

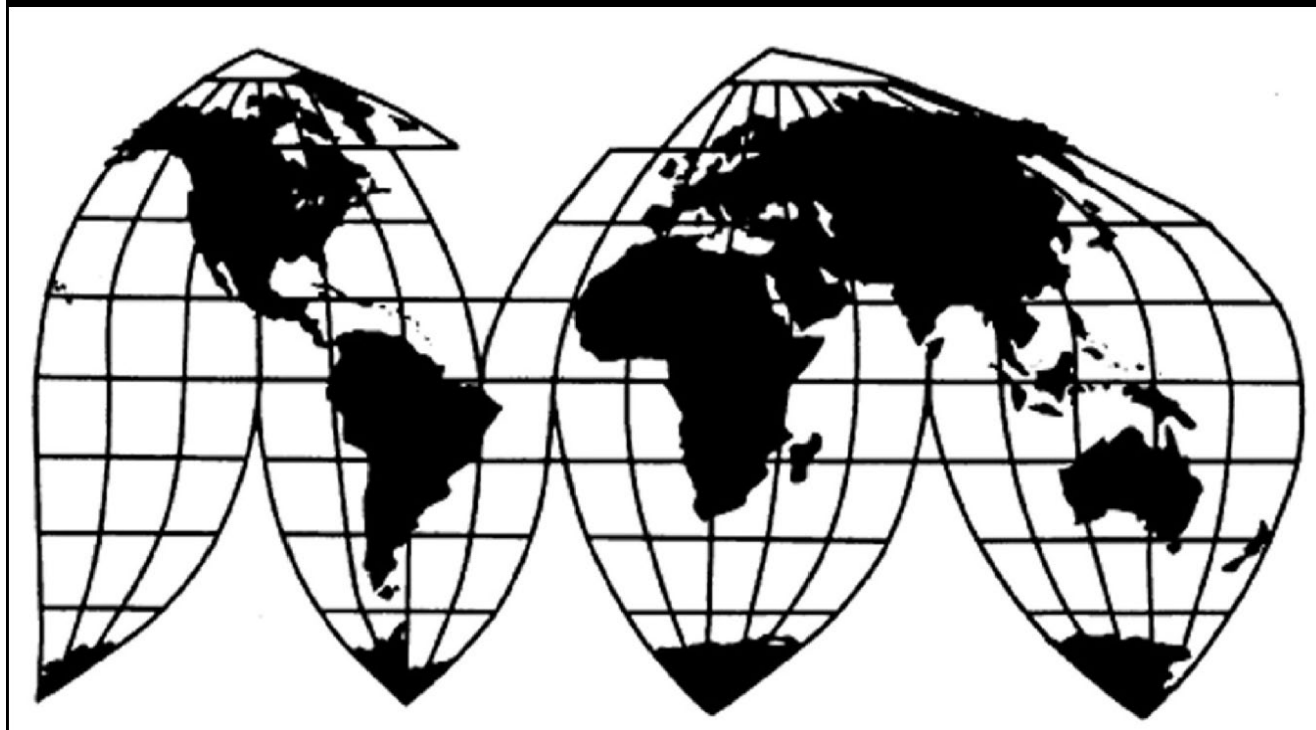
Citric Acid and Certain Citrate Salts from China

Investigation Nos. 701-TA-456 and 731-TA-1152 (Third Review)

Publication 5740

May 2026

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

COMMISSIONERS

Amy A. Karpel, Chair
David S. Johanson
Jason E. Kearns

Catherine DeFilippo
Director of Operations

Staff assigned

Alec Resch, Investigator
Jeffrey Clark, Industry Analyst
James Horne, Economist
Lane Hurewitz, Attorney
Lawrence Jones, Supervisory Investigator

Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

Citric Acid and Certain Citrate Salts from China

Investigation Nos. 701-TA-456 and 731-TA-1152 (Third Review)

Publication 5740



May 2026

CONTENTS

	Page
Determinations	1
Views of the Commission.....	3
Information obtained in these reviews	1.1
Background	1.1
The original investigations	1.2
The first five-year reviews.....	1.3
The second five-year reviews.....	1.3
Previous and related investigations.....	1.4
Commerce's five-year reviews.....	1.4
The product.....	1.6
Commerce's scope	1.6
U.S. tariff treatment.....	1.7
Description and uses.....	1.10
Manufacturing process	1.13
The industry in the United States	1.15
U.S. producers.....	1.15
Recent developments	1.15
U.S. producers' trade and financial data	1.16
Definitions of the domestic like product and domestic industry	1.17
U.S. importers	1.18
U.S. imports.....	1.19
Apparent U.S. consumption and market shares	1.20
The industry in China	1.21
Producers in China	1.21
Recent developments	1.22
Exports	1.23
Third-country trade actions	1.24
The global market	1.26

Appendixes

	Page
A. <i>Federal Register</i> notices	A.1
B. Responses to the notice of institution	B.1
C. Summary data compiled in prior proceedings	C.1
D. Purchaser questionnaire responses	D.1

Note.—Information that would reveal confidential operations of individual firms may not be published.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-456 and 731-TA-1152 (Third Review)

Citric acid and certain citrate salts from China

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing and antidumping duty orders on citric acid and certain citrate salts from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on December 1, 2025 (90 FR 55172) and determined on March 6, 2026, that it would conduct expedited reviews (91 FR 14712, March 26, 2026).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping and countervailing duty orders on citric acid and certain citrate salts (“CACCS”) from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

A. The Prior Proceedings

This is the third five-year review of the antidumping and countervailing duty orders on CACCS from China.¹

In response to petitions filed on April 14, 2008,² by Archer Daniels Midland Company (“ADM”), Cargill, Inc. (“Cargill”), and Tate & Lyle Americas, Inc. (“Tate & Lyle”), domestic producers of CACCS, the Commission determined in May 2009 that the domestic industry was materially injured by reason of less-than-fair-value (“LTFV”) imports of CACCS from Canada and China and imports of CACCS from China found to be subsidized by the Government of China.³ Subsequently, in May 2009 the U.S. Department of Commerce (“Commerce”) issued antidumping duty orders on imports of CACCS from Canada and China, and a countervailing duty order on imports of CACCS from China.⁴ In the full first reviews, the Commission determined in June 2015 that revocation of the antidumping duty orders on Canada and China, as well as the countervailing duty order on China, would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time, and Commerce issued a continuation of the orders.⁵ In the expedited second

¹ See *Citric Acid and Certain Citrate Salts from China; Institution of a Five-Year Reviews*, 90 Fed. Reg. 55,172 (Dec. 1, 2025) (“Notice of Institution”).

² *Citric Acid and Certain Citrate Salts from Canada and China*, Inv. Nos. 701-TA-456 and 731-TA-1151-1152 (Final), USITC Pub. 4076 (May 2009) (“*Original Investigations*,” USITC Pub. 4076”) at I-1; Petitions, EDIS Doc. 297330 (Apr. 14, 2008).

³ *Original Investigations*, USITC Pub. 4076 at 1, 37. Three Commissioners found that an industry in the United States was not materially injured or threatened with material injury by reason of such imports. *Original Investigations*, USITC Pub. 4076 at 39, 50.

⁴ *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 the People’s Republic of China: Notice of Countervailing Duty Order*, 74 Fed. Reg. 25705 (May 29, 2009).

⁵ *Citric Acid and Certain Citrate Salts from Canada and China*, Inv. Nos. 701-TA-456 and 731-TA-1151-1152 (Review), USITC Pub. 4538 (June 2015) (“*First Reviews*,” USITC Pub. 4538”) at 3, 38; *Citric Acid*

reviews, the Commission determined in December 2020 that revocation of the antidumping and countervailing duty orders on China would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time, and Commerce issued a continuation of these orders.⁶ Commerce revoked the antidumping duty order on CACCS from Canada after the domestic producers withdrew their intent to participate in the second five-year sunset review.⁷

B. The Current Reviews

In December 2025, the Commission instituted these five-year reviews.⁸ ADM, Cargill, and Primary Products Ingredients Americas LLC (“Primient”), U.S. producers of CACCS (the “domestic producers”), submitted a joint response to the notice of institution.⁹ The Commission did not receive a response to the notice of institution from any respondent interested party.¹⁰ On March 6, 2026, the Commission determined that the domestic interested party group response was adequate and that the respondent interested party group response was inadequate.¹¹ Finding no other circumstances that would warrant conducting a full review, the Commission determined that it would conduct an expedited review pursuant to section 751(c)(3) of the Tariff Act.¹² The Domestic Producers filed comments with the

and Certain Citrate Salts from Canada and the People’s Republic of China: Continuation of Antidumping Duty Orders, and Continuation of the Countervailing Duty Order on the People’s Republic of China, 80 Fed. Reg. 36,318 (June 24, 2015).

⁶ *Citric Acid and Certain Citrate Salts from China*, Inv. Nos. 701-TA-456 and 731-TA-1152 (Review), USITC Pub. 5147 (Dec. 2020) (“*Second Reviews*, USITC Pub. 5147”) at 3, 25; *Citric Acid and Certain Citrate Salts from the People’s Republic of China: Continuation of Antidumping Duty and Countervailing Duty Orders*, 86 Fed. Reg. 72 (Jan. 4, 2021).

⁷ *Second Reviews*, USITC Pub. 5147 at 4. Consequently, the Commission terminated its review of the antidumping duty order on CACCS from Canada. *Id.*; *Citric Acid and Certain Citrate Salts from Canada; Termination of Five-Year Review*, 85 Fed. Reg. 44546 (July 23, 2020).

⁸ *Citric Acid and Certain Citrate Salts from China: Institution of Five-Year Review*, 90 Fed. Reg. 55172 (Dec. 1, 2025) (“Notice of Institution”).

⁹ Confidential Report, INV-YY-027 (Feb. 23, 2026) (“CR”); *Citric Acid and Certain Citrate Salts from China from China*, Inv. Nos. 701-TA-456 and 731-TA-1152 (Third Review), USITC Pub. ____ (May 2026) (“PR”) (Collectively “CR/PR”) at 1.15, B.3—B.4, Table B.1, Response of the Domestic Industry to the Notice of Institution, EDIS Doc. 867265 (Dec. 23, 2025) (“Domestic Producers’ NOI Response”) at 1.

¹⁰ CR/PR at 1.21, B.3; *see also* Domestic Producers’ Comments Regarding Adequacy of Responses and Expedited Review, EDIS Doc. 872450 (Feb. 12, 2026) (“Adequacy Comments”) at 3.

¹¹ *Citric Acid and Certain Citrate Salts from China; Scheduling of Expedited Five-Year Reviews*, 91 Fed. Reg. 14,712 (March 26, 2026); *Explanation of Commission Determination on Adequacy*, EDIS Doc. 875767 (Mar. 18, 2026) (“Commission’s Adequacy Explanation”) at 1.

¹² *Citric Acid and Certain Citrate Salts from China; Scheduling of Expedited Five-Year Reviews*, 91 Fed. Reg. 14,712 (March 26, 2026); Commission’s Adequacy Explanation at 1.

Commission pursuant to 19 C.F.R. § 207.61(d) regarding the determination that the Commission should reach.¹³

U.S. industry data in these reviews are based on information supplied by the domestic producers in their response to the notice of institution, and information from the original investigations and prior reviews.¹⁴ The Domestic Producers indicated they were the only known U.S. producers of CACCS during 2024.¹⁵ U.S. import data and related information are based on Commerce’s official import statistics, Census-edited Customs records, and information from the original investigations and prior reviews.¹⁶ Foreign industry data and related information are based on information from the original investigations and prior reviews, information submitted by the domestic producers in these expedited reviews, and publicly available information compiled by the Commission.¹⁷

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”¹⁸ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and

¹³ Adequacy Comments at 2-3, 7-8; Domestic Producers’ Final Comments, EDIS Doc. 880425 (Apr. 28, 2026) (“Final Comments”) at 1; *see also* CR/PR at B.4 & nn.3-4; Domestic Producers’ NOI Response at 1.

¹⁴ CR/PR at 1.15—1.16, B.3, Tables 1.4, 1.5 & B.1; Domestic Producers’ NOI Response at 1-39.

¹⁵ CR/PR at 1.15, B.3, Table B.1; *see also* Domestic Producers’ NOI Response at 37.

¹⁶ *See* CR/PR at 1.19—1.20, Tables 1.6 & 1.7. Import data for subject imports from China and nonsubject countries are compiled from official Commerce statistics for Harmonized Tariff Schedule of the United States (“HTSUS”) statistical reporting numbers 2918.14.0000, 2918.15.1000, and 2918.15.5000. *Id.* at 1.19, Tables 1.6 & 1.7, source. The Commission also compiled import data for subject imports from China and nonsubject imports using official Commerce import data during the prior proceedings. *Original Investigations*, USITC Pub. 4076 at 4, I-4; CR/PR at Table 1.6. Import data for subject imports from Canada are compiled using Census-edited Customs records. *Id.* at Table 1.6, source. The Commission utilized questionnaire responses to compile subject imports from Canada during the original investigations. *Original Investigations*, USITC Pub. 4076 at 4, I-4.

HTSUS statistical reporting number 3824.90.9290, now decommissioned, was used in obtaining U.S. import statistics during the previous proceedings. *Id.* at 1.19, Table 1.6 note; *Original Investigations*, USITC Pub. 4076 at 4, I-4. The number’s successor, statistical reporting number 3924.99.9397 was not used to compile import data given that it refers to crude calcium citrate and blends containing other subject product, under which only negligible amounts of subject merchandise are likely to be imported. CR/PR at 1.19.

¹⁷ *See* CR/PR at 1.21 to 1.23, Tables 1.8-1.9.

¹⁸ 19 U.S.C. § 1677(4)(A).

uses with, the article subject to an investigation under this subtitle.”¹⁹ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²⁰

Commerce has defined the imported merchandise within the scope of the orders under review as follows:

The scope of this *Order* 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 of this *Order* 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 of this *Order* 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 2 percent, by weight, of the product. The scope of this *Order* 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. 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 3824.90.9290 of the HTSUS,

¹⁹ 19 U.S.C. § 1677(10); 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); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

²⁰ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

respectively. Blends that include citric acid, sodium citrate, and potassium citrate are classifiable under 3824.90.9290 of the HTSUS. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise is dispositive.²¹

The scope of the orders has not changed since the original investigations.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 metal cleaners, and in textile finishing treatments and other industrial applications.²³

In its original investigations, the Commission defined a single domestic like product of citric acid (whether in crude form as calcium citrate or in finished form), sodium citrate, and potassium citrate in all chemical and physical forms and grades.²⁴ In the prior five-year reviews, the Commission defined the domestic like product the same as in the original investigations.²⁵

In the current reviews, the domestic producers assert that the Commission should again define the domestic like product as it did in the prior proceedings.²⁶ The record does not contain any new information suggesting that the pertinent product characteristics and uses of CACCS have changed since the prior proceedings.²⁷ Accordingly, we again define a single domestic like product consisting of citric acid (whether in crude form as calcium citrate or in finished form), sodium citrate, and potassium citrate in all chemical and physical forms and grades.

²¹ *Citric Acid and Certain Citrate Salts from China: Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order*, 91 Fed. Reg. 20093 (Apr. 15, 2026) (signed Apr. 10, 2026) (“Commerce’s Third Five-Year Review Final Results – CACCS Antidumping Duty Order”) and accompanying Issues and Decision Memorandum, Case No. A-570-937 (Apr. 10, 2026) (“AD IDM”) at 2-3; *see also Citric Acid and Certain Citrate Salts from China: Final Results of the Expedited Third Sunset Review of the Countervailing Duty Order*, 91 Fed. Reg. 20105 (Apr. 15, 2026) (signed Apr. 10, 2026) (“Commerce’s Third Five-Year Review Final Results – CACCS Countervailing Duty Order”) and accompanying Issues and Decision Memorandum, Case No. C-570-938 (Apr. 10, 2026) (“CVD IDM”) at 2.

²² *Original Investigations*, USITC Pub. 4076 at 5; *First Reviews*, USITC Pub. 4538 at 5; *Second Reviews*, USITC Pub. 5147 at 6.

²³ CR/PR at 1.10—1.12; *see also Second Reviews*, USITC Pub. 5147 at 6.

²⁴ *Original Investigations*, USITC Pub. 4076 at 9.

²⁵ *First Reviews*, USITC Pub. 4538 at 6; *Second Reviews*, USITC Pub. 5147 at 7.

²⁶ *See, e.g.*, Domestic Producers’ NOI Response at 39.

²⁷ CR/PR at 1.6, 1.10—1.14.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry 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.”²⁸ 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.

In the original determinations and prior five-year reviews, the Commission defined the domestic industry as consisting of all domestic producers of citric acid and citrate salts.²⁹ In these current reviews, the Domestic Producers contend that the Commission should adopt the domestic industry definition from the prior proceedings.³⁰ The record in these reviews does not indicate that there are related party issues.³¹

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

III. Revocation of the Antidumping Duty and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”³² The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the

²⁸ 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

²⁹ *Original Investigations*, USITC Pub. 4076 at 9; *First Reviews*, USITC Pub. 4538 at 7; *Second Reviews*, USITC Pub. 5147 at 8.

³⁰ Domestic Producers’ NOI Response at 39.

³¹ *See generally* Domestic Producers’ NOI Response at 12, 39.

³² 19 U.S.C. § 1675a(a).

elimination of its restraining effects on volumes and prices of imports.”³³ Thus, the likelihood standard is prospective in nature.³⁴ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.³⁵

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”³⁶ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”³⁷

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”³⁸ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or

³³ SAA at 883-84. The SAA states that “[t]he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

³⁴ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

³⁵ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

³⁶ 19 U.S.C. § 1675a(a)(5).

³⁷ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

³⁸ 19 U.S.C. § 1675a(a)(1).

the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).³⁹ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.⁴⁰

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.⁴¹ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) 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.⁴²

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.⁴³

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the

³⁹ 19 U.S.C. § 1675a(a)(1). Commerce has made no duty absorption finding concerning CACCS from China in the current reviews. *Commerce's Third Five-Year Review Final Results – CACCS Antidumping Duty Order*, 91 Fed. Reg. at 20094 and accompanying AD IDM at 1; *Commerce's Third Five-Year Review Final Results – CACCS Countervailing Duty Order*, 91 Fed. Reg. at 20106 and accompanying CVD IDM at 1. See generally Domestic Producers' NOI Response at 1-39.

⁴⁰ 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

⁴¹ 19 U.S.C. § 1675a(a)(2).

⁴² 19 U.S.C. § 1675a(a)(2)(A-D).

⁴³ See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁴⁴ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.⁴⁵

As noted, the Commission did not receive a response to the notice of institution from any respondent party that imported the subject merchandise from China.⁴⁶ The record, therefore, contains limited new information with respect to the CACCS industry in China. There also is limited information on the CACCS market in the United States during the 2020-2024 period of review (“POR”). Accordingly, for our determination, we rely as appropriate on the facts available from the original investigations and prior reviews, and the limited new information on the record in these reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁴⁷ We have considered our findings regarding the conditions of competition in the original investigations and subsequent reviews.⁴⁸ The following conditions of competition inform our determinations in these reviews.

⁴⁴ 19 U.S.C. § 1675a(a)(4).

⁴⁵ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

⁴⁶ Commission’s Adequacy Explanation at 1; Adequacy Comments at 3.

⁴⁷ 19 U.S.C. § 1675a(a)(4).

⁴⁸ *Original Investigations*, USITC Pub. 4076 at 19-23; *First Reviews*, USITC Pub. 4538 at 21-27; *Second Reviews*, USITC Pub. 5147 at 11-16.

i. Demand

The information available in these reviews indicate that demand for CACCS continues to be derived from the demand for the downstream products that require CACCS including a wide variety of foods, beverages, pharmaceuticals, and cosmetics; commercial and household products, such as detergents and metal cleaners; and in textile finishing treatments and other industrial applications.⁴⁹ Purchaser responses regarding demand during the period of review were mixed.⁵⁰

Apparent U.S. consumption of CACCS has fluctuated upward since the original investigations; it initially decreased from *** pounds in 2008 to *** pounds in 2013, and then increased to *** pounds in 2019 and *** pounds in 2024, which was the highest level of consumption over these proceedings.⁵¹

ii. Supply

Domestically produced CACCS was the second largest source of CACCS in the U.S. market in 2024, accounting for *** percent of apparent U.S. consumption.⁵² In April 2022, Primient acquired U.S. producer Tate & Lyle, Inc.'s citric acid plant.⁵³

Subject imports were the smallest source of CACCS in the U.S. market in 2024, accounting for approximately *** percent of apparent U.S. consumption.⁵⁴ Nonsubject imports were the largest source of CACCS in the U.S. market in 2024, accounting for *** percent of apparent U.S. consumption.⁵⁵

⁴⁹ CR/PR at 1.11; Domestic Producers' NOI Response at 16-17.

⁵⁰ Purchasers *** reported that there were ***. CR/PR at D.3. In contrast, purchaser *** reported that in 2025 there was a ***. *Id.*

⁵¹ CR/PR at 1.20, Table 1.7. Apparent U.S. consumption increased *** percent from 2008 to 2024; it increased *** percent from 2019 to 2024. CR/PR at 1.20, Table 1.7.

⁵² CR/PR at 1.20, Table 1.7. The domestic industry's market share fluctuated downward since the original investigations; it increased from *** percent in 2008 to *** percent in 2013, and then declined to *** percent in 2019 and *** percent in 2024. CR/PR at 1.20, Table 1.7.

⁵³ CR/PR at 1.15, Table 1.4.

⁵⁴ CR/PR at Table 1.7.

⁵⁵ CR/PR at Table 1.7. The largest sources of nonsubject imports were *** and Thailand in 2024. *Id.* at Table 1.6. Nonsubject imports accounted for *** percent of apparent U.S. consumption in 2013 and *** percent in 2019. *Id.* We also note that the Commission recently issued affirmative preliminary determinations in the related investigations on citric acid and certain citrate salts from Canada and India. *See Citric Acid and Certain Citrate Salts from Canada and India*, Inv. Nos. 701-TA-783-784 and 731-TA-1771-1772 (Prelim.), USITC Pub. 5176 (Mar. 2026) at 1.

iii. Substitutability and Other Conditions

In the original investigations, the Commission observed that CACCS are commodities and the price was an important consideration in purchasing decisions, in addition to quality and availability.⁵⁶ It also observed that questionnaire respondents generally reported that imports from each subject source were substitutable for one another and for the domestic like product.⁵⁷ In the full first reviews, the Commission found that price was a very important factor in purchasing decisions and there was a moderate to high degree of substitutability between the domestic like product and subject imports.⁵⁸ It found that most purchasers reported that price was an important factor in purchasing decisions, and that purchasers listed price as one of the three most important factors in their purchasing decisions.⁵⁹ Similarly, in the expedited second reviews, the Commission found that there was a moderate-to-high degree of substitutability between domestically produced citric acid and the subject imports, and that price was an important factor in purchasing decisions for citric acid.⁶⁰

The record of these reviews contains no new information indicating that the degree of substitutability between the domestic like product and subject imports or the importance of price has changed since the prior proceedings.⁶¹ The Domestic Producers contend that the findings of the Commission in the original investigations and prior reviews are applicable in these reviews.⁶² They assert that the U.S. market for CACCS remains highly competitive and price sensitive.⁶³ The Domestic Producers contend that there continues to be a strong degree

⁵⁶ *Original Investigations*, USITC Pub. 4076 at 25-26. The Commission discussed substitutability, important purchasing factors, and CACCS as commodities in the context of its price effects analysis rather than in its discussion of the conditions of competition. *See id.*

⁵⁷ *Original Investigations*, USITC Pub. 4076 at 25-26.

⁵⁸ *First Reviews*, USITC Pub. 4538 at 26. In the first reviews, the Commission also noted that U.S. producers primarily sold CACCS through contracts while importers of the subject merchandise primarily sold on the spot market. *Id.*

⁵⁹ *First Reviews*, USITC Pub. 4538 at 26; Domestic Producers' NOI Response at 19; *see* Final Comments at 5-6.

⁶⁰ *Second Reviews*, USITC Pub. 5147 at 15-16; Domestic Producers' NOI Response at 19. In the second reviews, the domestic producers noted that a relatively small number of large purchasers continued to account for a large portion of sales in the U.S. market. *Second Reviews*, USITC Pub. 5147 at 15-16. The Commission noted that U.S. producers sell citric acid primarily on a contract basis, but purchasers reportedly sought price concessions during the term of the contracts. *Id.* at 16.

⁶¹ *See generally* CR/PR; Domestic Producers' NOI Response at 19-20; Final Comments at 9-10.

⁶² Domestic Producers' NOI Response at 19-20; *see* Final Comments at 8-10.

⁶³ Domestic Producers' NOI Response at 19-20; Final Comments at 9-10.

of substitutability between the domestic like product and the subject imports, and that price continues to be a critical factor in purchasing decisions in the U.S. market.⁶⁴

Based on the limited information on the record, we continue to find that there is a moderate-to-high degree of substitutability between domestically produced citric acid and subject imports, and that price is an important factor in purchasing decisions for citric acid.

CACCS originating in China continues to be subject to an additional 25 percent *ad valorem* duty under section 301 of the Trade Act of 1974, which became effective during the second five-year reviews.⁶⁵ Effective February 4, 2025, CACCS originating in China were subject to multiple additional duties under the International Emergency Economic Powers Act (“IEEPA”), with these multiple duties resulting in aggregate rates under a “stacking provision” for imports from China.⁶⁶ As of February 20, 2026, all tariffs initiated under IEEPA and the associated duties are no longer effective.⁶⁷ Effective February 24, 2026, subject imports from China became subject to additional 10 percent *ad valorem* duties under section 122 of the Trade Act of 1974, which, along with the 25 percent *ad valorem* duty under section 301 of the Trade Act of 1974, results in an aggregate rate under a “stacking provision” for imports from China.⁶⁸

C. Likely Volume of Subject Imports

We have considered our findings regarding the volume of subject imports in the original investigations, and likely volume of subject imports in subsequent reviews.⁶⁹ In the current reviews, the information indicates that the discipline of the orders continued to have a restraining effect on subject import volumes, which continued to be far smaller than the

⁶⁴ Domestic Producers’ NOI Response at 19-20; *see also* Final Comments at 9-10.

⁶⁵ CR/PR at 1.7, 1.10, Table 1.3. From September 24, 2018, until May 10, 2019, CACCS originating in China was subject to an additional 10 percent *ad valorem* duty under section 301 of the Trade Act of 1974. *Id.* at 1.7.

⁶⁶ *See* CR/PR at 1.8-1.9, Table 1.3.

⁶⁷ CR/PR at 1.8—1.9; *see Ending Certain Tariff Actions*, 91 Fed. Reg. 9437 (Feb. 25, 2026) (Executive Order 14389 of Feb. 20, 2026).

⁶⁸ CR/PR at 1.7; *Imposing a Temporary Surcharge to Address Fundamental International Payment Problems*, 91 Fed. Reg. 9339 (Feb. 25, 2026) (Presidential Proclamation 11012 of Feb. 20, 2026). Section 122 of the Trade Act of 1974 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. *Id.*

⁶⁹ *Original Investigations*, USITC Pub. 4076 at 23-25; Conf. Views *Original Investigations* at 30-32; *First Reviews*, USITC Pub. 4538 at 27-29; Conf. Views *First Reviews* at 41-45; *Second Reviews*, USITC Pub. 5147 at 16-20; Conf. Views *Second Reviews* at 20-25.

subject import volume from China in the original investigations.⁷⁰ The volume of subject imports fluctuated upward during the POR; it increased from 12.1 million pounds in 2020 to 64.2 million pounds in 2021 and declined to 57.0 million pounds in 2022 and 41.6 million pounds in 2023 and then to 32.8 million pounds in 2024, equivalent to *** percent of apparent U.S. consumption that year.⁷¹ Given the sharp drop in subject import volumes since the original investigations, we find that the limited information on the record indicates that in the absence of the orders the subject import volume would have likely have been even higher.⁷² However, the continued presence of subject imports, despite the orders, indicates the attractiveness of the U.S. market. We also note that the volume of subject imports from China tripled from 2019 to 2024, and their share of apparent U.S. consumption increased from *** percent to *** percent,⁷³ further demonstrating the attractiveness of the U.S. market.

While the record in these five-year reviews contains limited information on the subject foreign industry, the available information indicates that the industry is very large. The domestic producers have identified ten possible producers of CACCS in China.⁷⁴ The record indicates that since the first reviews, the CACCS industry in China has added significant production capacity and further increased its ability to export to the United States.⁷⁵ Further,

⁷⁰ CR/PR at 1.19—1.20, Tables 1.6 & 1.7; *see also* Domestic Producers' NOI Response at 18. The Commission utilized official Commerce import data to compile imports from China and nonsubject countries in these reviews as well as during all prior proceedings. CR/PR at Table 1.7, note. We acknowledge that the Commission utilized a different data source (questionnaire responses) to compile subject imports from Canada during the original investigations than it did during these reviews (Census-edited Customs records). CR/PR at Table 1.7, note; *Original Investigations*, USITC Pub. 4076 at 4, I-4. As noted above, HTSUS statistical reporting number 3824.90.9290, now decommissioned, was used in obtaining U.S. import statistics during the previous proceedings. *Id.* at 1.19, Table 1.6 note; *Original Investigations*, USITC Pub. 4076 at 4, I-4. The number's successor, statistical reporting number 3924.99.9397, was not used during these reviews given that it refers to crude calcium citrate and blends containing other subject product, under which only negligible amounts of subject merchandise are likely to be imported. CR/PR at 1.19.

⁷¹ CR/PR at 1.19—1.20, Tables 1.6 & 1.7. The Domestic Producers contend that since the orders were imposed in 2009, the volumes of subject imports from China have declined significantly and have remained at relatively low levels. Domestic Producers' NOI's Response at 27. *See* section III.B.ii, above.

⁷² *See* CR/PR at 1.19—1.20, Tables 1.6 & 1.7. In addition, we note that citric acid or citrate salts from China have been subject to other antidumping duty investigations outside the United States, *i.e.*, Brazil, Colombia, the European Union (EU), the Eurasian Economic Union (EEU), India, Thailand, and Turkey. CR/PR at 1.24—1.25. India, Thailand and Turkey continue to impose antidumping duties on citric acid or citrate salts from China. *Id.* at 1.25.

⁷³ CR/PR at Table 1.7.

⁷⁴ CR/PR at 1.21; Domestic Producers' NOI Response at 37, Exh. 1b.

⁷⁵ Domestic Producers' NOI Response at 24-25. For example, the Domestic Producers note that in May 2023, the Chinese producer Shandong Ensign Industry Co., Ltd. announced that it had completed a project that will produce 400,000 metric tons (881.8 million pounds) of citric acid. *Id.* at 25, Exh. 4

the Domestic Producers assert that Chinese producers of citric acid have enough production capacity to flood the U.S. market with very large volumes of citric acid.⁷⁶ In 2024, China reportedly accounted for *** percent of global CACCS capacity and production.⁷⁷

Global Trade Atlas (“GTA”) data indicate that in 2024, China exported 3.4 billion pounds of merchandise under HS subheadings 2918.14 and 2918.15, citric acid and salts and esters of citric acid, which may include out-of-scope merchandise.⁷⁸ China is by far the world’s largest exporter under these subheadings,⁷⁹ and its exports in 2024 is equivalent to more than *** times the apparent U.S. consumption for CACCS in the same year.⁸⁰ We accordingly find that the Chinese CACCS industry is export oriented and has the ability to export significant volumes of subject merchandise to the United States.⁸¹

Thus, the subject foreign producers have the means and the incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the orders were revoked. In light of these considerations, including the significant and increasing volume of subject imports during the original investigations, the presence of subject imports in the U.S. market during the POR notwithstanding the imposition of the orders, the subject foreign industry’s substantial capacity, including excess capacity,⁸² and large volume of exports, and the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

(“Citric Acid Market Size and Outlook, 2025-2033,” www.straitsresearch.com”). The company also announced plans to expand its citric acid capacity to 600,000 metric tons (1.3 billion pounds) in the near future. *Id.* According to the Domestic Producers, in 2024, Chinese CACCS producers produced 1.82 metric tons (4.0 billion pounds) of citric acid, an amount that is *** in 2024. *Id.* at 25, Exh. 1 (U.S. production volume), Exh. 4, CR/PR at Table 1.5. *See also* Final Comments at 9; *Second Reviews*, USITC Pub. 5147 at 18.

⁷⁶ Domestic Producers’ NOI Response at 25; *see also* Final Comments at 9-10.

⁷⁷ CR/PR at 1.26.

⁷⁸ CR/PR at 1.23, 1.26, Tables 1.9 & 1.10.

⁷⁹ From 2020 to 2024, the volume of exports of citric acid and salts and esters of citric acid from China was greater than the export volume of the same merchandise from all the reported exporters combined. *Calculated from* CR/PR at 1.23, 1.26, Tables 1.9 & 1.10. China accounted for over 74 percent of global exports of citric acid and sales and esters of citric acid from 2022 through 2024. *Id.* at 1.26. Mexico ranked among the Chinese industry’s top export destinations. *Id.*

⁸⁰ *Calculated from* CR/PR at 1.20, 1.26, Tables 1.7 & 1.10.

⁸¹ CR/PR at 1.23, 1.26, Tables 1.7 & 1.10; Domestic Producers’ NOI Response at 24-27; *see also* *Second Reviews*, USITC Pub. 5147 at 18-20.

⁸² Domestic Producers’ NOI at 24; Final Comments at 9.

D. Likely Price Effects of Subject Imports

We have considered our findings regarding the price effects of subject imports in the original investigations, and likely price effects of subject imports in subsequent reviews.⁸³ As an initial matter, we found that CACCS were commodity products, and that price was an important factor in purchasing decisions in each of these proceedings.⁸⁴

In the original investigations the Commission found that the pricing data showed mixed underselling and overselling.⁸⁵ It found that the filing of the petitions in April 2008 affected prices in the U.S. market, because prices of subject imports rose substantially during 2008, and underselling was much more prevalent before the petitions were filed.⁸⁶ The pricing data overall supported a finding of significant underselling, particularly for a commodity type product for which large price differences would not be expected. The Commission observed that subject import pricing acted as a cap or ceiling on the price levels that could be obtained by domestic producers, and that the underselling that occurred was significant because it established the cap or ceiling at low levels.⁸⁷ Although it did not find significant price depression, the Commission found that the domestic industry was not able to increase its prices to levels sufficient to cover increases in its costs during the POI, despite strong and increasing demand.⁸⁸ It found that the industry's inability to obtain higher prices in 2007 was due in significant part to the large and growing presence of relatively low-priced subject imports.⁸⁹

⁸³ *Original Investigations*, USITC Pub. 4076 at 23, 25-32; Conf. Views Original Investigations at 32-43; *First Reviews*, USITC Pub. 4538 at 31-32; Conf. Views First Reviews at 48-49; *Second Reviews*, USITC Pub. 5147 at 21-22; Conf. Views Second Reviews at 28.

⁸⁴ *Original Investigations*, USITC Pub. 4076 at 25). Moreover, in the subsequent reviews, the Commission found that the domestic like product and subject imports have a moderate-to-high degree of substitutability and that price is an important factor in purchasing decisions. *First Reviews*, USITC Pub. 4538 at 26, 31; *Second Reviews*, USITC Pub. 5147 at 21.

⁸⁵ *Original Investigations*, USITC Pub. 4076 at 26. There was underselling by subject imports from China in 68 of 119 quarterly pricing comparison (or 57.1 percent), with margins ranging up to 31.7 percent. Conf. Original Investigations Conf. Report at V-36, Table V-10; see also Conf. Original Investigations at 35; *Original Investigations*, USITC Pub. 4076 at 26 n.182.

⁸⁶ *Original Investigations*, USITC Pub. 4076 at 27.

⁸⁷ *Original Investigations*, USITC Pub. 4076 at 28.

⁸⁸ *Original Investigations*, USITC Pub. 4076 at 28.

⁸⁹ *Original Investigations*, USITC Pub. 4076 at 28-29. The Commission indicated that costs for the domestic industry's largest single cost item, corn, spiked from 2006 to 2007. *Id.* The reason that the industry was unable to negotiate price increases for its long-term contracts was not its inability to anticipate this spike but was instead largely due to the increased presence of low-priced imports. *Id.*

Accordingly, the Commission found that the large and increasing volume of cumulated subject imports had significantly suppressed prices for the domestic like product.⁹⁰

In each subsequent review the Commission found that price played an important role in purchasing decisions and that the domestic like product and subject imports have a moderate-to-high degree of substitutability.⁹¹ As discussed in section III.B.iii above, in this review, we continue to find that price plays an important role in purchasing decisions and that the domestic like product and subject imports have a moderate-to-high degree of substitutability.

The record in these expedited five-year reviews does not contain recent product-specific pricing information. Based on the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that the likely significant volume of subject imports would likely engage in underselling that would establish a cap or ceiling on prices obtained by domestic producers, as in the original investigations.⁹² Absent the discipline of the orders, the likely significant volumes of low-priced subject imports would force the domestic industry to lower prices or forgo needed price increases, or else lose sales and market share to subject imports. Consequently, we find that if the orders were to be revoked, subject imports would likely have significant price effects.

E. Likely Impact of Subject Imports⁹³

We have considered our findings regarding the impact of subject imports in the original investigations, and the likely impact of subject imports in subsequent reviews.⁹⁴ The record in these five-year reviews contains limited information concerning the domestic industry's performance since the period examined in the last reviews.⁹⁵

⁹⁰ *Original Investigations*, USITC Pub. 4076 at 32.

⁹¹ *First Reviews*, USITC Pub. 4538 at 31-32; Conf. Views *First Reviews* at 48-49; *Second Reviews*, USITC Pub. 5147 at 21-22; Conf. Views *Second Reviews* at 28.

⁹² *Original Investigations*, USITC Pub. 4076 at 30-32.

⁹³ In its expedited third review of the antidumping duty order on China, Commerce determined that revocation of the antidumping duty order would likely result in the continuation or recurrence of dumping with margins of up to 156.87. *Commerce's Third Five-Year Review Final Results - CACCS Antidumping Duty Order*, 91 Fed. Reg. at 20093, and accompanying AD IDM at 10. Moreover, in its expedited third review of the countervailing duty order on China, Commerce determined that revocation of the countervailing duty order would likely result in the continuation or recurrence of subsidy rates of up to 166.34 percent *ad valorem*. *Commerce's Third Five-Year Review Final Results - CACCS Countervailing Duty Order*, 91 Fed. Reg. at 20106, and accompanying AD IDM at 13.

⁹⁴ *Original Investigations*, USITC Pub. 4076 at 32-37; Conf. Views *Original Investigations* at 43-50; *First Reviews*, USITC Pub. 4538 at 34-38; Conf. Views *First Reviews* at 52-58; *Second Reviews*, USITC Pub. 5147 at 24-25; Conf. Views *Second Reviews* at 31-33.

⁹⁵ We note that domestic industry data from the prior proceedings are comparable to the data in the current reviews; as in all the prior proceedings the domestic producers accounted for "all or virtually

The information available indicates that the domestic industry's performance in 2024 was generally *** than in the prior proceedings.⁹⁶ The industry's capacity, production, and U.S. shipments, at 487.9 million pounds, 365.0 million pounds and 328.1 million pounds, respectively, were all lower in 2024 than in the prior proceedings.⁹⁷ Similarly, the domestic industry's capacity utilization rate was lower in 2024, at 74.8 percent, than any prior period examined.⁹⁸ The industry's U.S. shipments value, at \$334.9 million, was the third lowest of any period examined; however, its U.S. shipments' unit value, at \$1.02, was higher than in any prior proceeding.⁹⁹ In 2024 its ratio of cost of goods sold ("COGS") to net sales, at *** percent, was the highest of any period examined.¹⁰⁰ The domestic industry's gross profits and operating income were *** and ***, respectively, and were worse than in any prior proceeding.¹⁰¹ Its net sales value, at \$336.7 million, was the third lowest of any period examined.¹⁰² The industry's operating income *** margin, at *** percent, was substantially lower than in the prior reviews and equal to that in the original investigations.^{103 104} In light of the industry's weak performance in 2024, including its declining capacity utilization, operating income, and market share,¹⁰⁵ and our recent preliminary determination finding material injury in the related investigation of CACCS from four countries,¹⁰⁶ we find that the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.¹⁰⁷

all" U.S. production. CR/PR at 1.15, B.3, Table B.1; *see also Original Investigations*, USITC Pub. 4076 at I-3; Conf. Views Original Investigations at 43-50; *First Reviews*, USITC Pub. 4538 at I-3 (domestic producers accounted for all domestic production of CACCS in 2008); CACCS from China, Original Investigations Confidential Report, INV-GG-036, EDIS Doc. 871357 (Apr. 27, 2009) ("Original Investigations Conf. Report"), at I-4; *First Reviews*, USITC Pub. 4538 at I-19 (domestic producers accounted for all or virtually all domestic production of CACCS in 2013); CACCS from China, First Reviews Confidential Report, INV-NN-024, EDIS Doc. 871364 (Apr. 30, 2015) ("First Reviews Conf. Report"), at I-25; *Second Reviews*, USITC Pub. 5147 at I-9 (domestic producers accounted for all or virtually all domestic production of CACCS in 2019); CACCS from China, Second Reviews Confidential Report, INV-SS-084 (July 23, 2020), EDIS Doc. 871369 ("Second Reviews Conf. Report"), at I-9.

⁹⁶ CR/PR at 1.16, Table 1.5.

⁹⁷ CR/PR at Table 1.5.

⁹⁸ CR/PR at Table 1.5.

⁹⁹ CR/PR at Table 1.5.

¹⁰⁰ CR/PR at Table 1.5.

¹⁰¹ CR/PR at Table 1.5.

¹⁰² CR/PR at Table 1.5.

¹⁰³ CR/PR at Table 1.5.

¹⁰⁴ CR/PR at Table 1.5.

¹⁰⁵ See section III.B.ii, above.

¹⁰⁶ See section III.B.ii, above.

¹⁰⁷ Commissioner David S. Johanson does not join the majority regarding their vulnerability determination. The limited information on the record of these expedited reviews is insufficient for

Based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of subject imports that would likely undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, significant volumes of low-priced subject imports would likely engage in underselling to capture sales and market share from the domestic industry, which would force domestic producers to lower their prices or forgo needed price increases in order to maintain their sales, thereby depressing or suppressing prices for the domestic like product to a significant degree. The likely significant volume of subject imports and their likely price effects would negatively affect the domestic industry's capacity, production, capacity utilization, shipments, and market share, which would in turn negatively impact the industry's profitability and employment. Consequently, we conclude that if the orders were revoked, subject imports would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Although nonsubject imports' share of the CACCS market was substantial,¹⁰⁸ their presence in the U.S. market would not preclude subject imports from taking market share from the domestic industry, given the attractiveness of the U.S. market and that producers in China accounted for *** percent of global CACCS capacity and production in 2024.¹⁰⁹ Consequently, as we have in prior proceedings, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports, and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

In sum, we conclude that if the orders were revoked, subject imports of CACCS from China would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

Commissioner Johanson to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

¹⁰⁸ CR/PR at 1.20, Tables 1.6 & 1.7. The volume of nonsubject imports increased more than *** since the original investigations. *Id.* at Table 1.7. It was *** pounds in 2008, *** pounds in 2013, 212.3 million pounds in 2019, and *** pounds in 2024. *Id.*

¹⁰⁹ CR/PR at 1.26.

IV. Conclusion

For the above reasons, we determine that revocation of the antidumping and countervailing duty orders on CACCS from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Information obtained in these reviews

Background

On December 1, 2025, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the antidumping and countervailing duty orders on citric acid and certain citrate salts (“CACCS”) from China would likely lead to continuation or recurrence of material injury to a domestic industry.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.³ ⁴ Table 1.1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
December 1, 2025	Notice of initiation by Commerce (90 FR 55084, December 1, 2025)
December 1, 2025	Notice of institution by Commission (90 FR 55172, December 1, 2025)
March 6, 2026	Commission’s vote on adequacy
April 15, 2026	Commerce’s results of its expedited reviews
May 21, 2026	Commission’s determinations and views

¹ 19 U.S.C. 1675(c).

² FR 55172, December 1, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 90 FR 55084, December 1, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

³ As part of their response to the notice of institution, interested parties were requested to provide company-specific information. Information regarding responses to the notice of institution is presented in app. B. Summary data compiled in the original investigations and subsequent full reviews are presented in app. C.

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

The original investigations

The original investigations resulted from petitions filed on April 14, 2008 with Commerce and the Commission by Archer Daniels Midland Co., Decatur, Illinois; Cargill, Inc., Wayzata, Minnesota; and Tate & Lyle Americas, Inc., Decatur, Illinois.⁵ On April 13, 2009, Commerce determined that imports of CACCS from Canada and China were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.⁶ The Commission determined on May 22, 2009 that the domestic industry was materially injured by reason of LTFV and subsidized imports of CACCS from Canada and China.⁷ On May 29, 2009, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins of 23.21 percent for imports of CACCS from Canada and from 94.61 to 156.87 percent for imports of CACCS from China and net subsidy rates ranging from 3.60 to 118.95 percent for imports of CACCS from China.⁸

⁵ Citric Acid and Certain Citrate Salts from Canada and China, Inv. Nos. 701-TA-456 and 731-TA-1151–1152 (Final), USITC Publication 4076, May 2009 (“Original publication”), p. 1.1.

⁶ 74 FR 16843, 74 FR 16838, and 74 FR 16836, April 13, 2009.

⁷ 74 FR 25771, May 29, 2009.

⁸ 74 FR 25703 and 74 FR 25705, May 29, 2009.

The first five-year reviews

On July 7, 2014, the Commission determined that it would conduct full reviews of the antidumping duty orders on CACCS from Canada and China and the countervailing duty order on CACCS from China.⁹ On August 6, 2014, Commerce determined that revocation of the antidumping and countervailing duty orders on CACCS from Canada and China would be likely to lead to continuation or recurrence of dumping and subsidization.¹⁰ On June 12, 2015, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹¹ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective June 24, 2015, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of CACCS from Canada and China.¹²

The second five-year reviews

On August 4, 2020, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on CACCS from China.^{13 14} On September 2, 2020, Commerce determined that revocation of the antidumping and countervailing duty orders on CACCS from China would be likely to lead to continuation or recurrence of dumping and subsidization.¹⁵ On December 18, 2020, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹⁶ Following affirmative determinations in the five-year reviews by Commerce

⁹ 79 FR 42049, July 18, 2014. During the first five-year reviews, with respect to the antidumping duty order on CACCS from Canada, the Commission found the domestic group response and the respondent group response to its notice of institution were adequate and determined to conduct a full review. With respect to the antidumping and countervailing duty orders on CACCS from China during those same reviews, the Commission found that the domestic group response was adequate and that the respondent group was inadequate, but that circumstances warranted full reviews. *Ibid.*

¹⁰ 79 FR 45763, August 6, 2014.

¹¹ 80 FR 34693, June 17, 2015.

¹² 80 FR 36318, June 24, 2015.

¹³ 85 FR 74759, November 23, 2020.

¹⁴ During the second five-year reviews, the domestic interested parties withdrew their intent to participate in Commerce's review with respect to Canada. Consequently, effective June 24, 2020, Commerce revoked the antidumping duty order on CACCS from Canada and the Commission terminated its corresponding five-year review. 85 FR 37626, June 23, 2020; and 85 FR 44546, July 23, 2020.

¹⁵ 85 FR 54536, September 2, 2020.

¹⁶ 85 FR 84371, December 28, 2020.

and the Commission, effective January 4, 2021, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of CACCS from China.¹⁷

Previous and related investigations

The Commission has conducted four previous import relief investigations on CACCS, as presented in table 1.2.

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

Date	Number	Country	ITC original determination	Current status
2000	731-TA-863	China	Negative	Negative preliminary determination (65 FR 7889, February 16, 2000)
2008	731-TA-1151	Canada	Revoked	Terminated (85 FR 44546, July 23, 2020)
2017	731-TA-1374-1376	Belgium, Colombia, and Thailand	Affirmative	Orders continued after full first review (89 FR 63406, August 5, 2024)
2026	701-TA-783-784 and 731-TA-1771-1772	Canada and India	N/A	Ongoing preliminary investigation (91 FR 3221, January 26, 2026)

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.

Commerce’s five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of CACCS from China with the intent of issuing the final results of these reviews based on the facts available not later than March 31, 2026.¹⁸ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission’s Electronic Document Information System (“EDIS”). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping

¹⁷ 86 FR 72, January 4, 2021.

¹⁸ Letter from Alex Villanueva, Senior Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, January 23, 2026.

and countervailing duty orders on imports of CACCS from China are noted in the sections titled “The original investigations” and “U.S. imports,” if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

The scope of the orders 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 of the order 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 of the order 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 2 percent, by weight, of the product. The scope of the order 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.¹⁹

¹⁹ 86 FR 72, January 4, 2021.

U.S. tariff treatment

CACCS is currently 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 2918.15.10.²⁰ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Below is a summary of additional tariffs applied to the product during the period of review. See table 1.3 for a summary of additional tariffs in place as of February 24, 2026.

Section 301 tariffs

Effective September 24, 2018, CACCS originating in China was subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for CACCS increased to 25 percent.²¹

Section 122 tariffs

Effective February 24, 2026, CACCS originating in China is subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974.²²

²⁰ 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 2, Publication 5699, February 2026, pp. 29.59 and 38.23.

²¹ 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e), 20(f), and 20(g) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 2, Publication 5699, February 2026, pp. 99.3.90 to 99.3.115 and 99.3.452. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

²² The White House, Imposing a Temporary Import Surcharge to Address Fundamental International Payments Problems, February 20, 2026.

Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)²³

February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to CACCS originating in China that were in effect until February 20, 2026.²⁴

Country specific IEEPA tariffs

Effective February 4, 2025, CACCS originating in China was subject to an additional 10 percent ad valorem duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent ad valorem. However, effective November 10, 2025, that additional duty was reduced back to 10 percent.²⁵ Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.²⁶

Tariffs initiated in April 2025 under IEEPA

Effective April 5, 2025, CACCS originating in China was subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA. That duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. However, effective May 14, 2025, the duty rate for tariffs initiated in April 2025 under IEEPA on products originating in China was reduced to 10 percent.²⁷ Effective February 20,

²³ 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.

²⁴ The White House, Ending Certain Tariff Actions, February 20, 2026.

²⁵ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025; 90 FR 50725, November 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 2, Publication 5699, February 2026, pp. 99.3.4 to 99.3.5, 99.3.365, and 99.3.366.

²⁶ The White House, Ending Certain Tariff Actions, February 20, 2026.

²⁷ For China, the duty as part of tariffs initiated in April 2025 under IEEPA is in addition to the 10 percent ad valorem duty under IEEPA that went into effect on November 10, 2025. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025; 90 FR 39305, August 14, 2025; 90 FR 50729, November 7, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 2, Publication 5699, February 2026, pp. 99.3.5 to 99.3.42, 99.3.366, and 99.3.373.

2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.²⁸

²⁸ The White House, Ending Certain Tariff Actions, February 20, 2026.

Table 1.3 CACCS: Additional tariffs on imports originating in China as of February 24, 2026

Duty rates in percent ad valorem

Additional tariff	China
Section 301	25
Section 122	10
Total additional ad valorem rate	35

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 writing of this report. See the text above for historical changes to the additional tariffs.

Description and uses²⁹

The imported products subject to these reviews are citric acid and certain citrate salts, specifically sodium citrate and potassium citrate; blends containing citric acid, sodium citrate and potassium citrate; and crude calcium citrate (“CCC”). Citric acid, sodium citrate, and potassium citrate are all available either in dry form or in solution. CCC is an intermediate form in the production of citric acid via the lime/sulfuric acid process. CCC can be shipped to another facility for further processing into refined citric acid. Petitioners argued in the original investigations that the various products have only minor molecular differences which do not significantly alter their essential characteristics or uses.

The Chinese producers manufacture primarily citric acid. A witness in the original investigations stated that China’s limited resources of the sodium and potassium compounds used to make the subject salts render Chinese-produced salts less competitive in the U.S. market.

Citric acid, sodium citrate, and potassium citrate are all available as odorless, translucent crystals. These crystals are normally sold in three granulations: granular, fine granular, and powder. Purchasers can buy the dry product and put it into solution, or they can have an independent converter do it.³⁰

²⁹ Unless otherwise noted, this information is based on Citric Acid and Certain Citrate Salts from China, Investigation Nos. 701-TA-456 and 731-TA-1152 (Second Review), USITC Publication 5147, December 2020 (“Second review publication”), pp. 1.6 to 1.7.

³⁰ Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 1.15.

Citric acid is produced and sold in the U.S. market in both its dry and solution forms and can be easily and reversibly converted between these two forms. Whether dry or dissolved in water, the product's chemical properties are the same.³¹

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 ($C_6H_8O_7 \cdot H_2O$);
- Sodium citrate: Sodium citrate anhydrous or trisodium citrate anhydrous ($Na_3C_6H_5O_7$), sodium citrate dihydrate or trisodium citrate dihydrate ($Na_3C_6H_5O_7 \cdot 2H_2O$), and monosodium citrate ($NaH_2(C_3H_5O(COO)_3)$);
- Potassium citrate: Potassium citrate monohydrate or tripotassium citrate monohydrate ($K_3C_6H_5O_7 \cdot H_2O$), and monopotassium citrate ($KH_2C_6H_5O_7$); and
- Calcium citrate: Tricalcium citrate ($Ca_3(C_6H_5O_7)_2$), dicalcium citrate ($Ca_2(C_3H_4O)(COO)_3 \cdot H_2O$), and tricalcium citrate tetrahydrate ($Ca_3(C_6H_5O_7)_2 \cdot 4H_2O$).³²

Citric acid is produced as a white granular or crystalline powder and has strong acidic taste. It is produced by the fermentation of glucose from a substrate such as corn, molasses, beet molasses, sugarcane, or tapioca. Citric acid is produced both in anhydrous form and as a monohydrate. Both forms are isolated and purified through successive recrystallizations.³³

Sodium citrate is a white, granular crystalline powder with a pleasant acidic taste. Sodium citrate is produced by mixing citric acid slurry with sodium hydroxide (or sodium carbonate) and then crystallizing the resulting sodium citrate. Potassium citrate is produced by reacting citric acid slurry with potassium hydroxide (or potassium carbonate).³⁴

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; commercial and household products, such as detergents and metal cleaners; and in textile finishing treatments and other industrial applications. Citric acid is used in the food and beverage industry 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-

³¹ Ibid.

³² Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 1.16.

³³ Ibid.

³⁴ Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 1.17.

carbonated drinks, dry powdered beverages, wines and wine coolers, jams, jellies, preserves, gelatin desserts, candies, frozen foods, and canned fruits and vegetables.³⁵

Sodium citrate is used in similar applications to those of citric acid, as well as in cheese and dairy products to improve emulsifying properties, texture, and melting properties, and to act as a preservative and aging agent. It also has pharmaceutical applications such as an expectorant in cough syrup and a diuretic.³⁶

Potassium citrate is used 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 in low- or no-salt products.³⁷

The domestic producers always produce citric acid and certain citrate salts to meet the high purity U.S. Pharmacopoeia (“USP”) or Food Chemical Codex (“FCC”) standards, regardless of the intended customer/application, since the products must meet these high standards to be used by large customers in food and beverage or pharmaceutical applications.³⁸

³⁵ Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand, Investigation Nos. 731-TA-1374-1376 (Review), USITC Publication 5524, July 2024, p. 1.17.

³⁶ Ibid.

³⁷ Ibid.

³⁸ Ibid.

Manufacturing process³⁹

Citric acid is produced in a two-stage process. In the first stage, sugars are fermented using a fermenting organism such as the *Aspergillus niger* mold or the *Candida lipolytica* or *Candida guilliermondii* yeast upon a substrate. Cornstarch is the principal substrate in the United States and China, although U.S. producers may also use molasses. Some Chinese producers also use cassava, sweet potato, or wheat. 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.

Producers ferment the substrate by one of three different methods: shallow pan, 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. Some smaller, older Chinese plants may still use 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. The domestic producers use only the deep tank method. 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.

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.

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. Most Chinese producers use this process.

³⁹ Unless otherwise noted, this information is based on Investigation Nos. 701-TA-456 and 731-TA-1151-1152 (Second Review): Citric Acid and Certain Citrate Salts from Canada and China, INV-SS-084, July 23, 2020, ("Second review confidential report"), pp. 1.7 to 1.9 and Second review publication, pp. 1.7 to 1.9.

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.

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.

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.

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 by reacting citric acid slurry with potassium hydroxide or potassium carbonate. The domestic producers stated in the original investigations that they produce sodium citrate and potassium citrate using some of the same equipment and workers that are used for citric acid.

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 is shipped in drums, railcars, or tank trucks. Drums are usually 200 to 275 pounds.

Sodium citrate and potassium citrate can also be produced by some distributors that are known as “converters.” Converters can either provide citric acid as purchased from the manufacturer or blend the citric acid from the manufacturer with sodium hydroxide or potassium hydroxide to provide sodium citrate or potassium citrate, respectively.

CCC is an intermediate product of when using the lime/sulfuric acid refining method. During the original investigations, petitioners asserted, and respondents did not contradict them, that CCC has only one function – to be converted into citric acid. Petitioners stated in the original investigations that there is not a separate CCC market in the United States or anywhere else around the globe, but they have been aware of instances when CCC was shipped from one country to another for further processing. Although there are no known imports of CCC, petitioners stated in the original investigations that they included it in the scope of the petition to avoid circumvention.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from three firms, which accounted for all or virtually all of production of CACCS in the United States during 2008.⁴⁰ During the full first five-year reviews, the Commission received U.S. producer questionnaires from three firms, which accounted for all or virtually all of production of CACCS in the United States during 2013.⁴¹ During the expedited second five-year reviews, the Commission received U.S. producer questionnaires from three firms, which accounted for all or virtually all of production of CACCS during 2019.⁴²

In response to the Commission's notice of institution in these current reviews, domestic interested parties stated that they were the only known U.S. producers of CACCS in 2024.⁴³

Recent developments

Table 1.4 presents events in the U.S. industry since the Commission's last five-year reviews.⁴⁴ There have been no changes in the number of plants or capacity since the last five-year reviews, but ownership of one plant has changed.

Table 1.4 CACCS: Developments in the U.S. industry

Item	Firm	Event
Acquisition	Primient	In April 2022, Tate & Lyle Inc. transferred ownership of its citric acid plant to Primient.

Source: Mitchell, "Tate & Lyle's 'Primient' Launches," NowDecatur.com, April 5, 2022.

⁴⁰ Original publication, p. 1.3.

⁴¹ Citric Acid and Certain Citrate Salts from Canada and China, Inv. Nos. 701-TA-456 and 731-TA-1151–1152 (First Review), USITC Publication 4538, June 2015 ("First review publication"), p. 1.19.

⁴² Second review publication, p. 1.9.

⁴³ Domestic interested parties' response to the notice of institution, December 23, 2025, p. 37.

⁴⁴ For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.5 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

Table 1.5 CACCS: Trade and financial data submitted by U.S. producers, by period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars; unit value in dollars per pound dry weight; ratio in percent

Item	Measure	2008	2013	2019	2024
Capacity	Quantity	553,913	558,322	555,316	487,978
Production	Quantity	507,917	481,724	474,456	365,060
Capacity utilization	Ratio	91.7	86.3	85.4	74.8
U.S. shipments	Quantity	402,518	444,282	428,423	328,157
U.S. shipments	Value	214,641	343,010	311,292	334,969
U.S. shipments	Unit value	0.53	0.77	0.73	1.02
Net sales	Value	271,708	372,986	323,453	336,775
COGS	Value	266,120	304,219	***	***
COGS to net sales	Ratio	97.9	81.6	***	***
Gross profit or (loss)	Value	5,588	68,767	***	(4,552)
SG&A expenses	Value	13,093	19,673	***	***
Operating income or (loss)	Value	(7,505)	49,094	***	***
Operating income or (loss) to net sales	Ratio	(2.8)	13.2	***	***

Source: For the years 2008 to 2019, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2024, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, December 23, 2025, exh 1d.

Note: For a discussion of data coverage, please see "U.S. producers" section.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.⁴⁵

In its original determinations, the Commission defined one domestic like product consisting of citric acid (whether in crude form as calcium citrate or in finished form), sodium citrate, and potassium citrate in all chemical and physical forms and grades. In its full first five-year review determinations and its expedited second five-year review determinations, the Commission defined the domestic like product as the same as in the original investigations. In its original determinations, full first five-year review determinations, and expedited second five-year review determinations, the Commission defined the domestic industry as consisting of all domestic producers of citric acid and citrate salts.⁴⁶

⁴⁵ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

⁴⁶ 90 FR 55172, December 1, 2025.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 31 firms, which accounted for approximately 100 percent of total U.S. imports of CACCS from Canada and approximately 86.5 percent of total U.S. imports of CACCS from China during 2008.⁴⁷ Import data presented in the original investigations are based on the questionnaire response of Jungbunzlauer Technology GmbH & Co. (“JBL”) for U.S. imports from Canada and official Commerce statistics for China and all other sources.⁴⁸

During the full first five-year reviews, the Commission received U.S. importer questionnaires from 19 firms, which accounted for approximately *** percent of total U.S. imports of CACCS from China during 2013 (all U.S. imports of CACCS from Canada and *** percent of U.S. imports of CACCS from China).⁴⁹ Import data presented in the first reviews are based on questionnaire responses for U.S. imports from Canada, proprietary data for U.S. imports from China, and official Commerce statistics for U.S. imports from all other sources.⁵⁰

Although the Commission did not receive responses from any respondent interested parties in its expedited second five-year reviews, the domestic interested parties provided a list of 200 firms that may have imported CACCS from China.⁵¹ Import data presented in the second reviews are based on proprietary data for U.S. imports from Canada and official Commerce statistics for U.S. imports from China and all other sources.⁵²

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission’s notice of institution, the domestic interested parties provided a list of 26 potential U.S. importers of CACCS.⁵³

⁴⁷ Original publication, p. IV-1.

⁴⁸ Ibid.

⁴⁹ Investigation Nos. 701-TA-456 and 731-TA-1151-1152 (Review): Citric Acid and Certain Citrate Salts from Canada and China, INV-NN-024, April 30, 2015 (“First review confidential report”), p. 4.1.

⁵⁰ First review publication, p. 4.1.

⁵¹ Second review publication, p. 1.12.

⁵² Second review publication, p. 1.13.

⁵³ Domestic interested parties’ response to the notice of institution, December 23, 2025, exh 1b.

U.S. imports

Table 1.6 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2024 imports by quantity).

Table 1.6 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

U.S. imports from	Measure	2020	2021	2022	2023	2024
China	Quantity	12,166	64,292	57,028	41,619	32,843
Canada	Quantity	***	***	***	***	***
Thailand	Quantity	128,893	162,975	133,588	176,640	181,559
Colombia	Quantity	16,658	12,468	18,478	34,202	42,385
All other sources	Quantity	66,771	32,583	54,197	67,875	84,104
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	10,513	50,262	64,397	34,056	29,491
Canada	Value	***	***	***	***	***
Thailand	Value	75,913	153,671	203,451	182,496	155,396
Colombia	Value	8,914	8,186	20,249	37,061	38,141
All other sources	Value	71,646	69,977	144,547	148,990	122,816
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	0.86	0.78	1.13	0.82	0.90
Canada	Unit value	***	***	***	***	***
Thailand	Unit value	0.59	0.94	1.52	1.03	0.86
Colombia	Unit value	0.54	0.66	1.10	1.08	0.90
All other sources	Unit value	1.07	2.15	2.67	2.20	1.46
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

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 12, 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.

Note: HTS statistical reporting number 3824.90.9290, now decommissioned, was used in obtaining U.S. import statistics during previous reviews. This number's successor, statistical reporting number 3824.99.9397, refers to crude calcium citrate and blends containing other subject product, under which only negligible amounts of subject merchandise are likely to be imported.

Note: Because of rounding, figure may not add to total shown. Quantities shown as "0" represent values greater than zero, but less than 1,000 pounds. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Apparent U.S. consumption and market shares

Table 1.7 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.7 CACCS: Apparent U.S. consumption and market shares, by source and period

Quantity in 1,000 pounds dry weight; value in 1,000 dollars; shares in percent

Source	Measure	2008	2013	2019	2024
U.S. producers	Quantity	402,518	444,282	428,423	328,157
China	Quantity	193,727	***	11,246	32,843
Nonsubject sources	Quantity	***	***	212,395	***
All import sources	Quantity	***	***	***	***
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	214,641	343,010	311,292	334,969
China	Value	118,342	***	9,678	29,491
Nonsubject sources	Value	41,058	157,556	143,088	***
All import sources	Value	***	***	***	***
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
China	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
China	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2008, 2013, and 2019, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2024, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 2918.14.0000, 2918.15.1000, and 2918.15.5000, accessed January 12, 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.

Note: HTS statistical reporting number 3824.90.9290, now decommissioned, was used in obtaining U.S. import statistics during previous reviews. This number's successor, statistical reporting number 3824.99.9397, refers to crude calcium citrate and blends containing other subject product, under which only negligible amounts of subject merchandise are likely to be imported.

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from 14 firms, which accounted for approximately 90 percent of CACCS exports from China to the United States during 2008.⁵⁴

Although the Commission did not receive responses from any respondent interested parties in its full first five-year reviews, the domestic interested parties provided a list of 16 possible producers of CACCS in China in that proceeding.⁵⁵

Although the Commission did not receive responses from any respondent interested parties in its expedited second five-year reviews, the domestic interested parties provided a list of 10 possible producers of CACCS in China in that proceeding.⁵⁶

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 10 possible producers of CACCS in China.⁵⁷

⁵⁴ Original publication, p. 7.3.

⁵⁵ First review publication, p. 4.12.

⁵⁶ Second review publication, p. 1.15.

⁵⁷ Domestic interested parties' response to the notice of institution, December 23, 2025, exh. 1b.

Recent developments

Table 1.8 presents events in the Chinese industry since the Commission's last five-year reviews.

Table 1.8 CACCS: Developments in the Chinese industry

Item	Firm	Event
Plant opening	Jilin Union Biotechnology Co., Ltd.	In 2024, Jilin Union Biotechnology brought onstream a new 150,000 MT per year citric acid plant.
Expansion	Weifang Ensign Industry Co., Ltd.	***
Closure	COFCO Biotechnology Co., Ltd.	***
Closure	Juxian Hongde Citric Acid Co., Ltd.	***

Source: Zeng et al., *Citric Acid*, S&P Global, *Chemical Economics Handbook*, June 2024, p. 111. Kemiex, #jilinunionbiotechnology, LinkedIn, https://www.linkedin.com/posts/kemiex_jilinunionbiotechnology-citricacid-expansionproject-activity-7161275129707036672-EVbb, accessed February 5, 2026.

Exports

Table 1.9 presents export data for citric acid and salts and esters of citric acid, categories that include CACCS and out-of-scope products, from China (by export destination in descending order of quantity for 2024).

Table 1.9 Citric acid and salts and esters of citric acid: Quantity of exports from China, by destination and period

Quantity in 1,000 pounds

Destination market	2020	2021	2022	2023	2024
India	2,573,832	2,924,746	3,288,346	3,200,543	3,449,389
Russia	215,349	226,380	249,536	285,750	297,628
Mexico	139,164	155,391	160,610	173,454	212,595
Poland	118,857	162,151	187,689	150,967	184,742
Japan	82,655	131,494	77,525	134,586	149,781
Netherlands	137,451	149,050	157,692	138,698	139,655
Germany	96,548	126,802	116,784	140,715	132,302
Indonesia	101,060	127,329	143,163	134,304	120,461
Spain	96,644	101,876	122,422	103,595	117,981
Belgium	58,663	71,596	64,957	72,999	101,226
All other markets	1,464,160	1,605,343	1,923,550	1,763,518	1,896,446
All markets	2,573,832	2,924,746	3,288,346	3,200,543	3,449,389

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 2918.14 and 2918.15, accessed January 30, 2026. These data may be overstated as HS subheading 2918.15 may contain products outside the scope of these reviews.

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

Third-country trade actions

Antidumping duty orders covering imports of citric acid or citrate salts from China have been imposed by Brazil,⁵⁸ Colombia, the European Union (EU),⁵⁹ the Eurasian Economic Union, India, Thailand,⁶⁰ and Turkey.⁶¹

On October 17, 2017, the Brazilian Ministry of Economy extended the antidumping duty order on CACCS from China. The antidumping duty order imposed a specific duty ranging from a minimum of US\$ 835.32 per MT to a maximum of US\$ 861.52 per MT.⁶² On October 18, 2023, Brazil extended the order on CACCS from China with duties ranging from US\$ 252.89 per MT to US\$ 861.50 per MT.⁶³

In 2014, Colombia initiated antidumping investigations of citric acid and sodium citrate. The Colombian Ministry of Commerce, Industry and Tourism did not impose antidumping duties on citric acid, but it did impose them on sodium citrate from China effective March 20, 2015. The antidumping duty is the difference between the FOB price and the reference FOB price of US\$1.80 per kg. On March 22, 2018, Colombia concluded a review and extended the antidumping duty order on sodium citrate from China.⁶⁴ On March 22, 2023, Colombia terminated the order on sodium citrate from China.⁶⁵

The EU has imposed antidumping duties on citric acid and trisodium citrate dihydrate from China. The antidumping duties range from 6.6 percent to 42.7 percent ad valorem. The orders were extended in 2015.⁶⁶ The EU extended the orders on citric acid and trisodium citrate dihydrate on April 14, 2021. The revised antidumping duties range from 15.3 percent to 42.7 percent ad valorem.⁶⁷

⁵⁸ Brazil issued antidumping duty measures on CACCS from China in July 2012. First review publication, p. 4.12.

⁵⁹ The EU issued antidumping duties against citric acid from China in December 2008 and continued the application of its order as a result of an expiry review that was completed in January 2015. First review publication, p. 4.12.

⁶⁰ Thailand issued antidumping duty measures on the CACCS from China in January 2012. First review publication, p. 4.12.

⁶¹ The Eurasian Economic Union includes Armenia, Belarus, Kazakhstan, Kyrgyzstan, and Russia. Ukraine had an antidumping duty order on citric acid from China at the time of the first review but allowed it to expire on May 28, 2018. Second review publication, p. 1.17.

⁶² Second review publication, p. 1.17.

⁶³ WTO Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, accessed February 6, 2026.

⁶⁴ Second review publication, p. 1.17.

⁶⁵ WTO Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, accessed February 6, 2026.

⁶⁶ Second review publication, p. 1.18.

⁶⁷ EU Implementing Regulation 2021/607, April 14, 2021.

On April 10, 2015, the Eurasian Economic Commission imposed antidumping duties on citric acid from China ranging from 4.2 percent to 16.97 percent ad valorem. The salts and esters of citric acid are not covered by the antidumping duty order.⁶⁸ On April 9, 2020, the Eurasian Economic Commission terminated the order.⁶⁹

India imposed antidumping duties on sodium citrate from China on May 20, 2015. The specific duty was US\$ 367.59 per MT. On April 30, 2020, India issued its final findings on a review of this antidumping duty order, with specific duties ranging from US\$96.05 per MT to US\$ 152.78 per MT.⁷⁰ On February 12, 2025, India extended the order on sodium citrate from China.⁷¹

Antidumping duties in Thailand on citric acid from China are 57.79 percent ad valorem.⁷² The order was extended on December 19, 2025.⁷³

On December 28, 2024, Turkey imposed antidumping duties ranging from 29.1 percent to 63.9 percent ad valorem on citric acid from China. The order does not include salts of citric acid.⁷⁴

⁶⁸ Second review publication, p. 1.18.

⁶⁹ WTO Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, accessed February 6, 2026.

⁷⁰ Second review publication, p. 1.18.

⁷¹ WTO Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, accessed February 6, 2026.

⁷² Second review publication, p. 1.18.

⁷³ WTO Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, accessed February 6, 2026.

⁷⁴ WTO Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, accessed February 6, 2026.
Government of Turkey, Announcement No. 2024/34 (Citric Acid – People’s Republic of China), December 28, 2024, <https://ticaret.gov.tr/ithalat/ticaret-politikasi-savunma-araclari/damping-ve-subvansiyon/sorusturmalar/tamamlanan-sorusturmalar-completed-investigations/ds-teblig-no-2024-34-sitrik-asit-cin-halk-cumhuriyeti-citric-acid-peoples-republic-of-china>, accessed February 6, 2026.

The global market

Table 1.10 presents global export data for citric acid and salts and esters of citric acid, categories that include CACCS and out-of-scope products (by source in descending order of quantity for 2024).

China was reported to account for *** percent of global CACCS capacity and production in 2024.⁷⁵ In table 1.10, China accounted for over 74 percent of global exports in 2022, 2023, and 2024.

Table 1.10 Citric acid and salts and esters of citric acid: Quantity of global exports by country and period

Quantity in 1,000 pounds

Exporting country	2020	2021	2022	2023	2024
China	2,573,832	2,924,746	3,288,346	3,200,543	3,449,389
Belgium	318,060	324,993	257,894	163,440	237,726
Thailand	216,078	233,872	177,831	248,204	232,106
Germany	154,850	175,838	189,253	153,061	167,103
Netherlands	107,836	125,085	102,522	100,734	99,290
Colombia	70,692	59,072	59,929	67,173	70,846
Poland	42,199	48,493	49,708	46,956	65,390
United States	40,358	41,925	52,672	46,195	51,053
India	20,254	31,972	34,968	48,834	48,781
Turkey	13,454	46,531	29,496	35,842	43,988
All other exporters	165,354	204,941	178,354	196,408	187,355
All exporters	3,722,968	4,217,468	4,420,974	4,307,390	4,653,026

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 2918.14 and 2918.15, accessed January 30, 2026. These data may be overstated as HS subheading 2918.15 may contain products outside the scope of these reviews.

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

⁷⁵ Zeng et al., *Citric Acid*, S&P Global, *Chemical Economics Handbook*, June 2024, pp. 8 and 10.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
90 FR 55172 December 1, 2025	Citric Acid and Certain Citrate Salts from China; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2025-12-01/pdf/2025-21682.pdf
90 FR 55084 December 1, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2025-12-01/pdf/2025-21697.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of the following entities:

1. Archer-Daniels-Midland Company ("ADM"), Cargill, Incorporated ("Cargill"), and Primary Products Ingredients Americas LLC ("Primient"), domestic producers of CACCS (collectively referred to herein as “domestic interested parties”)

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table B.1.

Table B.1 CACCS: Summary of responses to the Commission’s notice of institution

Interested party type	Number	Coverage
U.S. producers	3	***

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of CACCS during 2024. Domestic interested parties’ response to the notice of institution, December 23, 2025, p. 1.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from domestic interested parties ADM, Cargill, and Primient. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on CACCS.¹

Company-specific information

Table B.2 CACCS: Response checklist for U.S. producers

Yes = provided response; no = did not provide a response; NA = not available; not known = information was not known

Item	ADM	Cargill	Primient
Nature of operation	Yes	Yes	Yes
Statement of intent to participate	Yes	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes	Yes
U.S. producer list	Yes	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes	Yes
List of sources for national/regional prices	Not known	Not known	Not known
Trade/financial data	Yes	Yes	Yes
Changes in supply/demand	Yes	Yes	Yes
Complete response	Yes	Yes	Yes

¹ Domestic interested parties' comments on adequacy, December 23, 2025, pp. 1 to 2.

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C-1

Citric acid and certain citrate salts: Summary data concerning the U.S. market, 2006-2008

(Quantity=1,000 dry pounds, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per pound;
period changes=percent, except where noted)

Item	Reported data			Period changes		
	2006	2007	2008	2006-08	2006-07	2007-08
U.S. consumption quantity:						
Amount	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***
Importers' share (1):						
Canada	***	***	***	***	***	***
China	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Total imports	***	***	***	***	***	***
U.S. consumption value:						
Amount	***	***	***	***	***	***
Producers' share (1)	***	***	***	***	***	***
Importers' share (1):						
Canada	***	***	***	***	***	***
China	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Total imports	***	***	***	***	***	***
U.S. imports from:						
Canada:						
Quantity	***	***	***	***	***	***
Value	***	***	***	***	***	***
Unit value	***	***	***	***	***	***
Ending inventory quantity . . .	***	***	***	***	***	***
China:						
Quantity	158,906	180,108	193,727	21.9	13.3	7.6
Value	65,542	76,571	118,342	80.6	16.8	54.6
Unit value	\$0.41	\$0.43	\$0.61	48.1	3.1	43.7
Ending inventory quantity . . .	17,701	28,685	24,376	37.7	62.0	-15.0
Subtotal:						
Quantity	***	***	***	***	***	***
Value	***	***	***	***	***	***
Unit value	***	***	***	***	***	***
Ending inventory quantity . . .	***	***	***	***	***	***
All other sources:						
Quantity	68,584	65,634	55,594	-18.9	-4.3	-15.3
Value	39,174	38,802	41,058	4.8	-0.9	5.8
Unit value	\$0.57	\$0.59	\$0.74	29.3	3.5	24.9
Ending inventory quantity . . .	***	***	***	***	***	***
All sources:						
Quantity	***	***	***	***	***	***
Value	***	***	***	***	***	***
Unit value	***	***	***	***	***	***
Ending inventory quantity . . .	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

Citric acid and certain citrate salts: Summary data concerning the U.S. market, 2006-2008

(Quantity=1,000 dry pounds, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per pound;
period changes=percent, except where noted)

Item	Reported data			Period changes		
	2006	2007	2008	2006-08	2006-07	2007-08
U.S. producers':						
Average capacity quantity	553,913	553,913	553,913	0.0	0.0	0.0
Production quantity	475,428	488,403	507,917	6.8	2.7	4.0
Capacity utilization (1)	85.8	88.2	91.7	5.9	2.3	3.5
U.S. shipments:						
Quantity	369,451	399,578	402,518	9.0	8.2	0.7
Value	165,013	180,132	214,641	30.1	9.2	19.2
Unit value	\$0.45	\$0.45	\$0.53	19.4	0.9	18.3
Export shipments:						
Quantity	96,709	114,348	112,996	16.8	18.2	-1.2
Value	41,042	47,381	57,541	40.2	15.4	21.4
Unit value	\$0.42	\$0.41	\$0.51	20.0	-2.4	22.9
Ending inventory quantity	77,606	52,316	44,638	-42.5	-32.6	-14.7
Inventories/total shipments (1)	16.6	10.2	8.7	-8.0	-6.5	-1.5
Production workers	306	300	292	-4.6	-2.0	-2.7
Hours worked (1,000s)	701	687	669	-4.5	-1.9	-2.6
Wages paid (\$1,000)	22,656	21,781	21,751	-4.0	-3.9	-0.1
Hourly wages	\$32.34	\$31.70	\$32.50	0.5	-2.0	2.5
Productivity (pounds per hour)	678.6	710.8	758.9	11.8	4.7	6.8
Unit labor costs	\$0.05	\$0.04	\$0.04	-10.1	-6.4	-4.0
Net sales:						
Quantity	466,160	513,924	515,514	10.6	10.2	0.3
Value	205,773	226,909	271,708	32.0	10.3	19.7
Unit value	\$0.44	\$0.44	\$0.53	19.4	0.0	19.4
Cost of goods sold (COGS) . .	202,849	235,123	266,120	31.2	15.9	13.2
Gross profit or (loss)	2,924	(8,214)	5,588	91.1	(2)	(2)
SG&A expenses	13,653	13,420	13,093	-4.1	-1.7	-2.4
Operating income or (loss) . .	(10,729)	(21,634)	(7,505)	30.0	-101.6	65.3
Capital expenditures	6,534	7,746	5,537	-15.3	18.5	-28.5
Unit COGS	\$0.44	\$0.46	\$0.52	18.6	5.1	12.8
Unit SG&A expenses	\$0.03	\$0.03	\$0.03	-13.3	-10.8	-2.7
Unit operating income or (loss)	(\$0.02)	(\$0.04)	(\$0.01)	36.7	-82.9	65.4
COGS/sales (1)	98.6	103.6	97.9	-0.6	5.0	-5.7
Operating income or (loss)/ sales (1)	(5.2)	(9.5)	(2.8)	2.5	-4.3	6.8

(1) "Reported data" are in percent and "period changes" are in percentage points.

(2) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

Table C-2

Citric acid: Summary data concerning the U.S. market, 2006-2008

* * * * *

Table C-3

Sodium citrate: Summary data concerning the U.S. market, 2006-2008

* * * * *

Table C-4

Potassium citrate: Summary data concerning the U.S. market, 2006-2008

* * * * *

Table C-1

CACCS: Summary data concerning the U.S. market, 2009-13, January-September 2013, and January-September 2014

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

	Reported data						
	2009	2010	Calendar year 2011	2012	2013	January to September 2013	2014
U.S. consumption quantity:							
Amount.....	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***
Importers' share (fn1):							
Canada.....	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***
All others sources.....	***	***	***	***	***	***	***
Total imports.....	***	***	***	***	***	***	***
U.S. consumption value:							
Amount.....	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***
Importers' share (fn1):							
Canada.....	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***
All others sources.....	***	***	***	***	***	***	***
Total imports.....	***	***	***	***	***	***	***
U.S. imports from:							
Canada:							
Quantity.....	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***
China:							
Quantity.....	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***
Subject sources:							
Quantity.....	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***
All other sources:							
Quantity.....	130,991	202,985	168,210	173,889	193,820	150,112	152,407
Value.....	122,040	168,191	147,607	148,710	157,556	123,017	115,872
Unit value.....	\$0.93	\$0.83	\$0.88	\$0.86	\$0.81	\$0.82	\$0.76
Ending inventory quantity.....	14,261	11,947	10,316	10,687	11,993	14,396	19,722
Total imports:							
Quantity.....	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***
U.S. producers':							
Average capacity quantity.....	541,913	541,913	541,913	553,913	558,322	418,742	418,742
Production quantity.....	497,356	432,229	476,839	522,452	481,724	364,298	370,790
Capacity utilization (fn1).....	91.8	79.8	88.0	94.3	86.3	87.0	88.5
U.S. shipments:							
Quantity.....	392,290	403,796	470,746	460,167	444,282	342,483	367,705
Value.....	327,478	324,663	366,468	360,348	343,010	267,086	256,493
Unit value.....	\$0.83	\$0.80	\$0.78	\$0.78	\$0.77	\$0.78	\$0.70
Export shipments:							
Quantity.....	55,801	43,849	37,418	36,374	35,516	28,096	21,595
Value.....	50,322	34,295	28,793	28,977	29,976	23,761	17,446
Unit value.....	\$0.90	\$0.78	\$0.77	\$0.80	\$0.84	\$0.85	\$0.81
Ending inventory quantity.....	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***
Hourly wages.....	***	***	***	***	***	***	***
Productivity (dry pounds per hour).....	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***
Net sales:							
Quantity.....	448,092	447,644	508,163	496,540	479,798	370,580	389,301
Value.....	377,801	358,958	395,262	389,326	372,986	290,848	273,939
Unit value.....	\$0.84	\$0.80	\$0.78	\$0.78	\$0.78	\$0.78	\$0.70
Cost of goods sold (COGS).....	265,835	251,424	299,220	288,953	304,219	239,504	222,219
Gross profit or (loss).....	111,966	107,534	96,042	100,373	68,767	51,344	51,720
SG&A expenses.....	14,302	14,747	16,797	17,386	19,673	14,439	13,939
Operating income or (loss).....	97,664	92,787	79,245	82,987	49,094	36,905	37,781
Capital expenditures.....	***	***	***	***	***	***	***
Unit COGS.....	\$0.59	\$0.56	\$0.59	\$0.58	\$0.63	\$0.65	\$0.57
Unit SG&A expenses.....	\$0.03	\$0.03	\$0.03	\$0.04	\$0.04	\$0.04	\$0.04
Unit operating income or (loss).....	\$0.22	\$0.21	\$0.16	\$0.17	\$0.10	\$0.10	\$0.10
COGS/sales (fn1).....	70.4	70.0	75.7	74.2	81.6	82.3	81.1
Operating income or (loss)/sales (fn1).....	25.9	25.8	20.0	21.3	13.2	12.7	13.8

Table continued next page.

Table C-1--Continued

CACCS: Summary data concerning the U.S. market, 2009-13, January-September 2013, and January-September 2014

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

	Period changes					
	2009-13	Calendar year 2009-10	2010-11	2011-12	2012-13	Jan-Sept 2013-14
U.S. consumption quantity:						
Amount.....	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***
Importers' share (fn1):						
Canada.....	***	***	***	***	***	***
China.....	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***
All others sources.....	***	***	***	***	***	***
Total imports.....	***	***	***	***	***	***
U.S. consumption value:						
Amount.....	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***
Importers' share (fn1):						
Canada.....	***	***	***	***	***	***
China.....	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***
All others sources.....	***	***	***	***	***	***
Total imports.....	***	***	***	***	***	***
U.S. imports from:						
Canada						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
China						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
All other sources:						
Quantity.....	48.0	55.0	(17.1)	3.4	11.5	1.5
Value.....	29.1	37.8	(12.2)	0.7	5.9	(5.8)
Unit value.....	(12.7)	(11.1)	5.9	(2.5)	(4.9)	(7.2)
Ending inventory quantity.....	(15.9)	(16.2)	(13.7)	3.6	12.2	37.0
Total imports:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
U.S. producers':						
Average capacity quantity.....	3.0	0.0	0.0	2.2	0.8	0.0
Production quantity.....	(3.1)	(13.1)	10.3	9.6	(7.8)	1.8
Capacity utilization (fn1).....	(5.5)	(12.0)	8.2	6.3	(8.0)	1.6
U.S. shipments:						
Quantity.....	13.3	2.9	16.6	(2.2)	(3.5)	7.4
Value.....	4.7	(0.9)	12.9	(1.7)	(4.8)	(4.0)
Unit value.....	(7.5)	(3.7)	(3.2)	0.6	(1.4)	(10.6)
Export shipments:						
Quantity.....	(36.4)	(21.4)	(14.7)	(2.8)	(2.4)	(23.1)
Value.....	(40.4)	(31.8)	(16.0)	0.6	3.4	(26.6)
Unit value.....	(6.4)	(13.3)	(1.6)	3.5	5.9	(4.5)
Ending inventory quantity.....	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***
Hourly wages.....	***	***	***	***	***	***
Productivity (dry pounds per hour).....	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***
Net sales:						
Quantity.....	7.1	(0.1)	13.5	(2.3)	(3.4)	5.1
Value.....	(1.3)	(5.0)	10.1	(1.5)	(4.2)	(5.8)
Unit value.....	(7.8)	(4.9)	(3.0)	0.8	(0.9)	(10.3)
Cost of goods sold (COGS).....	14.4	(5.4)	19.0	(3.4)	5.3	(7.2)
Gross profit or (loss).....	(38.6)	(4.0)	(10.7)	4.5	(31.5)	0.7
SG&A expenses.....	37.6	3.1	13.9	3.5	13.2	(3.5)
Operating income or (loss).....	(49.7)	(5.0)	(14.6)	4.7	(40.8)	2.4
Capital expenditures.....	***	***	***	***	***	***
Unit COGS.....	6.9	(5.3)	4.8	(1.2)	9.0	(11.7)
Unit SG&A expenses.....	28.5	3.2	0.3	5.9	17.1	(8.1)
Unit operating income or (loss).....	(53.1)	(4.9)	(24.8)	7.2	(38.8)	(2.5)
COGS/sales (fn1).....	11.2	(0.3)	5.7	(1.5)	7.3	(1.2)
Operating income or (loss)/sales (fn1).....	(12.7)	(0.0)	(5.8)	1.3	(8.2)	1.1

fn1.--Report data are in percent and period changes are in percentage points.

fn2.--Undefined.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following four firms as top purchasers of citric acid and certain citrate salts ***. Purchaser questionnaires were sent to these four firms and three firms (***) provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for finished citric acid and certain citrate salts that have occurred in the United States or in the market for citric acid and certain citrate salts in China since January 1, 2019?

Purchaser	Yes / No	Changes that have occurred
***	***	***
***	***	***
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for citric acid and certain citrate salts in the United States or in the market for citric acid and certain citrate salts in China within a reasonably foreseeable time?

Purchaser	Yes / No	Anticipated changes
***	***	***
***	***	***
***	***	***

