exports to the United States by foreign producers in Canadia and India increased. Exports to the United States by JBL were lower in interim 2025 compared to interim 2024, while exports to the United States by foreign producers in India experienced the opposite. Foreign producers in each subject country project exports to the United States to decrease from 2024 to 2026.

Table 7.15 CACCS: Subject producers' (and resellers') exports: Exports to the United States, by source and period

Exports to the United States

Quantity in 1,000 pounds dry weight; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.15 (Continued) CACCS: Subject producers' (and resellers') exports: Share of total shipments exported to the United States, by source and period

Share of total shipments exported to the United States

Share in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.15 (Continued) CACCS: Subject producers' (and resellers') exports: Exports to all destination markets, by source and period

Total exports

Quantity in 1,000 pounds dry weight; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.15 (Continued) CACCS: Subject producers' (and resellers') exports: Share of total shipments exported to all destinations, by source and period

Share of total shipments exported

Share in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

CACCS inventories, by subject foreign industry

Table 7.16 presents information on ending inventories of the responding producers by subject foreign country. Throughout the period for which data were collected, *** was responsible for a large majority of ending inventories held by the subject producers. Combined, foreign producers' ending inventories were highest in 2023 and ended 2024 with higher levels than in 2022. Foreign producers' ending inventories were lower in interim 2025 compared to interim 2024. Foreign producers project ending inventories to be at similar levels in 2025 and 2026 compared to 2024.

Table 7.16 CACCS: Subject foreign industries' ending inventories: Ending inventories, by source and period

Quantity in 1,000 pounds dry weight; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table 7.16 (Continued) CACCS: Subject foreign industries' ending inventories: Ratio of ending inventories to total shipments, by source and period

Ratio in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Canada	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Alternative products

As shown in table 7.17, responding firms produced other products on the same equipment and machinery used to produce CACCS. Three firms reported producing out-of-scope products on the same equipment and machinery used to produce in-scope products.[14] Out-of-scope production accounted for less than *** percent of all production on the same equipment machinery used to produce CACCS.

Table 7.17 CACCS: Subject foreign industries' overall production on the same equipment as in-scope production, by product type and period

Quantity in 1,000 pounds dry weight; share in percent

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
CACCS	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
CACCS	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.

Note: ***. Email from ***, February 24, 2026.

[14] Out-of-scope products include ***. ***s' foreign producer questionnaire response, section II-3a.

Exports

Table 7.18 presents various data sets for exports of CACCS from subject countries to the United States and to all destination markets. Exports of CACCS from Canada to the United States were lowest in 2023 and reached their highest level in 2024. While exports of CACCS from Canada to all destination markets were also lowest in 2023 and rebounded in 2024, they did not surpass their 2022 level. Exports of CACCS from India to the United States reached their highest level in 2023, then decreased slightly in 2024 but overall increased from 2022 to 2024. Exports of CACCS from India to all destination markets increased from 2022 to 2023 and remained at a similar level in 2024.

Exports of CACCS from Canada and India to the United States accounted for the majority share of their respective countries' total exports from 2022 to 2024. Exports of CACCS from Canada to the United States held an increasing share of Canadian exports from 2022 to 2024. Exports of CACCS from India to the United States as a share of total exports increased to their highest share in 2023 and overall increased from 2022 to 2024.

Table 7.18 (Continued) CACCS: Global exports from subject exporters: Exports to the United States, by exporter and period

Quantity in 1,000 pounds dry weight

Exporter	Measure	2022	2023	2024
Canada	Quantity	***	***	***
India	Quantity	21,314	36,198	31,162
Subject exporters	Quantity	***	***	***

Table continued.

Table 7.18 (Continued) CACCS: Global exports from subject exporters: Exports to all destination markets, by exporter and period

Quantity in 1,000 pounds dry weight

Exporter	Measure	2022	2023	2024
Canada	Quantity	***	***	***
India	Quantity	34,968	48,834	48,781
Subject exporters	Quantity	***	***	***

Table continued.

Table 7.18 (Continued) CACCS: Global exports from subject exporters: Exports to the United States, by exporter and period

Share in percent

Exporter	Measure	2022	2023	2024
Canada	Share	***	***	***
India	Share	61.0	74.1	63.9
Subject exporters	Share	***	***	***

Source: Official exports statistics and official global imports statistics from Canada (constructed exports) under HS subheadings 2918.14 and 2918.15 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed January 30, 2026. Canadian exports to the United States are based on proprietary, Census-edited Customs records for U.S. imports from Canada because data from Canada in the Global Trade Atlas Suite database has been suppressed.

Note: Shares represent the shares of value exported to the United States out of all destination markets. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. inventories of imported merchandise

Table 7.19 presents data on U.S. importers' reported inventories of CACCS. From 2022 to 2024, U.S. importers' inventories of CACCS from Canada fluctuated, declining from 2022 to 2023 but increasing in 2024 to a level higher than that in 2022. Meanwhile, U.S. importers' inventories of CACCS from Indian sources were highest in 2023 and were at similar levels in 2022 and 2024. U.S. importers' inventories of CACCS from nonsubject sources decreased from 2022 to 2023 and remained at similar levels in 2024. U.S. importers' inventories from Canada and India were higher in interim 2025 compared to interim 2024, whereas inventories of imports from nonsubject sources were lower.

U.S. importers' inventories from Canada as a ratio to imports remained below *** percent during all periods for which data were collected. U.S. importers' inventories from India as a ratio to imports were highest in 2022, then decreased in 2023 and 2024. U.S. importers' inventories from nonsubject sources as a ratio to imports increased slightly from 2022 to 2023, then decreased to their lowest level in 2024. U.S. importers' inventories from India and nonsubject sources as a ratio to imports were lower in interim 2025 compared to interim 2024.

Table 7.19 CACCS: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds dry weight; ratio in percent

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	Canada	***	***	***	***	***
Ratio to imports	Canada	***	***	***	***	***
Ratio to U.S. shipments of imports	Canada	***	***	***	***	***
Ratio to total shipments of imports	Canada	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***	***	***

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of CACCS from Canada and India after September 30, 2025. Their reported data are presented in table 7.20. Arranged imports from Canada accounted for a large majority of all arranged imports in the last quarter of 2025 and first quarter of 2026. Arranged imports from nonsubject sources accounted for the largest share of arranged imports in the second and third quarters of 2026.

Table 7.20 CACCS: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds dry weight

Source	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Total
Canada	***	***	***	***	***
India	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubect sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

There are no known trade remedy actions on CACCS from Canada or India in third-country markets.

Information on nonsubject countries

China accounted for approximately *** percent of global CACCS capacity and production and exported over *** percent of its production in 2024.[15] In table 7.21, China accounted for approximately *** percent of global exports in 2022, 2023, and 2024.

Table 7.21 CACCS: Global exports by exporter and period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars

Exporting country	Measure	2022	2023	2024
United States	Quantity	52,672	46,195	51,053
Canada	Quantity	***	***	***
India	Quantity	34,968	48,834	48,781
Subject exporters	Quantity	***	***	***
China	Quantity	3,288,346	3,200,543	3,449,389
Belgium	Quantity	257,894	163,440	237,726
Thailand	Quantity	177,831	248,204	232,106
Germany	Quantity	189,253	153,061	167,103
Netherlands	Quantity	102,522	100,734	99,290
Colombia	Quantity	59,929	67,173	70,846
Poland	Quantity	49,708	46,956	65,390
Turkey	Quantity	29,496	35,842	43,988
Ireland	Quantity	16,119	26,597	35,200
All other exporters	Quantity	***	***	***
All reporting exporters	Quantity	***	***	***
United States	Value	92,279	98,342	100,803
Canada	Value	***	***	***
India	Value	58,566	48,876	46,902
Subject exporters	Value	***	***	***
China	Value	2,470,396	1,266,132	1,127,161
Belgium	Value	297,785	149,375	164,550
Thailand	Value	200,077	205,698	168,682
Germany	Value	297,930	254,310	251,251
Netherlands	Value	141,012	86,871	81,843
Colombia	Value	60,564	65,993	63,063
Poland	Value	67,021	36,988	45,196
Turkey	Value	34,337	26,187	25,190
Ireland	Value	20,837	41,786	43,741
All other exporters	Value	***	***	***
All reporting exporters	Value	***	***	***

Table continued.

[15] Zeng et al., *Citric Acid*, S&P Global, *Chemical Economics Handbook*, June 2024, pp. 8 and 10.

Table 7.21 (Continued) CACCS: Global exports by exporter and period

Unit value in dollars per pound dry weight; shares in percent

Exporting country	Measure	2022	2023	2024
United States	Unit value	1.75	2.13	1.97
Canada	Unit value	***	***	***
India	Unit value	0.75	0.40	0.33
Subject exporters	Unit value	***	***	***
China	Unit value	1.15	0.91	0.69
Belgium	Unit value	1.67	1.00	0.96
Thailand	Unit value	1.13	0.83	0.73
Germany	Unit value	1.57	1.66	1.50
Netherlands	Unit value	1.38	0.86	0.82
Colombia	Unit value	1.01	0.98	0.89
Poland	Unit value	1.35	0.79	0.69
Turkey	Unit value	1.16	0.73	0.57
Ireland	Unit value	1.29	1.57	1.24
All other exporters	Unit value	***	***	***
All reporting exporters	Unit value	***	***	***
United States	Share of quantity	***	***	***
Canada	Share of quantity	***	***	***
India	Share of quantity	***	***	***
Subject exporters	Share of quantity	***	***	***
China	Share of quantity	***	***	***
Belgium	Share of quantity	***	***	***
Thailand	Share of quantity	***	***	***
Germany	Share of quantity	***	***	***
Netherlands	Share of quantity	***	***	***
Colombia	Share of quantity	***	***	***
Poland	Share of quantity	***	***	***
Turkey	Share of quantity	***	***	***
Ireland	Share of quantity	***	***	***
All other exporters	Share of quantity	***	***	***
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 2918.14 and 2918.15 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed January 30, 2026, adjusted to report for suppressed Canadian exports to the United States based on proprietary, Census-edited Customs records for U.S. imports from Canada (constructed exports) under HTS reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000.

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 data.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
91 FR 3221, January 26, 2026	Citric Acid and Certain Citrate Salts From Canada and India; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	https://www.govinfo.gov/content/pkg/FR-2026-01-26/pdf/2026-01404.pdf
91 FR 7252, February 17, 2026	Citric Acid and Certain Citrate Salts From Canada and India: Initiation of Less-Than-Fair-Value Investigations	https://www.govinfo.gov/content/pkg/FR-2026-02-17/pdf/2026-03061.pdf
91 FR 7257 February 17, 2026	Citric Acid and Certain Citrate Salts From Canada and India: Initiation of Countervailing Duty Investigations	https://www.govinfo.gov/content/pkg/FR-2026-02-17/pdf/2026-03060.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: Citric Acid and Certain Citrate Salts from Canada and India

Inv. Nos.: 701-TA-783-784 and 731-TA-1771-1772 (Preliminary)

Date and Time: February 11, 2026 – 9:30 a.m.

Sessions were held in connection with these preliminary phase investigations in Courtroom A, 500 E Street, SW., Washington, DC.

EMBASSY APPEARANCE:

Embassy of Canada
Washington, D.C.

Carlos Vanderloo, Minister-Counsellor

OPENING REMARKS:

In Support of Imposition (**Stephen P. Vaughn**, King & Spalding LLP)
In Opposition of Imposition (**Frederick P. Waite**, Vorys Sater Seymour & Pease LLP)

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

King & Spalding LLP
Washington, D.C.
on behalf of

Archer-Daniels-Midland Company ("ADM")
Cargill, Incorporated ("Cargill")
Primary Products Ingredients Americas LLC ("Primient")

Karis Butler, Product Manager, Acidulants & Dextrose, ADM

Jay Kroese, Senior Lawyer, Cargill

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

Chris Zeager, Product Line Manager for Acidulants, Primient

Stephen P. Vaughn)
Patrick J. McLain) – OF COUNSEL
Victor Leite)

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

Steptoe LLP
Washington, D.C.
on behalf of

Government of Canada

Mert Arkan) – OF COUNSEL

Vorys Sater Seymour & Pease LLP
Washington, D.C.
on behalf of

Jungbunzlauer Canada Inc.

Dan Rainville, President/General Manager, Jungbunzlauer Inc.

Carlos Torres, Vice-President Sales, Americas

Rebecca L. Woodings, International Trade Consultant

Frederick P. Waite)
) – OF COUNSEL
Kimberly R. Young)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Stephen P. Vaughn**, King & Spalding LLP)
In Opposition of Imposition (**Frederick P. Waite**, Vorys Sater Seymour & Pease LLP and **Rebecca L. Woodings**, International Trade Consultant)

APPENDIX C

SUMMARY DATA

Table C.1
CACCS: Summary data concerning the U.S. market, by item and period
Quantity=1,000 pounds dry weight; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound dry weight; Period changes=percent--exceptions noted; Interim period is January through September

	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	***	***	***	***	***	▲***	▼***	▲***	▼***
India	***	***	***	***	***	▲***	▲***	▼***	▲***
Subject sources	***	***	***	***	***	▲***	▼***	▲***	▼***
Thailand	***	***	***	***	***	▲***	▲***	▼***	▲***
All other sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▼***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Canada	***	***	***	***	***	▲***	▲***	▲***	▼***
India	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
Thailand	***	***	***	***	***	▼***	▼***	▼***	▲***
All other sources	***	***	***	***	***	▼***	▼***	▲***	▼***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. imports from:									
Canada:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
India:									
Quantity	21,231	34,086	27,633	20,611	35,573	▲30.2	▲60.5	▼(18.9)	▲72.6
Value	40,906	33,208	24,532	18,436	29,217	▼(40.0)	▼(18.8)	▼(26.1)	▲58.5
Unit value	$1.93	$0.97	$0.89	$0.89	$0.82	▼(53.9)	▼(49.4)	▼(8.9)	▼(8.2)
Ending inventory quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Thailand:									
Quantity	133,588	176,640	181,559	138,373	171,993	▲35.9	▲32.2	▲2.8	▲24.3
Value	203,451	182,496	155,396	114,218	129,878	▼(23.6)	▼(10.3)	▼(14.8)	▲13.7
Unit value	$1.52	$1.03	$0.86	$0.83	$0.76	▼(43.8)	▼(32.2)	▼(17.2)	▼(8.5)
All other sources:									
Quantity	165,500	151,230	164,543	117,472	125,285	▼(0.6)	▼(8.6)	▲8.8	▲6.7
Value	252,684	220,955	195,406	148,149	139,321	▼(22.7)	▼(12.6)	▼(11.6)	▼(6.0)
Unit value	$1.53	$1.46	$1.19	$1.26	$1.11	▼(22.2)	▼(4.3)	▼(18.7)	▼(11.8)
Nonsubject sources:									
Quantity	299,088	327,869	346,102	255,845	297,277	▲15.7	▲9.6	▲5.6	▲16.2
Value	456,135	403,451	350,803	262,367	269,198	▼(23.1)	▼(11.6)	▼(13.0)	▲2.6
Unit value	$1.53	$1.23	$1.01	$1.03	$0.91	▼(33.5)	▼(19.3)	▼(17.6)	▼(11.7)
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▼***

Table continued.

Table C.1 Continued
CACCS: Summary data concerning the U.S. market, by item and period

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

Item	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. producers':									
Practical capacity quantity	492,991	471,378	429,161	310,536	351,606	▼(12.9)	▼(4.4)	▼(9.0)	▲13.2
Production quantity	450,413	371,659	364,408	256,962	286,481	▼(19.1)	▼(17.5)	▼(2.0)	▲11.5
Capacity utilization (fn1)	91.4	78.8	84.9	82.7	81.5	▼(6.5)	▼(12.5)	▲6.1	▼(1.3)
U.S. shipments:									
Quantity	439,791	361,502	327,784	252,842	263,737	▼(25.5)	▼(17.8)	▼(9.3)	▲4.3
Value	519,591	452,832	335,406	256,337	253,089	▼(35.4)	▼(12.8)	▼(25.9)	▼(1.3)
Unit value	$1.18	$1.25	$1.02	$1.01	$0.96	▼(13.4)	▲6.0	▼(18.3)	▼(5.3)
Export shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity	39,559	44,560	76,186	44,580	95,621	▲92.6	▲12.6	▲71.0	▲114.5
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▲***	▲***	▲***
Production workers	340	354	354	354	363	▲4.1	▲4.1	—	▲2.5
Hours worked (1,000s)	575	610	622	485	473	▲8.2	▲6.1	▲2.0	▼(2.5)
Wages paid ($1,000)	28,092	30,848	32,739	25,741	25,596	▲16.5	▲9.8	▲6.1	▼(0.6)
Hourly wages (dollars per hour)	$48.86	$50.57	$52.64	$53.07	$54.11	▲7.7	▲3.5	▲4.1	▲2.0
Productivity (pounds dry weight per hour)	783.3	609.3	585.9	529.8	605.7	▼(25.2)	▼(22.2)	▼(3.8)	▲14.3
Unit labor costs	$0.06	$0.08	$0.09	$0.10	$0.09	▲44.0	▲33.1	▲8.2	▼(10.8)
Net sales:									
Quantity	446,632	366,658	332,782	256,942	267,046	▼(25.5)	▼(17.9)	▼(9.2)	▲3.9
Value	532,343	460,464	340,571	260,356	254,832	▼(36.0)	▼(13.5)	▼(26.0)	▼(2.1)
Unit value	$1.19	$1.26	$1.02	$1.01	$0.95	▼(14.1)	▲5.4	▼(18.5)	▼(5.8)
Cost of goods sold (COGS)	320,234	345,091	341,328	259,453	261,112	▲6.6	▲7.8	▼(1.1)	▲0.6
Gross profit or (loss) (fn2)	212,109	115,373	(757)	903	(6,280)	▼***	▼(45.6)	▼***	▼***
SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS	$0.72	$0.94	$1.03	$1.01	$0.98	▲43.1	▲31.3	▲9.0	▼(3.2)
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1)	60.2	74.9	100.2	99.7	102.5	▲40.1	▲14.8	▲25.3	▲2.8
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses	***	***	***	***	***	▲***	▲***	▼***	▲***
Total assets	324,824	345,662	388,475	***	***	▲19.6	▲6.4	▲12.4	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2918.14.0000, 2918.15.1000 and 2918.15.5000, accessed January 27, 2026, except data for Canada which are based on proprietary, Census-edited Customs records under the same HTS statistical reporting numbers due to suppression in the public import statistics. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. 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.

APPENDIX D

U.S. SHIPMENTS AND U.S. IMPORTS BY TYPE

Table D.1: CACCS: U.S. producers' U.S. shipments in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	***
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	***

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

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

Table D.2: CACCS: U.S. importers' U.S. imports from Canada in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	***
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	***

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

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

Table D.3: CACCS: U.S. importers' U.S. imports from India in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All non-GMO certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	100.0
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	100.0

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

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

Table D.4: CACCS: U.S. importers' U.S. imports from subject sources in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All non-GMO certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	***
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	***

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

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

Table D.5: CACCS: U.S. importers' U.S. imports from nonsubject sources in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All non-GMO certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	***
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	***

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

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

Table D.6: CACCS: U.S. importers' U.S. imports from all sources in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All non-GMO certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	***
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	***

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

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

Table D.7 CACCS: U.S. producers' U.S. shipments and U.S. importers' U.S. imports in 2024, by product type and by Non-GMO certification status

Quantity in 1,000 pounds dry weight; Value in 1,000 dollars; Unit values in dollars per pound dry weight; Shares down and across in percent

Product type	Measure	Non-GMO Project verified	Other non-GMO certified	Other (e.g., GMO)	All non-GMO certification statuses
Citric acid	Quantity	***	***	***	***
Sodium citrate	Quantity	***	***	***	***
Potassium citrate	Quantity	***	***	***	***
Crude calcium citrate	Quantity	***	***	***	***
All product types	Quantity	***	***	***	***
Citric acid	Value	***	***	***	***
Sodium citrate	Value	***	***	***	***
Potassium citrate	Value	***	***	***	***
Crude calcium citrate	Value	***	***	***	***
All product types	Value	***	***	***	***
Citric acid	Unit value	***	***	***	***
Sodium citrate	Unit value	***	***	***	***
Potassium citrate	Unit value	***	***	***	***
Crude calcium citrate	Unit value	***	***	***	***
All product types	Unit value	***	***	***	***
Citric acid	Share of quantity	***	***	***	***
Sodium citrate	Share of quantity	***	***	***	***
Potassium citrate	Share of quantity	***	***	***	***
Crude calcium citrate	Share of quantity	***	***	***	***
All product types	Share of quantity	***	***	***	***
Citric acid	Share of value	***	***	***	***
Sodium citrate	Share of value	***	***	***	***
Potassium citrate	Share of value	***	***	***	***
Crude calcium citrate	Share of value	***	***	***	***
All product types	Share of value	***	***	***	***

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 “—“.