

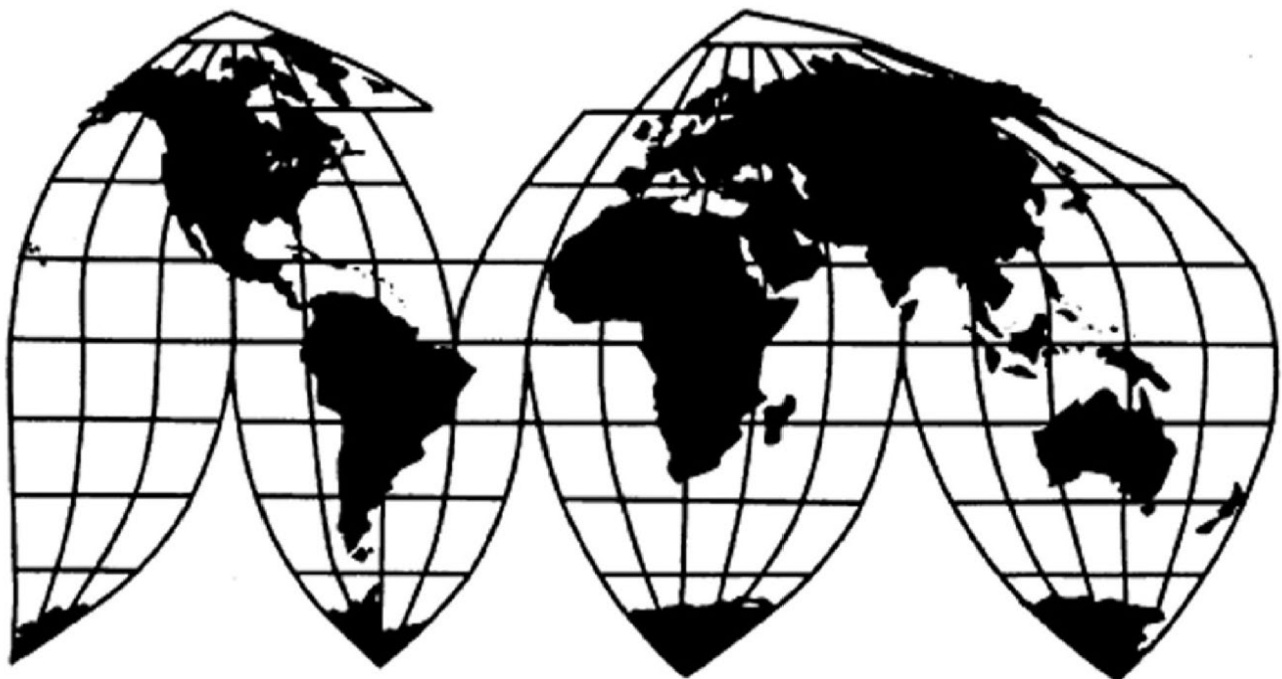
Thermoformed Molded Fiber Products from China and Vietnam

Investigation Nos. 701-TA-739–740 and 731-TA-1716–1717 (Final)

Publication 5964

January 2026

U.S. International Trade Commission



U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets ([]) in confidential reports and is deleted and replaced with asterisks (***) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-739-740 and 731-TA-1716-1717 (Final)

Thermoformed Molded Fiber Products from China and Vietnam

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of thermoformed molded fiber products (TMFPs) from China and Vietnam, provided for in subheading 4823.70.00 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”), and imports of the subject merchandise from China and Vietnam that have been found to be subsidized by the governments of China and Vietnam.^{2 3}

BACKGROUND

The Commission instituted these investigations effective October 8, 2024, following receipt of petitions filed with the Commission and Commerce by American Molded Fiber Coalition, which is comprised of Genera Inc. (“Genera”), Vonore, Tennessee; Tellus Products, LLC (“Tellus”), Belle Glade, Florida; and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO (“USW”). The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of TMFPs from China and Vietnam were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be

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

² 90 FR 46787, 90 FR 46791, 90 FR 46800, and 90 FR 46805 (September 30, 2025).

³ The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determination are likely to undermine seriously the remedial effect of the countervailing duty orders on TMFPs from Vietnam. Commissioner Johanson dissented with respect to the critical circumstances determination.

held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on May 12, 2025 (90 FR 23066, May 30, 2025, as revised in 90 FR 25642, June 17, 2025).⁴ The Commission conducted its hearing on September 30, 2025. All persons who requested the opportunity were permitted to participate.

⁴ Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in a subsequent notice published in the *Federal Register* on November 21, 2025 (90 FR 52697).

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of thermoformed molded fiber products (“TMFPs”) from China and Vietnam found by the U.S. Department of Commerce (“Commerce”) to be sold at less than fair value (“LTFV”) and subsidized by the governments of China and Vietnam. We also find that critical circumstances exist with respect to TMFPs from Vietnam that are subject to Commerce’s final affirmative critical circumstances determinations.¹

I. Background

The American Molded Fiber Coalition (“Petitioner”), comprised of two domestic producers of thermoformed molded fiber products (“TMFPs”) and a certified labor union representative of the domestic TMFP industry, filed the petitions in these investigations on October 8, 2024.² Petitioner participated in the hearing with counsel and submitted prehearing and posthearing briefs.³

One respondent entity participated in these final investigations. World Centric, a U.S. importer of subject merchandise, appeared in the hearing with counsel and submitted prehearing and posthearing briefs.⁴

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

² Confidential Staff Report INV-XX-139 (Dec. 4, 2025), as revised by INV-XX-144 (Dec. 11, 2025) (“CR”) at 1.1; *Thermoformed Molded Fiber Products from China and Vietnam*, Inv. Nos. 701-TA-739-740 and 731-TA-1716-1717 (Final), USTIC Pub. 5694 (Jan. 2026) (“PR”) at 1.1 (together, “CR/PR”). Petitioner’s members include domestic producers Genera Inc. (“Genera”) and Tellus Products, LLC (“Tellus”), and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO (“USW”). *Id.* Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission revised its schedule for this proceeding. In addition, due to government closure per Executive Order 14371, the Commission tolled its deadline by two days.

³ American Molded Fiber Coalition’s Prehearing Brief, EDIS Doc. 862433 (Sept. 19, 2025) (“Petitioner’s Prehear. Br.”); American Molded Fiber Coalition’s Posthearing Brief, EDIS Doc. 864568 (Nov. 20, 2025) (“Petitioner’s Posthear. Br.”).

⁴ World Centric’s Prehearing Brief, EDIS Doc. 862519 (Sept. 22, 2025) (“World Centric’s Prehear. Br.”); World Centric’s Posthearing Brief, EDIS Doc. 864565 (Nov. 20, 2025) (“World Centric’s Posthear. Br.”). Several additional respondent entities participated in the preliminary investigations, including KD Distributing, LLC dba Ultra Green Packaging (“Ultra Green”) a U.S. importer of subject merchandise. *Thermoformed Molded Fiber Products from China and Vietnam*, Inv. Nos. 701-TA-739-740 and 731-TA-1716-1717 (Preliminary), USTIC Pub. 5568 (Dec. 2025) (“*Preliminary Determinations*”) at 4. A representative of Ultra Green appeared at the hearing in these final phase investigations as an

U.S. industry data are based on the questionnaire responses of nine domestic producers, which accounted for virtually all known U.S. production of TMFPs in 2024.⁵ U.S. import data are based on questionnaire responses from 41 U.S. importers, estimated to have accounted for 70.0 percent of subject imports from China, nearly all subject imports from Vietnam, and a majority of nonsubject imports in 2024.⁶

The Commission received responses to its foreign producer questionnaires from 11 firms, nine of which produced TMFPs in China or Vietnam,⁷ whose exports accounted for *** percent of subject imports from China in 2024 and *** percent of subject imports from Vietnam in 2024.⁸

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁹ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of

interested party witness on Respondents’ panel. None of these additional parties submitted any briefing during these final investigations.

⁵ CR/PR at 1.5, 3.1.

⁶ CR/PR at 4.1. Importers that responded to the Commission’s importer questionnaires reported TMFP imports accounting for 25.0 percent of nonsubject imports under HTS subheadings that included TMFPs and other products. However, other information on the record indicate that this figure understates the questionnaire responses’ coverage of nonsubject imports. *Id.* at 4.1 n.2.

⁷ CR/PR at 7.3-7.5. The Commission received questionnaire responses from five Chinese TMFP producers: Rypax Limited (when referring to its production in China, “Rypax China”), Clean Packaging Technology (Shenzhen) Co., LTD (“Clean Packaging”), Shanghai Yingzhengui Green Industrial Co., Ltd. (“Green Industrial”), Sabert (Zhongshan Limited) (“Sabert”), and Zhangzhou Huanlv Paper Packing Co LTD (“Zhangzhou Huanlv”). CR/PRat Table 7.2. The Commission also received responses from three Chinese TMFP resellers: Shenzhen Jujin Paper Packaging Co., Ltd (“Jujin Packaging”), G-Cove Technology Group Co. Limited (G-Cove”) and Sabert. *Id.* at Table 7.3. The Commission received questionnaire responses from four Vietnamese producers: Huanlv (Vietnam) Packaging Technology Limited Company (“Huanlv”), Honha Eco Pulp package Technology Viet Nam Co. Ltd (“Honha”), Vietnam Yuzhan Packaging Technology Company Limited (“Yuzhan”), and Rypax. CR/PR at Table 7.2. Yuzhan is also a reseller. *Id.* at Table 7.3.

⁸ See CR/PR at Table 7.1, notes.

⁹ 19 U.S.C. § 1677(4)(A).

the product.”¹⁰ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”¹¹

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.¹² Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”¹³ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹⁴ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.¹⁵ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁶ The

¹⁰ 19 U.S.C. § 1677(4)(A).

¹¹ 19 U.S.C. § 1677(10).

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

¹³ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. V. United States*, 949 F.3d 710, 715 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹⁴ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

¹⁵ *See, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁶ *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁷

B. Product Description

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

The merchandise subject to these investigations consists of thermoformed molded fiber products regardless of shape, form, function, fiber source, or finish. Thermoformed molded fiber products are formed with cellulose fibers, thermoformed using one or more heated molds, and dried/cured in the mold.

Thermoformed molded fiber products include, but are not limited to, plates, bowls, clamshells, trays, lids, food or foodservice contact packaging, and consumer or other product packaging.

Thermoformed molded fiber products are relatively dense, with a typical fiber density above 0.5 grams per cubic centimeter, and are generally characterized by relatively smooth surfaces. They may be derived from any virgin or recycled cellulose fiber source (including, but not limited to, those sourced from wood, woody crops, agricultural crops/byproducts/residue, and agricultural/industrial/other waste). They may have any weight, shape, dimensionality, design, or size, and may be bleached, unbleached, dyed, colored, or printed. They may include ingredients, additives, or chemistries to enhance functionality including, but not limited to, anti-microbial, anti-fungal, anti-bacterial, heat/flame resistant, hydrophobic, oleophobic, absorbent, or adsorbent.

Thermoformed molded fiber products may also be subject to other processing or treatments, including, but not limited to, hot or after pressing, die-cutting, punching, trimming, padding, perforating, printing, labeling, dying, coloring, coating, laminating, embossing, debossing, repacking, or denesting. Thermoformed molded fiber products subject to

¹⁷ *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also* S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

these investigations may also have additional design features, including, but not limited to, tab closures, venting, channeling, or stiffening.

Thermoformed molded fiber products remain covered by the scope of these investigations whether the subject product is encased by exterior packaging or whether the subject product forms the outer packaging for non-subject products. They also remain covered by the scope of these investigations whether imported alone, or in any combination of subject and non-subject merchandise (*e.g.*, a lid or cover of any type packaged with a molded fiber bowl, addition of any items to make the thermoformed molded fiber packaging suitable for end-use such as absorbent pads). When thermoformed molded fiber products are imported in combination with non-subject merchandise, only the thermoformed molded fiber products are subject merchandise.

Also excluded from the scope of this investigation are products covered by the scope of the antidumping and countervailing duty orders on paper plates from People's Republic of China, the Kingdom of Thailand, and the Socialist Republic of Vietnam.

Excluded from the scope of these investigations are thermoformed molded fiber products imported as packaging material that enclose and/or surround nonsubject merchandise prepackaged for final sale upon importation into the United States (*e.g.*, molded fiber packaging surrounding a cellular phone).

Thermoformed molded fiber products include thermoformed molded fiber products matching the above description that have been finished, packaged, or otherwise processed in a third country by performing finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the thermoformed molded fiber products. Examples of finishing, packaging, or other processing in a third country that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the thermoformed molded fiber products include, but are not limited to, hot

or after pressing, die-cutting, punching, trimming, padding, perforating, printing, labeling, dying, coloring, coating, laminating, embossing, debossing, repacking, or denesting.

Thermoformed molded fiber products are classified under subheadings 4823.70.0020 and 4823.70.0040, Harmonized Tariff Schedule of the United States (HTSUS). Imports may also be classified under subheadings 4823.61.0020, 4823.61.0040, 4823.69.0020, 4823.69.0040, 4823.90.1000, HTSUS. References to the HTSUS classification are provided for convenience and customs purposes, and the written description of the merchandise under investigation is dispositive.¹⁸

Molded fiber products are made with natural cellulosic or lignocellulosic fibers that come from various biomass resources such as wood, bamboo, agricultural crops (*e.g.*, wheat straw, rice straw, and hemp), or other agricultural and forest byproducts, residues, or wastes.¹⁹ Molded fiber products can be made from virgin or recycled fibers, or a mixture of both, and vary in size, shape, thickness, and fiber source.²⁰ The thermoforming process during production distinguishes TMFPs from other molded fiber products and imparts special characteristics to TMFPs.²¹ TMFPs are “thin-walled” compared to other molded fiber products, with a typical fiber density above 0.5 grams per cubic centimeter.²² TMFPs are primarily used as single-use food containers, although they may be used for other packaging as well.²³

C. Arguments of the Parties

Petitioner’s Arguments. Petitioner argues that the Commission’s traditional domestic like product factors support defining a single domestic like product consisting of all TMFPs

¹⁸ *Thermoformed Molded Fiber Products from the People’s Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 90 Fed. Reg. 46800, 46804 (Sept. 30, 2025); *Thermoformed Molded Fiber Products from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value*, 90 Fed. Reg. 46791, 46793-4 (Sept. 30, 2025); *Thermoformed Molded Fiber Products From the People’s Republic of China: Final Affirmative Countervailing Duty Determination*, 90 Fed. Reg. 46787, 46789-90 (Sept. 30, 2025); *Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination*, 90 Fed. Reg. 46805, 46807 (Sept. 30, 2025).

¹⁹ CR/PR at 1.17.

²⁰ CR/PR at 1.17-18.

²¹ CR/PR at 1.18.

²² CR/PR at 1.18.

²³ CR/PR at 1.18-19.

coextensive with the scope.²⁴ Petitioner argues there is a clear dividing line between out-of-scope transfer molded products (another type of molded fiber products (“other MFPS”)) and in-scope TMFPS.²⁵ Specifically, it argues that transfer molded products are made through different production processes, have different physical characteristics and end uses, and are sold through different channels of distribution at lower prices.²⁶

Respondent’s Arguments. World Centric argues the domestic like product definition should be expanded to include transfer molded products.²⁷ It contends that thermoformed molded and transfer molded products share the same natural fiber material inputs and most production steps, have overlapping end uses, and are reasonably interchangeable in foodservice packaging applications.²⁸

D. Analysis and Conclusion

Based on the record, we define a single domestic like product consisting of all TMFPS, coextensive with the scope.

1. Whether the Commission Should Define Multiple Domestic Like Products

In the preliminary phase of the investigations, the Commission defined a single domestic like product consisting of TMFPS, coextensive with Commerce’s scope of investigation.²⁹ Applying its traditional six-factor like product analysis, the Commission found that all TMFPS shared the same physical characteristics and uses, were manufactured in the same facilities by the same employees using the same production processes, and were sold through the same channels of distribution.³⁰ The Commission also found that producers and customers perceived all TMFPS as belonging to the same product category and that prices of TMFPS generally fell within a similar range and followed similar trends.³¹ Lastly, the Commission found that TMFPS are reasonably interchangeable in that they are used as containers or packaging in the foodservice industry.³²

The record in the final phase of the investigations does not contain any new information suggesting that the Commission should revisit whether to define multiple domestic like

²⁴ Petitioner’s Prehearing Br. at 2-8.

²⁵ Petitioner’s Prehearing Br. at 3-4 n.8.

²⁶ Petitioner’s Posthearing Br., Exh. 1 pp. 28-31.

²⁷ Petitioner’s Posthearing Br. at 2. *See also* Joint Respondents Comments on Draft Questionnaires, EDIS Doc. 842956 (Feb. 4, 2025) at 3-7.

²⁸ Petitioner’s Posthearing Br. at 2.

²⁹ *Preliminary Determinations*, USITC Pub. 5568 at 12-13.

³⁰ *Preliminary Determinations*, USITC Pub. 5568 at 9-13.

³¹ *Preliminary Determinations*, USITC Pub. 5568 at 9-13.

³² *Preliminary Determinations*, USITC Pub. 5568 at 11-12.

products. Accordingly, and in absence of any argument to the contrary, we again define a single domestic like product consisting of TMFPs, coextensive with the scope of the investigations.

2. Whether the Domestic Like Product Should Be Expanded

Over the course of this proceeding, parties have raised domestic like product arguments with respect to different product groupings. In their comments on draft questionnaires, World Centric and importer Eco-Products, PBC requested that the Commission gather information on an expanded domestic like product including out-of-scope molded fiber products, and paperboard.³³ The Commission collected information on an expanded domestic like product to include all other molded fiber products (“other MFPs”), but not paperboard. At the hearing and in its posthearing brief, World Centric argued for a more limited expansion of the domestic like product to include only transfer molded products; World Centric stated that its understanding is that the Commission’s collection of data for “other molded fiber products” are for transfer molded fiber products.³⁴ We accordingly address the traditional like product factors below to evaluate whether the domestic like product should be broadened to include transfer molded products using the available information on the record, which compares TMFPs with other MFPs.

Physical Characteristics and Uses. World Centric contends that both TMFPs and transfer molded products share the same natural fiber material inputs and have overlapping end uses.³⁵ Petitioner contends that TMFPs are much denser, moisture resistant, and smoother, making them more suitable for consumer-facing food contact applications than transfer molded

³³ Joint Respondents Comments on Draft Questionnaires (Feb. 4, 2025) at 3-4 (requesting the Commission collect information on expanded domestic like product including “non-thermoformed MFPs, {} i.e., transfer-molded fiber products; and paperboard”.

³⁴ World Centric’s Posthear Br. at 2; Exhibit 1, at 3-4; *see also* Joint Respondents Comments on Draft Questionnaires at 3-4 (requesting that the Commission expand the domestic like product definition to include “non-thermoformed MFPs, i.e., transfer-molded fiber products”). World Centric’s prehearing brief in these final phase investigations did not advocate expansion of the domestic like products, and addressed material injury solely in terms of TMFPs. World Centric’s Posthear. Br. at 2; Exhibit 1 at 3-4. We remind participants in our investigations that all arguments, particularly those related to threshold matters that implicate data collection such as the domestic like product definition, should be set forth as early as possible for full consideration by the Commission and no later than in a party’s prehearing brief per the Commission’s regulation at 19 C.F.R. 207.23 (“The prehearing brief should present a party’s case concisely and shall, to the extent possible, refer to the record and include information and arguments which the party believes relevant to the subject matter of the Commission’s determination under section 705(b) or section 735(b) of the Act”).

³⁵ World Centric’s Posthearing Br. at 2.

products.³⁶ Questionnaire responses of U.S. producers, U.S. importers, and purchasers are mixed, indicating that while there are some physical similarities between TMFPs and other MFPs, TMFPs tend to be a thicker product, have smoother textures with more defined and rigid shape, and are more fit for food packaging.³⁷ The raw materials used to make these products also may differ, with other molded fiber products generally made from raw materials that may not be considered food safe.³⁸ Their end uses reportedly differ, with TMFPs often used in “premium packaging, food service trays, and consumer goods where appearance and strength are important. Non-thermoformed products are more commonly used in protective packaging, industrial applications, or low-cost solutions where aesthetics are less critical.”³⁹ Market participants report that non-thermoformed products are not suitable for food contact applications, which is the primary end use for TMFPs.⁴⁰ Most U.S. producers and importers reported that TMFPs and other molded fiber products are only somewhat or never comparable in terms of physical characteristics and end uses, while purchasers were divided.⁴¹

Interchangeability. World Centric argues that TMFPs and other MFPs are “reasonably interchangeable in foodservice packaging applications.”⁴² Petitioner contends that there is limited interchangeability between the products.⁴³ The record indicates that TMFPs and other MFPs (including transfer molded products) can be interchangeable in some circumstances, but are not in others, particularly in certain food applications.⁴⁴ Most U.S. producers, U.S. importers, and purchasers reported that TMFPs and other MFPs are either never or only somewhat interchangeable.⁴⁵

Channels of Distribution. During the January 2022-March 2025 period of investigation (“POI”), domestic producers sold TMFPs primarily packaged for retail sale to end users, mostly in the foodservice industry, whereas domestic producers sold virtually all other MFPs to distributors.⁴⁶ *** reported that TMFPs and other MFPs are sold through different distribution

³⁶ Petitioner’s Posthearing Br. at Exhibit 1 p. 29.

³⁷ See CR/PR at Table D.2. In particular, purchasers reported that TMFPs often include additives for grease and water resistance, whereas other MFPs are not suitable for food applications. See CR/PR at D.15, Table D.3.

³⁸ CR/PR at Tables D.2, D.3.

³⁹ CR/PR at Table D.2.

⁴⁰ CR/PR at 2.1, Tables D.2, D.3.

⁴¹ See CR/PR at Table 1.8.

⁴² World Centric’s Posthear. Br. at 2.

⁴³ Petitioner’s Posthear. Br. at 2.

⁴⁴ See CR/PR at Tables D.2, D.3.

⁴⁵ See CR/PR at Table 1.8.

⁴⁶ See CR/PR at Table F.24.

channels because they serve different markets.⁴⁷ Half of responding U.S. producers reported that the channels of distribution for TMFPs and other MFPs are fully or mostly comparable and half reported they were somewhat or never comparable.⁴⁸ U.S. importer and purchaser responses were varied, but a majority indicated that both products are sold in similar channels.⁴⁹

Manufacturing Facilities, Production Processes, and Production Employees. World Centric contends that both products share “most” of the same production steps, while Petitioner contends that they are made in different facilities using different processes and employees.⁵⁰ TMFPs are dried and cured in the mold, using high heat and pressure, causing the water to evaporate within seconds and the fiber to be compressed into a very dense, strong, thin-walled shape with a smooth surface. In contrast, transfer molded products are taken out of the mold and hardened simply by losing moisture in an oven, with less densification and no heat/pressure “cure” step.⁵¹ Petitioner argues that due to this process, the final form of a transfer molded product is relatively thick but more porous and not as dense as a TMFP, while World Centric contends this difference is “primarily mechanical” and “does not fundamentally alter the fiber composition, density, or intended uses of the product.”⁵²

*** U.S. producers (***) produce both TMFPs and other MFPs.⁵³ While *** reported that manufacturing TMFPs and other MFPs are mostly comparable, that *** reported that TMFPs and other MFPs are never comparable, and *** reported that they are sometimes comparable because ***.⁵⁴

Although responses are mixed, the record generally indicates that TMFPs and other MFPs are made using different machinery and production processes.⁵⁵

Producer and Customer Perceptions. Most U.S. producers, importers, and purchasers reported that TMFPs and other MFPs are only somewhat or never comparable in terms of producer and customer perceptions.⁵⁶ Market participants generally perceive TMFPs and other

⁴⁷ See CR/PR at D.4.

⁴⁸ CR/PR at Table 1.8.

⁴⁹ See CR/PR at D.10, D.15-D.16, Table 1.8.

⁵⁰ World Centric’s Posthear. Br. at 2; Petitioner’s Posthear. Br. at Exh. 1 p. 28.

⁵¹ CR/PR at D.3, Table D.1. Petitioner’s Posthear. Br. at Exh. 1 pp. 1-28.

⁵² World Centric’s Posthear. Br. at Exh. 1 at 3. Petitioner’s Posthear. Br. at Exh. 1 p. 28.

⁵³ CR/PR at 3.1 n.1.

⁵⁴ CR/PR at Table D.1; U.S. Producer Questionnaire Responses at V-1.

⁵⁵ Petitioner’s Posthear. Br. at Exh. 1 p. 28; see also CR/PR at Table D.1. Nearly all U.S. producers and importers reported that TMFPs and other molded fiber products are only somewhat or never comparable in terms of manufacturing facilities, processes, and employees, while purchasers were divided between reporting fully and somewhat/never comparable. CR/PR at Table 1.8.

⁵⁶ See CR/PR at Table 1.8.

MFPs to be different products as other MFPs are typically not suitable for food contact applications and due to differences in appearance and structural properties.⁵⁷

Price. Market participants mostly reported that TMFPs are more expensive than other MFPs.⁵⁸ Most U.S. producers, importers, and purchasers reported that TMFPs and other MFPs are only somewhat or never comparable in terms of price.⁵⁹

Conclusion. While TMFPs and other MFPs do have some overlapping characteristics, the weight of evidence indicates significant differences. In particular, their physical characteristics appear to make other MFPs unfit for most food contact applications, which are the primary use for TMFPs. Customer perceptions appear to mirror this difference, and firms report that TMFPs have higher prices. The record also indicates that the products are made using different processes and equipment. Given the weight of evidence indicating clear dividing lines between TMFPs and transfer molded fiber products, we do not expand the domestic like product and define a single domestic like product consisting of all TMFPs, coextensive with the scope.

III. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁶⁰ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁶¹ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.⁶²

⁵⁷ CR/PR at Tables D.1–D.3.

⁵⁸ See CR/PR at Tables D.1–D.3.

⁵⁹ See CR/PR at Table 1.8.

⁶⁰ 19 U.S.C. § 1677(4)(A).

⁶¹ See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int’l Trade 1992), *aff’d without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331–32 (Ct. Int’l Trade 1989), *aff’d mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int’l Trade 1987).

⁶² The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

Petitioner argues that the Commission should define the domestic industry as all domestic producers of TMFPs.⁶³ Consistent with its proposed expanded domestic like product, World Centric argues that the domestic industry definition should be expanded to include producers of other MFPs.⁶⁴ Based on the Commission determination not to expand the domestic like product to include out-of-scope products, we also do not enlarge the domestic industry to include producers of other MFPs.

A. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁶⁵ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.⁶⁶

The record indicates that five domestic producers imported subject merchandise during the POI and are, therefore, subject to possible exclusion from the domestic industry under the

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

⁶³ Petitioner's Prehearing Br. at 8-9.

⁶⁴ World Centric's Posthear. Br. at Exh. 1 at 4.

⁶⁵ See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

⁶⁶ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and

related parties provision: ***.⁶⁷ One domestic producer, ***, also purchased subject imports during the POI.⁶⁸ In addition, U.S. producer *** is related to a producer and exporter of subject merchandise in China, and three U.S. producers, ***, also qualify as related parties because they are each related to an importer of subject merchandise.⁶⁹

1. Arguments of the Parties

Petitioner contends that each firm's ratio of imports to U.S. production *** over the POI and each imported due to ***.⁷⁰ Petitioner also contends that record evidence demonstrates that each company's primary interest lies in domestic production, and that there is no indication on the record that their inclusion would skew the domestic industry data. Therefore, the Petitioner argues that the Commission should again define the domestic industry as all US producers of TMFPs.⁷¹ World Centric did not address the issue of related parties.

2. Analysis and Conclusion

We discuss below whether appropriate circumstances exist to exclude any related party from the domestic industry.

. *** commenced domestic production of TMFPs in the *** and was the *** U.S. producer in 2024.⁷² It accounted for *** percent of total domestic production in 2023, *** percent of domestic production in 2024, and *** percent in January–March (“interim”) 2025.⁷³ ***'s subject imports from China totaled *** pounds in 2022, *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025, compared with domestic production of *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025.⁷⁴ The ratio of ***'s subject imports to its domestic production was *** percent in 2023, *** percent in 2024, and *** percent in interim 2025.⁷⁵ *** reported that its reason for importing subject merchandise during the POI was that it “.”⁷⁶ The firm reported capital expenditures totaling \$*** in 2022, \$*** in 2023,

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015), *aff'd*, 879 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁶⁷ CR/PR at Tables 3.10 to 3.14.

⁶⁸ CR/PR at Table 3.16.

⁶⁹ CR/PR at Table 3.2.

⁷⁰ Petitioner's Prehearing Br. at 9.

⁷¹ Petitioner's Prehearing Br. at 10.

⁷² CR/PR at Table 3.7. *** the petitions. *Id.* at Table 3.1.

⁷³ CR/PR at Table 3.7.

⁷⁴ CR/PR at Table 3.10. *** did not import TMFPs from Vietnam during the POI. *See id.*

⁷⁵ CR/PR at Table 3.10.

⁷⁶ CR/PR at Table 3.15.

\$*** in 2024, and \$*** in interim 2025, which it attributed to investments in equipment and facility modifications and expansions to begin TMFP production.⁷⁷ Its financial results throughout the POI were *** the domestic industry average.⁷⁸

The *** ratios of ***'s subject imports to domestic production throughout the POI reflect that it commenced domestic production during the period. During the POI, *** made substantial capital investments in its domestic production operations that totaled \$***, demonstrating a commitment to transitioning from importation to domestic production.⁷⁹ There is no evidence that *** imports of subject merchandise benefited its production operations to such an extent that its inclusion would skew the data for the rest of the domestic industry.⁸⁰ Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party in these investigations.⁸¹

***. *** was the *** domestic producer of TMFPs throughout the POI, accounting for *** percent of U.S. production in 2022, *** percent in 2023, *** percent in 2024, and ***

⁷⁷ CR/PR at Tables 6.5, 6.6. *** also reported research and development (“R&D”) expenses totaling \$*** in 2022, \$*** in 2023, \$*** in 2024, and \$*** in interim 2025. *Id.* at Table 6.7.

⁷⁸ *** registered operating losses of *** percent 2023, *** percent 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). CR/PR at Table 6.4. In comparison, the domestic industry’s average operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). *Id.*

⁷⁹ CR/PR at Table 6.5.

⁸⁰ *** is related to *** a U.S. importer. CR/PR at Table 3.2. There is no information to indicate that *** imported subject imports during the POI, and there is no evidence on the record that *** relationship to *** shielded it from import competition. *Id.* at Table 4.1. In addition, *** purchased subject imports from U.S. importer *** in 2024 and interim 2025. *Id.* at Table 3.16. A domestic producer that does not itself import subject merchandise, or does not share a corporate affiliation with an importer, may nonetheless be deemed a related party if it controls a predominant proportion of an importer’s purchases. See SAA at 858; see also e.g., *Forged Steel Fittings from India and Korea*, Inv. Nos. 701-TA-631 and 731-TA-1463-1464 (Final), USITC Pub. 5137 (November 2020). The ratio of ***'s purchases of U.S. imports from Vietnam imported by *** relative to ***'s U.S. imports from Vietnam in 2024 was low, at *** percent; however, the ratio increased to *** percent in interim 2025. *Id.* at Table 3.16. Given this mixed data, we find that even if *** exercised the requisite control over *** to implicate the related parties provision, appropriate circumstances do not exist to exclude *** , in particular as *** imports comprise a relatively small share of subject imports (***) percent and there is no indication that any control *** exercised over *** had the effect of shielding *** from subject import competition so as to skew the industry data.

⁸¹ Commissioner Kearns agrees that appropriate circumstances do not exist to exclude *** but under different reasoning. In his view, there is no reason to believe that its inclusion would mask injury. It never accounted for as much as even *** percent of total domestic production, and the data we are considering would not be materially different if the company is excluded.

percent in interim 2025.⁸² ***'s imports of subject merchandise from China totaled *** pounds in 2022, *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025 (compared to *** pounds in interim 2024).⁸³ In comparison, *** produced *** pounds of TMFPs in 2022, *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025 (compared to *** pounds in interim 2024).⁸⁴ The ratio of ***'s subject imports to its U.S. production was *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024).⁸⁵ *** reported importing subject merchandise during the POI to accommodate for temporary capacity reductions during equipment upgrades, because the domestic industry is incapable of producing certain products, and due to subject imports' price competitiveness for some products, ***.⁸⁶ *** made significant capital expenditures for its domestic production operations during the POI, \$*** in 2022 and \$*** in 2023.⁸⁷ Its profitability was *** the domestic industry average throughout the POI.⁸⁸

Because *** was the *** domestic producer and its ratio of subject imports to domestic production, albeit increasing over the course of the POI, remained relatively low, its principal interest appears to be domestic production. The record also does not indicate that *** imports of subject merchandise benefited its domestic production operations to an extent that its inclusion in the domestic industry would likely skew the domestic industry data or mask injury. To the contrary, while *** profitability was ***, it declined over the POI, as did its production and capacity utilization⁸⁹ and *** reported producing ***, product categories which directly compete with subject imports.⁹⁰ Because of *** in the market, and the declines in its performance over the POI, its exclusion from the domestic industry could skew the domestic

⁸² CR/PR at Table 3.7. *** on the petitions. *Id.* at Table 3.1.

⁸³ CR/PR at Table 3.11. *** did not import subject merchandise from Vietnam during the POI. *Id.*

⁸⁴ CR/PR at Table 3.11.

⁸⁵ CR/PR at Table 3.11.

⁸⁶ CR/PR at Table 3.15. *** stated that it imported *** from China during the POI because no U.S. producer can currently produce them. *Id.* It also reported importing "****." *Id.*

⁸⁷ CR/PR at Table 6.5. *** did not report any capital expenditures from 2024 or interim 2025. *Id.* It also reported R&D expenses of \$*** in 2022 and \$*** in 2023. *Id.* at Table 6.6. *** did not report any R&D expenses in 2024 or interim 2025. *Id.*

⁸⁸ ***'s operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). CR/PR at Table 6.4. In comparison, the domestic industry's average operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). *Id.*

⁸⁹ CR/PR at Tables 3.7 and 6.4.

⁹⁰ Producer Questionnaire Response of *** at II-10.

industry data or mask injury to the domestic industry data.⁹¹ Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

. *** was the *** domestic producer throughout the POI, accounting for *** percent of U.S. production in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025.⁹² ***'s subject imports from China totaled *** pounds in 2022, *** pounds in 2023, and *** pounds in 2024, *** pounds in interim 2024, and *** pounds in interim 2025.⁹³ Its subject imports from Vietnam totaled *** pounds in 2022 and *** pounds in 2023.⁹⁴ In comparison, *** produced *** pounds in 2022, and *** pounds in 2023, *** pounds in 2024, *** pounds in interim 2024, and *** pounds in interim 2025.⁹⁵ The ratio of ***'s subject imports from China and Vietnam to its U.S. production was *** percent in 2022, *** percent in 2023, *** percent in 2024, *** percent in interim 2024, and *** percent in interim 2025.⁹⁶ *** reported importing subject merchandise during the POI due to capacity and product mix limitations.⁹⁷ It made capital expenditures for its domestic production operations of \$ in 2022, \$*** in 2023, and \$*** in 2024, \$*** in interim 2024, and \$*** in interim 2024.⁹⁸ Its financial profitability was *** the domestic industry average throughout the POI.⁹⁹

*** is ***. Although its subject imports decreased over the POI, its ratio of subject imports to domestic production remained high. However, ***'s principal interest appears to be domestic production, given its capital expenditures and its report that ***. Further, the record does not indicate that its domestic production operations benefited from its subject imports or affiliation with importers to the extent that its inclusion in the domestic industry would skew

⁹¹ For example, with *** included the domestic industry loses *** percentage points of market share from 2022 to 2024 and its COGS to net sales ratio increases by *** percentage points during this period, and with *** excluded the domestic industry loses just *** of market share and its COGS to net sales ratio increases by *** percentage points.

⁹² CR/PR at Table 3.7. *** on the petitions. *Id.* at Table 3.1.

⁹³ CR/PR at Table 3.12.

⁹⁴ CR/PR at Table 3.12

⁹⁵ CR/PR at Table 3.12.

⁹⁶ CR/PR at Table 3.12.

⁹⁷ CR/PR at Table 3.14. *** stated, "****." *Id.*

⁹⁸ CR/PR at Table 6.5. *** did not report any R&D expenses during the POI. *Id.* at Table E-4.

⁹⁹ ***'s operating margins were *** percent in 2022, *** percent in 2023, and *** percent in 2024, *** percent in interim 2024, and *** percent in interim 2025. CR/PR at Table 6.4. In comparison, the domestic industry's average operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). *Id.*

industry data or mask injury.^{100 101} Indeed, although ***'s profitability was above average throughout the POI, it generally declined between 2022 and 2024 and *** produced ***, product categories in which large volumes of subject imports are present.¹⁰² Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

. *** was the *** domestic producer throughout the POI, accounting for *** percent of U.S. production in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025.¹⁰³ ***'s subject imports from China totaled *** pounds in 2022, *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025 (compared to *** pounds in interim 2024).¹⁰⁴ In comparison, *** produced *** pounds of TMFPs in each of 2022, 2023, and 2024, *** pounds in interim 2024, and *** pounds in interim 2025.¹⁰⁵ The ratio of ***'s subject imports to its U.S. production was *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025, as compared to *** percent interim 2024.¹⁰⁶ *** reported importing subject merchandise during the POI due to demand being higher than its capacity.¹⁰⁷ *** made significant capital expenditures in its domestic production operations during the POI: \$ in 2022, \$*** in 2023, \$*** in 2024, \$*** in interim 2024, and \$*** in interim 2025.¹⁰⁸ Its profitability *** over the POI, and was sometimes higher and sometimes lower than the domestic industry average.¹⁰⁹

¹⁰⁰ For example, with *** included the domestic industry loses *** percentage points of market share from 2022 to 2024 and its COGS to net sales ratio increases by *** percentage points during this period, and with *** excluded the domestic industry loses *** percentage points of market share and its COGS to net sales ratio increases by *** percentage points.

¹⁰¹ *** is related to three U.S. importers (***). CR/PR at Table 3.2.

¹⁰² *** U.S. Producer Questionnaire Response at II-10; CR/PR at Table 4.7.

¹⁰³ CR/PR at Table 3.7. *** on the petitions. *Id.* at Table 3.1.

¹⁰⁴ CR/PR at Table 3.12. *** did not import subject merchandise from Vietnam during the POI. *Id.*

¹⁰⁵ CR/PR at Table 3.12. *** did not import subject merchandise during interim 2025.

¹⁰⁶ CR/PR at Table 3.12.

¹⁰⁷ CR/PR at Table 3.14.

¹⁰⁸ CR/PR at Table 6.5. *** attributed its capital expenditures to a "capacity expansion projection." *Id.* at Table 6.5. *** also reported R&D expenses totaling \$*** in 2022 and \$*** in 2023. *Id.* It did not report any R&D expenses in 2024 or interim period 2025. *Id.*

¹⁰⁹ ***'s operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). CR/PR at Table 6.4. In comparison, the domestic industry's average operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). *Id.*

*** ratio of subject imports to domestic production was high but declined throughout the POI, reaching *** percent in interim 2025. It reported that it imported subject merchandise because of capacity limitations, and it made capital expenditures totaling \$*** during the POI in an effort to expand its capacity.¹¹⁰ Its high capacity utilization rate throughout the POI – one of the highest among all domestic producers – provides further support for its assertion that it imported subject merchandise because of capacity limitations.¹¹¹ Accordingly, ***'s principal interest appears to be domestic production. There is also no evidence on the record that ***'s imports of subject merchandise benefited its production operations to an extent such that its inclusion in the domestic industry would mask injury.¹¹² Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** was the *** U.S. producer in 2024.¹¹³ *** accounted for *** percent of U.S. production in 2022, *** percent in 2023, and *** percent in 2024, *** percent in interim 2024, and *** percent in interim 2025.¹¹⁴ ***'s subject imports from China were *** pounds in 2022, *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025 (compared to *** pounds in interim 2024).¹¹⁵ In comparison, *** produced *** pounds of TMFPs in 2022, *** pounds in 2023, *** pounds in 2024, and *** pounds in interim 2025 (compared to *** pounds in interim 2024).¹¹⁶ The ratio of ***'s subject imports to its U.S. production was *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024).¹¹⁷ *** reported importing subject merchandise during the POI ***.¹¹⁸ *** made significant capital expenditures in its domestic production operations during

¹¹⁰ We note, however, that ***'s reported installed and practical capacity, which remained constant throughout the POI, do not reflect any capacity expansion. See CR/PR at Table 3.7; U.S. Producer Questionnaire Response of *** at II-3a. ***'s reported practical capacity was *** pounds in 2022, 2023, and 2024, with a practical capacity of *** pounds in both interim 2023 and interim 2024. *Id.*

¹¹¹ ***'s capacity utilization was *** percent in 2022, *** percent in 2023, *** percent in 2024, *** percent in interim 2024, and *** percent in interim 2025. CR/PR at Table 3.7.

¹¹² ***'s financial performance deteriorated over the POI, with its operating income margin declining from *** percent in 2022 to *** percent in 2024. CR/PR at Table 6.4.

¹¹³ CR/PR at Table 3.7.

¹¹⁴ CR/PR at Table 3.7. *** the petitions. *Id.* at Table 3.1.

¹¹⁵ CR/PR at Table 3.12. *** did not import subject merchandise from Vietnam during the POI. *Id.*

¹¹⁶ CR/PR at Table 3.13.

¹¹⁷ CR/PR at Table 3.13.

¹¹⁸ CR/PR at Table 3.14.

the POI: \$*** in 2022, \$*** in 2023, \$*** in 2024, \$*** in interim 2024, and \$*** in interim 2025.¹¹⁹ Its profitability was *** compared the domestic industry average for the entire POI.¹²⁰

Although *** ratio of subject imports to domestic production was high, it declined over the POI as *** reported that it imported subject merchandise while it was in the ***, and it made capital expenditures totaling \$*** during the POI in an effort to do so.¹²¹ Its significant capital expenditures over the POI together with its increasing capacity utilization rate over the POI and incrementally decreasing subject import quantities support the conclusion that its importations were aimed at transitioning production to the United States.¹²² Accordingly, ***'s principal interest appears to be domestic production. There is also no evidence on the record that ***'s affiliation with a subject foreign producer or its imports of subject merchandise shielded it from subject import competition or otherwise benefited its domestic production operations such that its inclusion in the domestic industry would skew industry data. Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

For the above reasons, and in the absence of any argument to the contrary, we find that appropriate circumstances do not exist to exclude any producer from the domestic industry pursuant to the related parties provision. Accordingly, consistent with our definition of the domestic like product, we define the domestic industry as all domestic producers of TMFPs.

IV. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.¹²³ The statute further provides that subject imports from a single country which comprise less than

¹¹⁹ CR/PR at Table 6.5. *** attributed its capital expenditures to “manufacturing equipment, facility infrastructure, tooling”. *Id.* at Table 6.5.

¹²⁰ ***'s operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). CR/PR at Table 6.4. In comparison, the domestic industry's average operating margins were *** percent in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025 (compared to *** percent in interim 2024). *Id.*

¹²¹ CR/PR at Table 6.5.

¹²² ***'s capacity utilization was *** percent in 2022, *** percent in 2023, *** percent in 2024, *** percent in interim 2024, and *** percent in interim 2025. CR/PR at Table 3.7.

¹²³ 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

three percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.^{124 125}

During the 12-month period preceding filing of the petition (October 2023–September 2024), subject imports from China accounted for *** percent of total imports of TMFPs, and subject imports from Vietnam accounted for *** percent of total imports of TMFPs.¹²⁶ Because subject imports from each subject country clearly exceed the three percent negligibility threshold, we find that imports from both China and Vietnam subject to the antidumping and countervailing duty investigations are not negligible.

V. Cumulation

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

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

¹²⁴ 19 U.S.C. § 1677(24)(A)(ii).

¹²⁵ Petitioner argues that subject imports from all subject countries are not negligible. Petitioner's Prehearing Br. at 24-26. Respondents do not address the issue.

¹²⁶ CR/PR at Table 4.4. The volume of imports from each subject country are the same for both the relevant antidumping and countervailing duty investigations.

- (4) whether the subject imports are simultaneously present in the market.¹²⁷

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.¹²⁸ Only a “reasonable overlap” of competition is required.¹²⁹

A. Arguments of the Parties

Petitioner’s Arguments. Petitioner argues that cumulation is mandatory in these investigations.¹³⁰ It asserts that the petitions for both China and Vietnam were filed on the same day, that all subject imports are fungible with each other and the domestic like product and sold through similar distribution channels in overlapping geographic markets, and that there is a reasonable overlap in competition between and among subject imports from China and Vietnam and the domestic like product.¹³¹

Respondent’s Arguments. World Centric did not address cumulation.

B. Analysis and Conclusion

We consider subject imports from China and Vietnam on a cumulated basis because the statutory criteria for cumulation are satisfied. As an initial matter, Petitioner filed the antidumping and countervailing duty petitions with respect to both countries on the same day, October 8, 2024.¹³² The record also supports finding a reasonable overlap of competition

¹²⁷ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff’d*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int’l Trade), *aff’d*, 859 F.2d 915 (Fed. Cir. 1988).

¹²⁸ See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹²⁹ The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”)).

¹³⁰ Petition at 20; Petitioner’s Prehearing Br. at 11-12.

¹³¹ Petition at 20–22; Petitioner’s Prehearing Br. at 11-14; Petitioner’s Posthear. Br. at 4-5.

¹³² None of the statutory exceptions to cumulation set forth in section 771(7)(G)(ii) of the Tariff Act apply. We observe that these investigations involve dumping and subsidy allegations regarding TMFPs from both China and Vietnam. Consequently, any decision to cumulate imports from all subject sources in these investigations will involve “cross-cumulating” dumped imports with subsidized imports. The Commission has previously explained why it is continuing its longstanding practice of cross-cumulating. See *Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531–532 and 731-TA-1270–1273 (Final), USITC Pub. 4604 at 9–11 (Apr. 2016).

between subject imports from both countries, and between subject imports from each source and the domestic like product, for the reasons discussed below.

Fungibility. Although record evidence is mixed, the information on the record indicates that domestically produced TMFPs and imports of TMFPs from each subject country are generally fungible. Almost all responding domestic producers reported that subject imports from each subject country were always or frequently interchangeable with each other as well as with domestically produced TMFPs.¹³³ Subject importers' and purchasers' responses were more mixed but the vast majority reported that they are at least sometimes interchangeable.¹³⁴

The record also shows that both the domestic industry's U.S. shipments of the domestic like product and the responding importers' U.S. shipments of subject imports from China and Vietnam consisted of substantial volumes of each of the TMFP types that account for the

¹³³ CR/PR at Table 2.19. For domestically produced TMFPs and subject imports from China, seven U.S. producers rated the products as always interchangeable, one producer rated the products as frequently interchangeable, and one producer rated the products as never interchangeable. *Id.*

For domestically produced TMFPs and subject imports from Vietnam, six U.S. producers rated the products as always interchangeable, one producer rated the products as frequently interchangeable, and one producer rated the products as never interchangeable. *Id.*

For subject imports from China and Vietnam, six U.S. producers rated the products as always interchangeable, one producer rated the products as frequently interchangeable, and one producer rated the products as never interchangeable. *Id.*

¹³⁴ CR/PR at Tables 2.20, 2.21. For domestically produced TMFPs and subject imports from China, 13 importers rated the products as always interchangeable, five importers rated the products as frequently interchangeable, 12 importers rated the products as sometimes interchangeable, and three importers rated the products as never interchangeable. *Id.* at Table 2.20. Seven purchasers rated the products as always interchangeable, six purchasers rated the products as frequently interchangeable, eight purchasers rated the products as sometimes interchangeable, and one purchaser rated the products as never interchangeable. *Id.* at Table 2.21.

For domestically produced TMFPs and subject imports from Vietnam, seven importers rated the products as always interchangeable, four importers rated the products as frequently interchangeable, ten importers rated the products as sometimes interchangeable, and two importers rated the products as never interchangeable. *Id.* at Table 2.20. Five purchasers rated the products as always interchangeable, five purchasers rated the products as frequently interchangeable, five purchasers rated the products as sometimes interchangeable, and one purchaser rated the products as never interchangeable. *Id.* at Table 2.21.

For subject imports from China and Vietnam, seven importers rated the products as always interchangeable, seven importers rated the products as frequently interchangeable, ten importers rated the products as sometimes interchangeable, and two importers rated the products as never interchangeable. *Id.* at Table 2.20. Five purchasers rated the products as always interchangeable, five purchasers rated the products as frequently interchangeable, four purchasers rated the products as sometimes interchangeable, and zero purchasers rated the products as never interchangeable. *Id.* at Table 2.21.

largest shares of apparent consumption: round plates, clamshell containers, bowls, and trays, which collectively accounted for *** percent of total U.S. shipments of TMFPs in 2024.¹³⁵

In response to questions concerning how often differences other than price were significant in sales of TMFPs from different sources, most domestic producers reported that there are never or only sometimes significant differences other than price between products from all country pairs.¹³⁶ Subject importers' responses were mixed on whether there were significant non-price differences.¹³⁷ In contrast, the majority of purchasers reported there were always or frequently significant differences other than price between domestically produced products and subject imports.¹³⁸

¹³⁵ CR/PR at Table 4.7. In 2024, domestic producers shipped *** pounds of round plates, *** pounds of clamshell containers, *** pounds of bowls, and *** pounds of trays. *Id.* With respect to subject merchandise from China, importers shipped *** pounds of round plates, *** pounds of clamshell containers, *** pounds of bowls, and *** pounds of trays. *Id.* With respect to subject merchandise from Vietnam, importers shipped *** pounds of round plates, *** pounds of clamshell containers, *** pounds of bowls, and *** pounds of trays. *Id.* Accordingly, shipments of domestically produced TMFPs and subject imports overlapped in the four main product categories. *Id.*

¹³⁶ CR/PR at Table 2.22. Five of nine producers reported that there are never significant differences other than price for domestic like product and products from China and/or Vietnam. *Id.*

¹³⁷ CR/PR at Table 2.23. For domestically produced TMFPs and subject imports from China, ten importers reported that there are always significant differences other than price, eight importers reported that there are frequently significant differences other than price, eleven importers reported that there are sometimes significant differences other than price, and four importers reported that there are never significant differences other than price. *Id.*

For domestically produced TMFPs and subject imports from Vietnam, four importers reported that there are always significant differences other than price, five importers reported that there are frequently significant differences other than price, ten importers reported that there are sometimes significant differences other than price, and three importers reported that there are never significant differences other than price. *Id.*

For subject imports from China and Vietnam, two importers reported that there are always significant differences other than price, six importers reported that there are frequently significant differences other than price, nine importers reported that there are sometimes significant differences other than price, and four importers reported that there are never significant differences other than price. *Id.*

¹³⁸ CR/PR at Table 2.24. For domestically produced TMFPs and subject imports from China, 13 purchasers reported that there are always significant differences other than price, seven purchasers reported that there are frequently significant differences other than price, one purchaser reported that there are sometimes significant differences other than price, and two purchasers reported that there are never significant differences other than price. *Id.*

For domestically produced TMFPs and subject imports from Vietnam, nine purchasers reported that there are always significant differences other than price, five purchasers reported that there are frequently significant differences other than price, and one purchaser reported that there are never significant differences other than price. *Id.*

Channels of Distribution. During the POI, domestic producers sold TMFPs mainly packaged for retail sale for end users, with a substantial quantity to distributors as well.¹³⁹ Subject importers mostly sold their TMFPs to distributors, but also made sales to end users.¹⁴⁰

Geographic Overlap. U.S. producers reported shipping the domestic like product to all regions in the United States during the POI.¹⁴¹ Responding U.S. importers also reported shipping imports from each subject country to all regions in the United States during the POI.¹⁴² The majority of subject imports from China entered through ports located in the East and West, while substantial quantities of subject imports from China also entered through ports located in the North and South.¹⁴³ The majority of subject imports from Vietnam entered through ports located in the North and West.¹⁴⁴

Simultaneous Presence in Market. Domestically produced TMFPs and imports from each subject country were present in the U.S. market throughout the POI.¹⁴⁵

Conclusion. The record indicates that subject imports from China and Vietnam are generally fungible with the domestic like product and each other. Although there appear to be some differences in product offerings, some limits on interchangeability, and some differences with respect to certain purchasing factors other than price, the record shows that subject imports from both countries and the domestic like product consisted of overlapping product types, were reasonably fungible, were sold in similar channels of distribution and geographic markets, and were simultaneously present in the U.S. market throughout the POI. Because there appears to be a reasonable overlap of competition between and among subject imports from China and Vietnam and the domestic like product, we analyze subject imports from China

For subject imports from China and Vietnam, nine purchasers reported that there are always significant differences other than price, three purchasers reported that there are frequently significant differences other than price, one purchaser reported that there are sometimes significant differences other than price, and two purchasers reported that there are never significant differences other than price. *Id.*

¹³⁹ CR/PR at Table 2.2. U.S. producers sold *** percent of shipments to retailers/end users in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025. *Id.*

¹⁴⁰ CR/PR at Table 2.2. Subject importers sold *** percent of products from both subject sources to distributors in 2022, *** percent in 2023, *** percent in 2024, and *** percent in interim 2025. *Id.*

¹⁴¹ CR/PR at Table 2.3.

¹⁴² CR/PR at Table 4.9.

¹⁴³ CR/PR at Table 4.9.

¹⁴⁴ CR/PR at Table 4.9.

¹⁴⁵ CR/PR at 4.21, Tables 4.10, 4.11, 5.3, 5.4, 5.5, 5.7. Specifically, domestically produced TMFPs and subject imports from China and Vietnam were sold in the U.S. market every quarter of the POI and subject imports from China and Vietnam entered the U.S. market during every month of the POI (based on HTS categories which include TMFPs and out-of-scope merchandise). *Id.*

and Vietnam on a cumulated basis in determining whether there is a reasonable indication of material injury by reason of subject imports.

VI. Material Injury by Reason of Subject Imports

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

A. Legal Standard

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.¹⁴⁶ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.¹⁴⁷ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”¹⁴⁸ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.¹⁴⁹ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁵⁰

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,¹⁵¹ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.¹⁵² In identifying a

¹⁴⁶ 19 U.S.C. §§ 1671d(b), 1673d(b).

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

¹⁴⁸ 19 U.S.C. § 1677(7)(A).

¹⁴⁹ 19 U.S.C. § 1677(7)(C)(iii).

¹⁵⁰ 19 U.S.C. § 1677(7)(C)(iii).

¹⁵¹ 19 U.S.C. §§ 1671d(b), 1673d(b).

¹⁵² *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’d*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.¹⁵³

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.¹⁵⁴ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.¹⁵⁵ Nor does

¹⁵³ The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

¹⁵⁴ SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

¹⁵⁵ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not

the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.¹⁵⁶ It is clear that the existence of injury caused by other factors does not compel a negative determination.¹⁵⁷

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”¹⁵⁸ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”¹⁵⁹ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”¹⁶⁰

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

¹⁵⁶ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

¹⁵⁷ *See Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

¹⁵⁸ *Mittal Steel*, 542 F.3d at 876,78; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

¹⁵⁹ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

¹⁶⁰ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

evidence standard.¹⁶¹ Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.¹⁶²

B. Conditions of Competition

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

1. Demand Conditions

Demand for TMFPs is largely driven by demand for eco-sustainable containers and packaging products, primarily in the food service industry.¹⁶³ The record indicates that increasing environmental awareness around single-use plastics and related government actions have increased demand for TMFPs.¹⁶⁴ World Centric contends that there is a limit to the premium customers will pay for environmentally friendly products.¹⁶⁵ It argues that customers can and do replace TMFPs with other, cheaper, products.¹⁶⁶

Most firms reported that U.S. demand for TMFPs steadily increased or fluctuated upward since the beginning of the POI.¹⁶⁷ Other record evidence suggests “soaring” and “surging” demand for molded fiber products in recent years.¹⁶⁸ Moreover, demand is expected to continue to increase. Market research indicates that TMFP demand is expected to grow at the highest rate within the overall MFPs market in the next decade.¹⁶⁹

¹⁶¹ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

¹⁶² *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

¹⁶³ CR/PR at 2.9.

¹⁶⁴ CR/PR at 2.9. *See, e.g.*, Purchaser Questionnaire Response of *** at III-5 (reporting that legislation has driven demand due to foam and other material bans).

¹⁶⁵ World Centric's Prehear. Br. at 13; World Centric's Posthear. Br. at 5.

¹⁶⁶ World Centric's Prehear. Br. at 13.

¹⁶⁷ CR/PR at Table 2.6. Six U.S. producers, 17 importers and ten purchasers reported that domestic demand steadily increased over the POI, while one U.S. producer, ten importers, and five purchasers reported it fluctuated up. *Id.* *See also* Purchaser Questionnaire Response of *** at III-5 (reporting that “{c}onsumer demand has increased somewhat and there has been a{n} increase in localized requirements for use of substantiable materials like TMFPs.”); Purchaser Questionnaire Response of *** at III-5 (reporting demand fluctuating upward due to the industry's focus on sustainability, plastic/foam bans, and product quality benefits of molder fiber).

¹⁶⁸ Petitioner's Prehear. Br. at 15 n.63 and Exh. 3.

¹⁶⁹ Petitioner's Prehear. Br. at 15 and Exh. 3.

Four of nine U.S. producers, 28 of 40 importers, and 13 of 24 responding purchasers indicated that the market was not subject to business cycles.¹⁷⁰ Of the firms that did report the existence of business cycles, some firms reported some cyclicalities in demand, including lower summer demand from schools, higher demand in warmer months due to increased outdoor dining, and higher demand around the fall holidays.¹⁷¹

Apparent U.S. consumption of TMFPs remained essentially flat between 2022, at *** pounds, and 2023, at *** pounds, and then increased to *** pounds in 2024, for an overall increase of *** percent during the POI. Apparent U.S. consumption of *** pounds of TMFPs in interim 2025 was *** percent lower than apparent U.S. consumption of *** pounds in interim 2024.¹⁷²

2. Supply Conditions

The domestic industry was the *** supply source for the U.S. market during the POI.¹⁷³ The industry's share of apparent U.S. consumption declined from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall decline of *** percentage points.¹⁷⁴ However, its share of *** percent in interim 2025 was *** percentage points higher than its *** percent share in interim 2024.¹⁷⁵

The domestic industry is made up of nine U.S. producers, with some being long-standing participants in the market, and others more recent entrants. Huhtamaki, Reynolds, and Pactiv are considered "established" producers of TMFP and generally drive the trends of the industry as they account for the vast majority of U.S. producers' capacity and production.¹⁷⁶ We note that among the three established and largest U.S. producers, *** is the largest when measuring production and net sales, with the industry's aggregated financial data largely reflecting its operations from 2022 to March 2025. The remaining six smaller companies, Dart, Genera, Kanbol, Inc. ("Kanbol"), Sabert, Tekni-Plex, and Tellus, are considered "startup" or "newer" U.S. producers. For the purpose of our analyses, we will refer to them collectively as the "newer producers." Three of these recent entrants (***) started TMFP operations during the period

¹⁷⁰ CR/PR at 2.9.

¹⁷¹ CR/PR at 2.9.

¹⁷² CR/PR at Tables 4.11 & C.1. We note that due to the level of coverage of U.S. importer questionnaire responses, in particular with respect to subject imports from China and nonsubject imports, apparent U.S. consumption (which is the summation of U.S. importers' and U.S. producers' U.S. shipments) may be understated.

¹⁷³ CR/PR at Tables 4.11 & C.1.

¹⁷⁴ CR/PR at Tables 4.11 & C.1.

¹⁷⁵ CR/PR at Tables 4.11 & C.1.

¹⁷⁶ See CR/PR at 3.9 n.4.

examined, while the others started production within a few years of the POI and/or substantially increased capacity during the POI.¹⁷⁷

During the POI, domestic producers experienced some production curtailments, and one reported a prolonged shutdown.¹⁷⁸ *** reported curtailing production to manage growing inventory levels several times throughout the POI, and *** reported idling portions of its production during March 2023 to June 2025.¹⁷⁹ ***¹⁸⁰ *** also reported ***.¹⁸¹ Several other U.S. producers announced expansions and acquisitions during the POI.¹⁸² *** started production of TMFP *** at its *** facility and commenced TMFP production at its *** facility at the end of 2024.¹⁸³ *** began production at its new plant in the beginning of 2022.¹⁸⁴ It added four new production machines in mid-2023 and another ten in mid-2024.¹⁸⁵ Startup *** commenced minimal production in interim 2024.¹⁸⁶

The domestic industry's practical TMFP capacity increased from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024, for an overall increase of *** percent.¹⁸⁷ The domestic industry's practical capacity of *** pounds in interim 2025 was *** percent larger than its practical capacity of *** pounds in interim 2024.¹⁸⁸ Its practical capacity utilization rate decreased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points.¹⁸⁹ Its practical capacity utilization rate of *** percent in interim 2025 was *** percentage points lower than its capacity utilization rate of *** percent in interim 2024.¹⁹⁰

The established producers' practical TMFP capacity was *** pounds in 2022, *** pounds in 2023, and *** pounds in 2024, an overall increase of *** pounds (*** percent).¹⁹¹ However, as their production declined by *** pounds from 2022 to 2024, their practical capacity

¹⁷⁷ CR/PR at 6.1 n.5.

¹⁷⁸ CR/PR at Table 3.4.

¹⁷⁹ CR/PR at Table 3.4. *** and *** attribute the production curtailments they suffered during the POI to price competition and lost sales to subject imports. *Id.*

¹⁸⁰ CR/PR at Table 3.4.

¹⁸¹ CR/PR at Table 3.4.

¹⁸² CR/PR at Table 3.4.

¹⁸³ CR/PR at Table 3.4.

¹⁸⁴ CR/PR at Table 3.4.

¹⁸⁵ CR/PR at Table 3.4.

¹⁸⁶ CR/PR at Table 3.4. *** reported, "****." *Id.*

¹⁸⁷ CR/PR at Tables 3.5 & C.1.

¹⁸⁸ CR/PR at Tables 3.5 & C.1.

¹⁸⁹ CR/PR at Tables 3.5 & C.1.

¹⁹⁰ CR/PR at Tables 3.5 & C.1.

¹⁹¹ CR/PR at Tables 3.7 & C.1.

utilization rate decreased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points.¹⁹² On the other hand, the newer producers' practical capacity increased from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024, for a substantial overall increase of *** pounds (*** percent).¹⁹³ As their production increased by only *** pounds, their capacity utilization did not keep pace and fell from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points, leaving significant unused capacity.¹⁹⁴

Cumulated subject imports were the *** supply source for the U.S. market during the POI.¹⁹⁵ Subject imports' share of apparent U.S. consumption increased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall increase of *** percentage points.¹⁹⁶ Cumulated subject imports' share of apparent U.S. consumption of *** percent in interim 2025 was *** percentage points lower than their share of *** percent in interim 2024.¹⁹⁷

Nonsubject imports were the *** supply source for the U.S. market during the POI.¹⁹⁸ Their share of apparent U.S. consumption remained relatively flat between 2022 and 2024, increasing from *** percent in 2022 to *** percent in 2023 and then decreasing back to *** percent in 2024, for an overall decrease of *** percentage points.¹⁹⁹ Nonsubject imports' share of apparent U.S. consumption of *** percent in interim 2025 was *** percentage points higher than their *** percent share in interim 2024.²⁰⁰ The largest sources of nonsubject imports during the POI were Canada, Mexico, Cambodia, and Taiwan.²⁰¹

No domestic producer reported experiencing supply constraints during the POI.²⁰² Most purchasers reported that they had not experienced supply constraints from domestic producers during the POI, and the frequency with which purchasers did report supply constraints from the domestic industry declined from 2022 to pre-petition 2024.²⁰³ A majority of purchasers reported that there were no product availability issues (based on grades, types, sizes, or

¹⁹² CR/PR at Tables 3.7 & C.1.

¹⁹³ CR/PR at Tables 3.7 & C.1.

¹⁹⁴ CR/PR at Tables 3.7 & C.1.

¹⁹⁵ CR/PR at Tables 4.11 & C.1.

¹⁹⁶ CR/PR at Tables 4.11 & C.1.

¹⁹⁷ CR/PR at Tables 4.11 & C.1.

¹⁹⁸ CR/PR at Tables 4.11 & C.1.

¹⁹⁹ CR/PR at Tables 4.11 & C.1.

²⁰⁰ CR/PR at Tables 4.11 & C.1.

²⁰¹ CR/PR at 2.7.

²⁰² CR/PR at 2.7, Table 2.5.

²⁰³ CR/PR at 2.7, Table 2.5. Purchaser *** reported supply chain disruptions early in the POI following the COVID-19 pandemic. *Id.*

customizations) of TMFPs,²⁰⁴ although some reported being placed on allocation or having their orders refused by the domestic industry.²⁰⁵ Purchasers that did report lack of availability of certain product types from the domestic industry indicated that there was limited availability of oil-resistant TMFP food containers, and that both subject and nonsubject producers provided a wider array of product options that were not available in the United States, including white products, and that customization options from domestic producers were limited.²⁰⁶ Most responding importers (27 of 40) reported that they had not experienced supply constraints during the POI.²⁰⁷ The importers that did report having experienced supply constraints reported that they occurred with respect to both the domestic like product and subject imports, and attributed those issues to shipping costs and delays, port congestion, an unanticipated spike in demand, overordering by suppliers, delayed deliveries and declined orders from domestic producers, and customers being put on allocation.²⁰⁸

3. Substitutability and Other Conditions

Based on the record in these investigations, we find that there is a moderate-to-high degree of substitutability between cumulated subject imports and domestically produced TMFPs.²⁰⁹ Primary factors contributing to this level of substitutability are similarities between domestically produced TMFPs and TMFPs imported from subject countries, quality and consistency, compostability certifications, limited purchaser preference for particular countries of origin or producers, and market participants' views regarding interchangeability.²¹⁰ Differences in some factors, such as reported lack of availability of certain types of TMFPs from domestic producers and product range, lead times, and minimum order quantities, may limit substitutability to some extent.²¹¹ Almost all domestic producers and most purchasers reported that imports from each subject country were always or frequently interchangeable with domestically produced TMFPs. A slight majority of importers (18 of 33) reported that the domestic product is always or frequently interchangeable with subject imports from China,

²⁰⁴ CR/PR at 2.7-2.8. Fourteen of 25 purchasers reported no product availability issues.

²⁰⁵ CR/PR at 2.7. Purchaser *** reported that since ***. *Id.*

²⁰⁶ CR/PR at 2.8.

²⁰⁷ CR/PR at 2.7.

²⁰⁸ CR/PR at 2.7.

²⁰⁹ Commissioner Kearns finds that for products of the same general type, there is a high degree of substitutability.

²¹⁰ See CR/PR at 2.14, Tables 2.18, 2.19.

²¹¹ CR/PR at 2.14. Purchasers cited limited customization and finishing options (including limited color options, limited ability to print on certain parts of the products, and a limited ability for lamination), as well as some performance issues such as oil soaking through certain products. *Id.* at 2.14-15.

while just under half (11 of 23) said the domestic product is always or frequently interchangeable with subject imports from Vietnam.²¹²

The record indicates that price is an important factor in purchasing decisions for TMFPs, among other important factors.²¹³ Twenty-one purchasers ranked price as a top three most important purchasing factor, while 20 purchasers ranked quality and 16 purchasers ranked availability within their top three purchasing factors.²¹⁴ Questionnaire responses differed on the significance of factors other than price. Most domestic producers reported that there are never or only sometimes significant differences other than price between domestically produced TMFPs and subject imports.²¹⁵ Subject importers' responses were mixed on the frequency of significant non-price differences.²¹⁶ In contrast, the majority of purchasers

²¹² CR/PR at Tables 2.19, 2.20, 2.21.

²¹³ CR/PR at Table 2.12.

²¹⁴ CR/PR at Table 2.12. Seven purchasers each rated price, quality, and availability as the first-most important purchasing factor. *Id.*

²¹⁵ CR/PR at Table 2.22. Five of nine producers reported that there are never significant differences other than price for domestic like product and products from China and/or Vietnam. *Id.*

²¹⁶ CR/PR at Table 2.23. For domestically produced TMFPs and subject imports from China, ten importers reported that there are always significant differences other than price, eight importers reported that there are frequently significant differences other than price, 11 importers reported that there are sometimes significant differences other than price, and four importers reported that there are never significant differences other than price. *Id.*

For domestically produced TMFPs and subject imports from Vietnam, four importers reported that there are always significant differences other than price, five importers reported that there are frequently significant differences other than price, ten importers reported that there are sometimes significant differences other than price, and three importers reported that there are never significant differences other than price. *Id.*

For subject imports from China and Vietnam, two importers reported that there are always significant differences other than price, six importers reported that there are frequently significant differences other than price, nine importers reported that there are sometimes significant differences other than price, and four importers reported that there are never significant differences other than price. *Id.*

reported there were always or frequently significant differences other than price between domestically produced TMFPs and subject imports.^{217 218}

U.S. producers reported selling slightly less than half of their TMFPs through short-term contracts and slightly less than half through long-term contracts, while importers sold slightly less than half of their TMFPs through long-term contracts and just under one-third through spot sales.²¹⁹ Domestic producers and importers reported setting prices using price lists, contracts, and transaction-by-transaction negotiations.²²⁰

The primary raw material used in the production of TMFPs is fibrous pulp made from plant products, such as grasses, wheat straw, sugarcane bagasse, bamboo, wood, recycled fibers, hemp, rice straw, and other byproducts and wastes.²²¹ Producers may purchase pulp or produce their own.²²² Raw material costs represent the *** component of the domestic industry's cost of goods sold ("COGS"), with their share of COGS fluctuating within a range of *** to *** percent annually from 2022 to 2024.²²³ One U.S. producer reported using annual contracts indexed to raw material prices, and four responding U.S. producers reported using long-term contracts. None of the U.S. producers who reported using short-term contracts reported indexing prices to raw materials.²²⁴ Half of the responding importers reported fixing

²¹⁷ CR/PR at Table 2.24. For domestically produced TMFPs and subject imports from China, 13 purchasers reported that there are always significant differences other than price, seven purchasers reported that there are frequently significant differences other than price, one purchaser reported that there are sometimes significant differences other than price, and two purchasers reported that there are never significant differences other than price. *Id.*

For domestically produced TMFPs and subject imports from Vietnam, nine purchasers reported that there are always significant differences other than price, five purchasers reported that there are frequently significant differences other than price, and one purchaser reported that there are never significant differences other than price. *Id.*

For subject imports from China and Vietnam, nine purchasers reported that there are always significant differences other than price, three purchasers reported that there are frequently significant differences other than price, one purchaser reported that there are sometimes significant differences other than price, and two purchasers reported that there are never significant differences other than price. *Id.*

²¹⁸ In addition to factors limiting interchangeability discussed above, questionnaire responses pointed to lack of availability of certain types of TMFPs, differences in lead times, minimum order quantities, customization and finishing options, and performance issues. CR/PR at 2.14-2.15.

²¹⁹ CR/PR at 5.2, Table 5.2.

²²⁰ CR/PR at 5.2, Table 5.1. One importer reported using a cost-plus pricing methodology. *Id.*

²²¹ CR/PR at 5.1.

²²² CR/PR at 5.1.

²²³ CR/PR at Table 6.1. Raw materials' *** percent share of COGS in interim 2025 was *** percentage points higher than the *** percent share in interim 2023. *Id.*

²²⁴ CR/PR at 5.3.

prices for long-term contracts while the other half fixed both price and quantity with most not indexed to raw materials.²²⁵

A majority of responding U.S. producers, importers, and purchasers noted the existence of one or more substitutes for TMFPs, including plastics, paper, aluminum, and mineral-filled polypropylene.²²⁶ Most U.S. producers, importers, and purchasers reported that Styrofoam, plastic, and paperboard containers sometimes can be substituted for TMFPs in the firms' typical usage.²²⁷ Most firms reported that they had not received or made a request to replace TMFPs with other products.²²⁸ Half or less than half of responding U.S. producers reported that prices for paperboard, plastic, and Styrofoam products affected their sales of TMFPs.²²⁹ Majorities of importers reported that prices for these substitute products affected their sales of TMFPs.²³⁰ Large majorities of purchasers reported that prices for the substitute products did not affect their purchases of TMFPs.²³¹ The record indicates that the domestic industry's decrease in production from 2023 to 2024 was nearly entirely driven by ***.²³²

Effective September 24, 2018, subject imports from China became subject to an additional 10 percent *ad valorem* Section 301 duty, which was increased to 25 percent, effective May 10, 2019.²³³

Effective February 4, 2025, TMFPs originating in China were subject to an additional 10 percent *ad valorem* duty under International Emergency Economic Powers Act ("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 to 10 percent. Effective April 5, 2025, TMFPs originating in China were 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.²³⁴

²²⁵ CR/PR at 5.3. Of the indexing that did occur, it appeared more often in long-term and annual contracts.

²²⁶ CR/PR at 2.10.

²²⁷ CR/PR at Table 2.8.

²²⁸ CR/PR at Table 2.9.

²²⁹ CR/PR at Table 2.10.

²³⁰ CR/PR at Table 2.10.

²³¹ CR/PR at Table 2.10.

²³² CR/PR at 3.9 n.10.

²³³ CR/PR at I.13. Exclusions granted by the U.S. Trade Representative in 2022 for certain items imported under HTS numbers 4823.70.0020 and 4823.70.0040 ended on June 14, 2024. CR/PR at 1.13 n.12.

²³⁴ CR/PR at 1.13-14.

Effective April 5, 2025, TMFPs originating in Vietnam were subject to an additional 10 percent *ad valorem* duty as part of tariffs initiated in April 2025 under IEEPA. Effective April 9, 2025, Vietnam was instead assigned an individualized country duty of 46 percent *ad valorem*.²³⁵ However, effective April 10, 2025, the individualized country duties were suspended and the additional duty rate as part of tariffs initiated in April 2025 under IEEPA for TMFPs originating in Vietnam was returned to 10 percent. Effective August 7, 2025, Vietnam was assigned an individualized country duty of 20 percent.²³⁶

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”²³⁷

The volume of cumulated subject imports decreased from 254.0 million pounds in 2022 to 229.2 million pounds in 2023, then increased to 271.8 million pounds in 2024, for an overall increase of 7.0 percent from 2022 to 2024.²³⁸ Cumulated subject imports of 64.8 million pounds in interim 2025 were 0.9 percent lower than the 65.4 million pounds in interim 2024.²³⁹

Cumulated subject imports’ share of apparent U.S. consumption increased in each year of the POI from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall increase of *** percentage points.²⁴⁰ The ratio of cumulated subject imports to domestic production was *** percent in 2022, *** percent in 2023, *** percent in 2024, *** percent in interim 2024, and *** percent in interim 2025.²⁴¹

The petitions in these investigations were filed in October 2024. Petitioners contend that the filing of the petitions reduced subject import market penetration in interim 2025 relative to interim 2024, and request that the Commission accord reduced weight to post-petition data in these investigations pursuant to 19 U.S.C. § 1677(7)(I).²⁴² Cumulated subject imports’ market share was *** percentage points lower in interim 2025, after the filing of the

²³⁵ CR/PR at 1.14.

²³⁶ CR/PR at 1.14. The IEEPA tariffs are currently subject to ongoing litigation, making their applicability to subject imports in the imminent future uncertain. *See V.O.S. Selections Inc. v. Trump*, 149 F.4th 1312 (Fed. Cir. 2025) (*en banc*) (holding that IEEPA does not authorize these tariffs), *cert. granted*, (Sept. 9, 2025) (No. 25-250).

²³⁷ 19 U.S.C. § 1677(7)(C)(i).

²³⁸ CR/PR at Tables 4.2, 4.3.

²³⁹ CR/PR at Tables 4.2, 4.3.

²⁴⁰ CR/PR at Tables 4.11 & C.1. Cumulated subject imports’ share of apparent U.S. consumption was *** percent in interim 2025, *** percentage points lower than in interim 2025 at *** percent. *Id.*

²⁴¹ CR/PR at Table 4.2.

²⁴² *See* Petitioner’s Prehearing Br. at 20-21.

petitions, than in interim 2024, before the filing of the petitions.²⁴³ Moreover, the volume of U.S. shipments of cumulated subject imports, which had increased year-over-year between 2022 and 2024, was 16.4 percent lower in interim 2025 than in interim 2024.²⁴⁴ Although apparent U.S. consumption declined by *** percent over the interim periods, the volume of U.S. importers' shipments of cumulated subject imports declined by a greater percentage, while the average unit value of such shipments from China and Vietnam increased by 9.7 and 8.2 percent, respectively.²⁴⁵ These trends in part contributed to the domestic industry regaining *** percentage points of market share in the interim 2025 period.²⁴⁶

World Centric contends that Chinese New Year shutdowns affected shipments of subject imports, but concedes that the petition "probably was also a factor in the reduction of products coming in from China."²⁴⁷ As the Chinese New Year occurred in both interim 2024 and interim 2025, the timing of that holiday would not affect differences in import volumes when comparing interim 2024 with interim 2025. We further note that Petitioner provided testimony and evidence indicating that the filing of the petitions prompted renewed approaches by potential customers for domestically sourced TMFPs.²⁴⁸ Accordingly, we find that the decline in shipments of subject imports and subject imports' market share in interim 2025 relative to interim 2024 was related to the pendency of the investigations. Therefore, pursuant to 19 U.S.C. § 1677(7)(I), we exercise our discretion and place less weight on interim 2025 data.²⁴⁹

²⁴³ CR/PR at Tables 4.11 & C.1.

²⁴⁴ CR/PR at Table C.1. U.S. shipments of subject imports totaled 223.8 million pounds in 2022, 225.5 million pounds in 2023, and 259.1 million pounds in 2024, an increase of 15.8 percent. *Id.* U.S. shipments of subject imports totaled 61.4 million pounds in interim 2024, which was 16.4 percent lower than 51.4 million pounds in interim 2025. *Id.*

²⁴⁵ CR/PR at Table C.1.

²⁴⁶ CR/PR at Table C.1.

²⁴⁷ Hearing Tr. at 193-14 (Mr. Das).

²⁴⁸ See Petitioner's Posthear Br. at Exh. 1 p. 11 (reporting that Tellus acquired a new customer, ***, which purchased ***. Tellus also began selling ***).

²⁴⁹ Subject imports from China account for the vast majority of cumulated subject imports and, therefore, drive trends for the cumulated subject imports. See CR/PR at Tables 4.2, 4.11, C.1. Our finding that the effects of the petitions justify placing reduced weight on the decrease in volume of cumulated subject imports in interim 2025 rests on changes in the volume of subject imports from China; subject imports from Vietnam increased following the filing of the petitions. U.S. shipments of subject imports from China were 15.6 million pounds lower in interim 2025 than in interim 2024 while U.S. shipments of subject imports from Vietnam were 5.5 million pounds higher; as a result, U.S. shipments of cumulated subject imports were 10.1 million pounds lower in interim 2025 than in interim 2024. CR/PR at Tables 4.11, C.1. Our critical circumstances analysis in Section VII relates to subject imports from Vietnam alone.

Accordingly, we find that the volume of cumulated subject imports is significant absolutely and relative to U.S. consumption and production. We also find that the increase in the volume of cumulated subject imports from 2022 to 2024 is significant in absolute terms and relative to apparent U.S. consumption and production.

D. Price Effects of the Subject Imports

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

- (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
- (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.²⁵⁰

As discussed in section VI.B.3 above, we have found that there is a moderate-to-high degree of substitutability between the domestic like product and subject imports²⁵¹ and that price is an important factor, among other important factors, in purchasing decisions.

We have examined several sources of data for our underselling analysis. The Commission collected quarterly quantity and f.o.b. pricing data on sales of five products shipped to unrelated U.S. customers during the POI.²⁵² Seven U.S. producers and 30 importers provided usable pricing data of the requested products, although not all firms reported pricing for all products for all quarters.²⁵³ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. commercial shipments of TMFPs, *** percent of U.S.

²⁵⁰ 19 U.S.C. § 1677(7)(C)(ii).

²⁵¹ Commissioner Kearns finds that for products of the same general type, there is a high degree of substitutability.

²⁵² CR/PR at 5.4-5.20. The five pricing products were defined as follows:

Product 1.-- 8.75"-9.25" round thermoformed molded fiber plate, unlaminated and unprinted, 13.5 to 16.5 grams, of any color, without compartments, packaged in bulk cases (not packaged for retail sale).

Product 2.-- 9" x 9" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 43 to 47 grams, of any color, with or without compartments.

Product 3.-- 6" x 6" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 19 to 23 grams, of any color, with or without compartments.

Product 4.-- 8" to 8.75" x 5.6" to 6.5" rectangular thermoformed molded fiber tray, unlaminated and unprinted, 20 to 26 grams, of any color, with or without compartments.

Product 5.-- 8" to 8.75" x 10" to 10.75" thermoformed rectangular molded fiber tray with five compartments, unlaminated and unprinted, 20 to 26 grams, of any color.

²⁵³ CR/PR at 5.4.

commercial shipments of subject imports from China, and *** percent of U.S. commercial shipments of subject imports from Vietnam in 2024.²⁵⁴ These pricing data accounted for *** percent all subject imports.²⁵⁵

Subject imports undersold the domestic like product in 72 of 104 (69.2 percent) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of sales of subject imports reported in the pricing data. The margins of underselling ranged from *** percent and averaged *** percent.²⁵⁶ Subject imports oversold the domestic like product in the remaining 32 of 104 (30.8 percent) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports sales reported in the pricing data. The margins of overselling ranged from *** percent to *** percent and averaged *** percent.²⁵⁷

As discussed in more detail below, for pricing products 2, 3, and 5 (clamshells and trays), subject imports undersold the domestic product in the majority of comparisons and the majority or near majority of reported subject import volume was in quarterly comparisons with underselling. For pricing product 1 (plates), subject imports oversold the domestic product in the majority of comparisons and the majority of reported subject import volume was in quarterly comparisons with overselling. There were no available comparisons for product 4 (a tray product).

For pricing product 1, subject imports undersold the domestic like product in seven out of 26 (or 26.9 percent of) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports reported for pricing product 1, with margins of underselling ranging from *** percent and averaging *** percent.²⁵⁸ Subject imports oversold the domestic like product in the remaining 19 of 26 (73.1 percent) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of shipments reported for pricing product 1, with margins of overselling ranging from *** percent to *** percent and averaging *** percent for pricing product 1.²⁵⁹

For pricing product 2, subject imports undersold the domestic like product in 19 out of 26 (or 73.1 percent of) quarterly comparisons, corresponding to reported subject import sales

²⁵⁴ CR/PR at 5.4-5.5.

²⁵⁵ CR/PR at 5.5.

²⁵⁶ CR/PR at Tables 5.11, 5.12.

²⁵⁷ CR/PR at Tables 5.11, 5.12.

²⁵⁸ CR/PR at Table 5.11.

²⁵⁹ CR/PR at Table 5.11.

of *** units, representing *** percent of the total volume of shipments reported for pricing product 2, with margins of underselling ranging from *** percent to *** percent and averaging *** percent.²⁶⁰ Subject imports oversold the domestic like product in the remaining seven of 26 (26.9 percent) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports reported for pricing product 2, with margins of overselling ranging from *** percent to *** percent.²⁶¹

For pricing product 3, subject imports undersold the domestic like product in 23 out of 26 (or 88.4 percent of) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports reported for pricing product 3, with margins of underselling ranging from *** percent and averaging *** percent.²⁶² Subject imports oversold the domestic like product in the remaining three of 26 (11.6 percent) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports reported, with margins of overselling ranging from *** percent to *** percent and averaging *** percent for pricing product 3.²⁶³

There were no reported domestic pricing data for pricing product 4; therefore, no pricing comparisons are possible.

For pricing product 5, subject imports undersold the domestic like product in 23 of 26 (or 88.4 percent of) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports reported for pricing product 5, with margins of underselling ranging from *** percent to *** percent and averaging *** percent.²⁶⁴ Subject imports oversold the domestic like product in the remaining three of 26 (11.6 percent) quarterly comparisons, corresponding to reported subject import sales of *** units, representing *** percent of the total volume of subject imports reported for pricing product 5, with margins of overselling ranging from *** percent and averaging *** percent for pricing product 5.²⁶⁵

Petitioner argues that subject imports in pricing product 1 (a plate product) are overrepresented in the pricing data compared to the share of plates in subject imports' U.S. shipments. As subject imports almost entirely oversold the domestic like product for sales of pricing product 1, Petitioner argues that the overrepresentation of subject imports in pricing

²⁶⁰ CR/PR at Table 5.11.

²⁶¹ CR/PR at Table 5.11.

²⁶² CR/PR at Table 5.11.

²⁶³ CR/PR at Table 5.11.

²⁶⁴ CR/PR at Tables 5.11.

²⁶⁵ CR/PR at Tables 5.11. There were no reported sales for pricing product 4.

product 1 skews the overall underselling by volume data.²⁶⁶ Petitioner also contends that the pricing data are skewed toward pricing product 1 because *** switched its production to focus on plates due to competition with subject imports of clamshells, and do not accurately reflect the reality of the whole industry, particularly the more recent entrants' production.²⁶⁷ Petitioner argues that the pricing data show significant underselling, particularly when taking this overrepresentation into consideration.

Conversely, World Centric argues that underselling was not significant because the volume of subject imports in quarters with overselling was far greater than the volume of subject imports in quarters with underselling, and overwhelmingly so for pricing product 1, which the U.S. industry dominates and for which prices increased throughout the POI.²⁶⁸ World Centric argues that this overselling for pricing product 1, combined with mixed underselling and overselling for pricing products 2 and 3 and the *** quantity of sales reported by the domestic industry for pricing products 2, 3, and 5, demonstrate the lack of direct competition between the products. World Centric also contends that the Commission should accord minimal weight to pricing products 2, 3, and 5 given the *** quantities of domestic sales reported.²⁶⁹

We agree with petitioner that the overall volume of subject imports associated with quarters of overselling is driven by the volume of subject imports reported for pricing product 1.²⁷⁰ Pricing product 1 (a plate product) accounted for *** percent of the volume of subject imports reported for all of the pricing products, whereas pricing products 2-5 (clamshells and trays) accounted for *** percent of the volume of subject imports in all the pricing products.²⁷¹

²⁶⁶ Petitioner's Prehear. Br. at 26-27.

²⁶⁷ Petitioner's Posthear. Br. at Exh. 1 p. 4.

²⁶⁸ World Centric's Prehear. Br. at 15-16; World Centric's Posthear. Br. at 8.

²⁶⁹ World Centric's Posthear. Br. at 8. World Centric also contends that the data for pricing products 4 and 5 are skewed because domestic producers reported sales of pricing product 4 in the preliminary phase of these investigations but not in the final phase. World Centric's Prehear. Br. at 17-18. World Centric argues that the weight range for pricing product 5 excludes many domestic products from the comparisons, pointing to evidence that *** produced a five-unit tray that was not captured by pricing product 5 because it weighs more than 26 grams per unit. World Centric's Posthear. Br. at 9-10, Exhs. 5, 7A, 7B. However, the fact that the domestic industry reported sales for pricing product 4 in the preliminary phase but not in the final phase of these investigations does not indicate reporting errors or skewing in the data. The pricing product definition for product 4 was changed for the final phase to better ensure "apples-to-apples" comparisons, with a weight range parameter added, as well as specifying that the product be unlaminated and unprinted. *Compare* CR/PR at 5.4 with *Preliminary Determinations*, USITC Pub. 5568 at V-4. Additionally, the fact that there may be domestic sales of products not captured by the pricing products does not detract from the probative value of comparisons of prices for products within the pricing product definitions.

²⁷⁰ See CR/PR at Table 5.11.

²⁷¹ Derived from CR/PR at Table 5.8.

In contrast, plates accounted for just *** percent of importers' U.S. shipments of cumulated subject imports in 2024, whereas *** percent of importers' U.S. shipments of cumulated subject imports in 2024 were of TMFP products other than plates, with clamshells accounting for *** percent, and trays accounting for *** percent of importers' U.S. shipments of cumulated subject imports in 2024.²⁷² Thus, the volume of subject imports reported for pricing product 1 relative to the volume of subject imports reported for pricing products 2-5 is not representative of the relative volumes of importers' U.S. shipments of plates relative to other TMFP products. Accordingly, were we to focus on the aggregate volume of underselling compared to overselling in the pricing data – which as noted is driven by the volume of subject imports in pricing product 1—it would risk obscuring the underselling occurring with respect to TMFP products other than plates where, based on the data for importers' overall U.S. shipments, subject imports are concentrated.²⁷³ This is particularly a concern given the evidence discussed below that U.S. producers seek to sell higher-value TMFP products such as clamshells and trays but have been prevented from doing so by subject import underselling. Therefore, based on the record of these investigations, we place emphasis on the relative overselling and underselling in the individual pricing products rather than on the aggregate volume of underselling versus overselling across the pricing products.

Subject imports predominantly oversold the domestic like product for sales of pricing product 1, and plates account for the large majority, *** percent, of the domestic industry's U.S. shipments in 2024.²⁷⁴ With respect to the remaining pricing products, there was underselling in a majority of comparisons for pricing product 2 (a clamshell product), covering *** percent of the volume of subject import sales of pricing product 2, and majority underselling by both comparisons and volume for pricing products 3 (a clamshell product) and 5 (a tray product).²⁷⁵ Although clamshells and trays accounted for *** percent of the domestic industry's U.S. shipments of TMFPs in 2024, Petitioner argues that U.S. producers seek to sell

²⁷² CR/PR at Table 4.7. The remainder of U.S. importers' U.S. shipments of subject imports were of lids (*** percent), cup carriers and portion cups (*** percent) and other types of TMFPs (*** percent).

²⁷³ While the pricing data account for *** percent of commercial U.S. shipments of cumulated subject imports in 2024, the data on U.S. shipments by product type account for 100 percent of U.S. shipments of cumulated subject imports in 2024. CR/PR at 5.4–5.5; *see id.* at Tables 4.7, 4.11.

²⁷⁴ CR/PR at Tables 4.7, 5.11.

²⁷⁵ CR/PR at Table 5.15. World Centric contends underselling in the clamshell products results from subject imports being concentrated in bleached clamshells and because bleached clamshells are less expensive than natural-colored clamshells. World Centric's Posthears. Br. at 9. The record does not bear this out. Importers' U.S. shipments from China and Vietnam each have higher average unit values for bleached clamshells than unbleached clamshells. CR/PR at Tables E.2, E.3.

these higher-value products but have been prevented from doing so by subject import underselling.²⁷⁶ Indeed, *** reported that it ceased domestic clamshell production ***,²⁷⁷ and that it ***²⁷⁸ domestic clamshell production in *** due to increased demand.²⁷⁹ U.S. producer *** reported importing subject imports because ***.²⁸⁰ As discussed below, domestic producers of clamshells and trays reported declining capacity utilization rates and increasing amounts of unused capacity during the POI, supporting the conclusion that the domestic industry could have produced and sold more of these products but for competition with low-priced subject imports.

Additionally, we consider it significant that that the frequency of subject import underselling and the volume of subject imports which undersold the domestic product increased in each year during the POI, as did the ratios of quarterly comparisons and volumes of subject imports associated with underselling compared to overselling in each year.²⁸¹ We also note that a large majority of purchasers reported that the domestic like product was inferior to subject imports on price (*i.e.*, the domestic product is higher priced).²⁸²

We have also considered information concerning lost sales. In the final phase of these investigations four U.S. producers reported that they had lost sales to subject imports, three reported they had to reduce prices, and two reported they had to roll back announced price increases due to low-priced subject imports.²⁸³ Of the 28 responding purchasers, 21 reported purchasing subject imports instead of domestic like product, and 15 of those 21 purchasers reported that subject imports were lower priced than the domestic product.²⁸⁴ Seven

²⁷⁶ Petitioner's Posthear. Br. at Exh. 1 p. 4; Hearing Tr. at 38 (Mr. Mascarello) ("That is a more attractive area for us to be, to sell those higher-growth, higher-value products."). The pricing data confirm that plates sell at much lower prices than clamshells and trays. CR/PR at Tables 5.3–5.7.

²⁷⁷ *** U.S. Producer Questionnaire Response at II-16 (***) correspondence with ***, EDIS Doc. 864206 (Nov. 18, 2025) (***)

²⁷⁸ CR/PR at Table 3.15.

²⁷⁹ Correspondence with ***, EDIS Doc. 864206 (Nov. 18, 2025). We observe that this occurred after ***.

²⁸⁰ CR/PR at Table 3.15. Clamshells were the largest product type imported by *** in 2024. *** Importer Questionnaire at II-5c.

²⁸¹ CR/PR at Table 5.13. Moreover, the frequency of subject import underselling and the volume and share of subject imports which undersold the domestic product were higher in 2024 than in 2022 for every pricing product (other than pricing product 4 of which there were no sales by the domestic industry). See CR/PR at Tables 5.3–5.7.

²⁸² CR/PR at Table 2.18. With regards to price, 15 of 19 responding purchasers reported that the domestic like product was inferior to subject imports from China and 11 of 12 responding purchasers reported that the domestic like product was inferior to subject imports from Vietnam. *Id.*

²⁸³ U.S. Producer Questionnaire Responses at IV-32.

²⁸⁴ CR/PR at Table 5.15.

purchasers reported that the lower price of the imports was a primary reason for buying subject imports instead of the domestic product for a total confirmed lost sales quantity of *** pounds.²⁸⁵ The volume of confirmed lost sales are equivalent to *** percent of all purchasers' total reported purchases of subject imports,²⁸⁶ *** percent of total U.S. shipments of subject imports,²⁸⁷ *** percent of U.S. producer shipments,²⁸⁸ and *** percent of apparent U.S. consumption during the POI.²⁸⁹

Based on the above considerations, including the moderate-to-high degree of substitutability between domestically produced TMFP and subject imports, the importance of price in purchasing decisions, the underselling throughout the POI in particular for pricing products 2, 3, and 5, purchasers' reports that subject imports were lower priced than domestic product, and the volume of confirmed lost sales which is significant relative to domestic production and apparent U.S. consumption, we find that underselling by subject imports was significant and contributed to cumulated subject imports gaining market share at the expense of the domestic industry from 2022 to 2024. Cumulated subject imports gained *** percentage points of market share from 2022 to 2024, largely at the expense of the domestic industry which lost *** percentage points of market share over that period.

We have also considered whether subject imports significantly depressed domestic prices or prevented price increases which otherwise would have occurred to a significant degree. Domestic prices for products 1 and 5 fluctuated during the POI, for an overall increase of *** percent for product 1 from the beginning to the end of the POI and an overall decrease

²⁸⁵ CR/PR at Table 5.15.

²⁸⁶ *Calculated from* CR/PR at Tables 5.14, 5.15, C.1.

²⁸⁷ *Calculated from* CR/PR at Tables 4.11, 5.15, C.1.

²⁸⁸ *Calculated from* CR/PR at Tables 3.8, 5.15, C.1.

²⁸⁹ *Calculated from* CR/PR at Tables 4.11, 5.15, C.1. The Commission further notes that certain purchasers that confirmed purchasing subject imports rather than domestic like product based on price during the preliminary phase of these investigations did not respond to the Commission's questionnaires in the final phase of these investigations. The confirmed lost sales from those purchasers amounted to *** pounds of subject imports. See *Preliminary Determinations* at Table V-13. Petitioner suggests adding this volume of lost sales to the volume of confirmed lost sales in these final phase investigations. Petitioner's Posthear. Br. at 9. As the preliminary phase investigations covered a different POI, we do not consider simple addition of the volume of lost sales to be appropriate. World Centric also argues that the scope of these investigations was modified between the preliminary and final phases, and therefore we cannot assume that the lost sales responses from the preliminary phase remain applicable. World Centric's Final Comments at 10. However, those changes were relatively minor. We therefore take note that the lost sales information from the preliminary phase investigations provides some corroborating support for our finding, discussed below, that lost sales are evidence of significant underselling that led to a market share shift from the domestic industry to subject imports.

of *** percent for product 5.²⁹⁰ Domestic prices for products 2 and 3 declined irregularly over the POI for overall declines of *** percent and *** percent.²⁹¹ Subject import prices for each pricing product declined irregularly over the POI.²⁹² Two responding purchasers reported that U.S. producers had reduced their prices in order to compete with lower-priced subject imports, while eight purchasers reported that U.S. producers had not done so, and 18 purchasers reported that they did not know if U.S. producers had done so.^{293 294}

²⁹⁰ CR/PR at Tables 5.3, 5.7, 5.8 & Figure 5.6.

²⁹¹ CR/PR at Tables 5.4, 5.5, 5.8 & Figure 5.6. There were no reported domestic sales of pricing product 4.

²⁹² CR/PR at Tables 5.3–5.8 & Figure 5.6.

²⁹³ CR/PR at Table 5.18.

²⁹⁴ Commissioner Johanson does not find that subject imports depressed domestic prices to a significant degree. The domestic industry's prices for pricing product 1 (a plate product) and product 5 (a tray product), its largest categories of TMFPs, increased during most of the POI despite competing with substantial volumes of subject imports. Domestic prices for pricing product 1 increased by *** percent over the POI while domestic prices for product 5 increased by *** percent from Q1 2022 to Q3 2024 before declining in the last two quarters of the POI. CR/PR at Tables 5.3, 5.7. Given decreased sales of subject imports following the filing of the petitions and lower apparent U.S. consumption in interim 2025 than in interim 2024, subject imports do not appear to be responsible for these domestic price declines at the end of the POI.

Plates accounted for *** percent of the U.S. industry's U.S. shipments in 2024 and trays accounted for *** percent; combined, these two product types accounted for *** percent of the U.S. industry's U.S. shipments in 2024 and pricing products 1 and 5 together accounted for *** percent of the U.S. industry's total volume of sales of all pricing products during the POI. *Id.* at Tables 4.7, 5.8. The U.S. industry accounted for *** percent of total U.S. shipments of plates in 2024 and *** percent of total U.S. shipments of trays in 2024, while cumulated subject imports accounted for *** percent of total U.S. shipments of plates in 2024 and *** percent of total U.S. shipments of trays in 2024, indicating substantial overlap in competition for these product types from the domestic industry and cumulated subject imports. *Id.* at Table 4.7. Similarly, the domestic industry accounted for *** percent of total sales of pricing product 1 and *** percent of total sales of pricing product 5 during the POI, and cumulated subject imports accounted for *** percent of total sales of pricing product 1 and *** percent of total sales of pricing product 5 during the POI. *Derived from* CR/PR at Table 5.8. Thus, the domestic industry's prices for products representing the large majority of its sales increased for most of the POI despite competing with substantial volumes of subject imports.

While domestic prices for pricing products 2 and 3 (clamshell products) declined during most of the POI, these products accounted for a small share of the domestic industry's sales. Clamshells accounted for just *** percent of the U.S. industry's U.S. shipments by quantity and *** percent of the U.S. industry's U.S. shipments by value in 2024, and the volume of the U.S. industry's sales of pricing products 2 and 3 accounted for just *** percent of the U.S. industry's total volume of sales of all pricing products during the POI. CR/PR at Tables 4.7, 5.8, E.1. Additionally, the two purchasers who confirmed that U.S. producers had reduced their prices in order to compete with subject imports are relatively small purchasers who combined purchased just *** pounds of domestically produced TMFPs during the POI, *** percent of the total purchases of domestic product reported by responding purchasers. *Derived from* CR/PR at Table 5.14.

The domestic industry's COGS to net sales ratio increased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall increase of *** percentage points.²⁹⁵ The industry's net sales unit value increased by \$*** per pound (*** percent) from

On the whole, Commissioner Johanson finds that the record does not indicate that subject imports depressed U.S. prices to a significant degree given that the prices for the large majority of the domestic industry's sales increased for most of the POI notwithstanding substantial subject import competition.

²⁹⁵ CR/PR at Tables 6.1, C.1.

2022 to 2024 while the industry's per-unit total COGS increased by \$*** per pound (** percent).^{296 297 298 299}

²⁹⁶ CR/PR at Table 6.2.

²⁹⁷ Chair Karpel finds that subject imports depressed prices for the domestic like product to a significant degree. As reviewed above, for products 2, 3 and 5, domestic prices declined over the POI and there was a near or clear majority of subject import underselling over the POI for these products. *Derived from* CR/PR at Table 5.11. At the same time, there was an increase in per-unit COGS including per-unit raw material costs and an increase in apparent U.S. consumption (which may understate the degree to which demand increased over the POI in view of other record evidence reviewed in section VI.B.1). CR/PR at Table 6.4 and C.1. But rather than increasing prices to reflect rising costs or demand, domestic producer prices for pricing products 2, 3 and 5 – representative of the TMFP products where subject imports were concentrated as reviewed above – declined as the domestic industry lost sales and market share to subject imports. Together with the Commission's findings above regarding the degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, I find that these facts support the conclusion that cumulated subject imports depressed prices for the domestic like product to a significant degree particularly for pricing Products 2, 3 and 5, where subject import competition was most pronounced.

²⁹⁸ Commissioner Johanson does not find that subject import prevented price increases which otherwise would have occurred to a significant degree. While the domestic industry's COGS to net sales ratio increased substantially from 2022 to 2024, this is largely due to increasing per-unit other factory costs and per-unit COGS being elevated due to low capacity-utilization rates among the domestic producers, reflecting the impact of declining or low production and sales volumes. The domestic industry's net sales unit value increased by \$*** per pound from 2022 to 2024, more than the increase in the industry's variable costs (raw material and direct labor costs combined increased by \$*** per pound from 2022 to 2024). CR/PR at Table 6.2. Domestic producers described the importance of operating at high capacity-utilization rates in this capital-intensive industry in order to lower per-unit costs, including per-unit raw material and direct labor costs in addition to other factory costs. *Id.* at 6.19–6.21. The established producers' production volume and capacity utilization declined from 2022 to 2024, causing their per-unit other factory costs to increase as their fixed costs were spread over smaller production and sales volumes. *Id.* at Tables 3.7, 6.4. The newer producers' capacity and production increased from 2022 to 2024 causing their per-unit other factory costs to decline, but their costs remained substantially higher than the established producers' unit costs as the newer producers' capacity-utilization rate decreased and they were unable to increase production to a level that would lower per-unit COGS sufficiently to permit profitable sales. *Id.* at 6.20–6.21 & nn.26, 27, Tables 3.7, 6.4.

Moreover, Commissioner Johanson finds that the availability of substitute products at lower prices somewhat constrains TMFP producers' ability to raise prices, because purchasers can switch (and have switched) to alternative products when the price premium for TMFPs becomes too great. TMFPs are viewed in the market as a premium product compared to other food containers due to their sustainability and are priced accordingly. CR/PR at 2.1, 2.13. Most U.S. producers, importers, and purchasers reported that paperboard, plastic, and Styrofoam containers sometimes are able to be substituted for TMFPs. *Id.* at Table 2.8. While most purchasers reported that the prices of substitute products do not affect their purchases of TMFPs, most importers and around half of responding U.S. producers reported that the prices of these substitute products affect their sales of TMFPs. *Id.* at Table 2.10. Notably, ***, the *** U.S. producer, stated that its production declined during the POI in part because ***. *Id.* at 3.9 n.10. U.S. producer *** similarly reported that depending on legislative

In sum, based on the record in these final investigations, we find that subject imports significantly undersold the domestic like product. This significant underselling resulted in subject imports gaining significant sales from the domestic industry and contributed to a shift in market share from the domestic industry to cumulated subject imports between 2022 and 2024.³⁰⁰ We therefore find that cumulated subject imports had significant price effects.

E. Impact of the Subject Imports³⁰¹

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission “shall evaluate all relevant economic factors which have a bearing on

requirements, customers shift to other perceived sustainable alternatives such as paperboard where there are pricing concerns. *Id.* at 2.12. While TMFPs are valued for their sustainability, firms reported that paperboard has the perception of being just as environmentally acceptable as TMFPs and so price conscious customers may choose paperboard over TMFPs because of costs. *Id.* at 2.13. Market participants note that price-sensitive customers demand low-priced products. *Id.* Therefore, the availability of substitute products somewhat constrains the ability of TMFP producers to increase prices without losing sales.

In sum, Commissioner Johanson finds that the record indicates that the domestic industry’s increasing COGS to net sales ratio results from declining production volumes (in the case of the established producers) and an inability to produce and sell more TMFPs (in the case of the newer producers), rather than demonstrates that the industry should have been able to increase prices significantly more than it did, particularly given the constraints that the availability of substitute products places on producers’ ability to raise TMFP prices without losing sales. Therefore, he does not find that subject imports prevented price increases that otherwise would have occurred to a significant degree.

²⁹⁹ Commissioner Kearns finds that there is some evidence that could support a finding of significant price depression or suppression. For example, despite strong demand, prices for most of the pricing products declined, particularly toward the end of the POI. The industry also saw a substantial increase in its COGS to net sales ratio, as costs increased more quickly than net sales average unit value. While some of that increase may be due to fixed costs being spread over a declining base of production and sales, some appears to have resulted from an inability to increase prices commensurate with increasing variable costs. However, having found significant underselling that contributed to a market share shift from domestic product to subject imports, which is sufficient to reach a finding that subject imports had a significant price effect, he considers it unnecessary to reach these other issues.

³⁰⁰ As discussed below in section VI.E, we disagree with respondents that non-price factors, such as availability of TMFPs from the domestic industry, account for the extent of the market share shift observed over the POI.

³⁰¹ The statute instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at LTFV, Commerce found dumping margins for producers/exporters in China ranging from 49.08 to 477.97 percent and dumping margins for producers/exporters in Vietnam ranging from 4.58 to 260.56 percent. CR/PR at 1.7–1.10. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China and Vietnam are selling subject imports in the United States at LTFV. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis

the state of the industry.”³⁰² These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”³⁰³

Parties differed as to whether the analysis should focus on all domestic producers in the aggregate, or differentiate between established and newer producers.³⁰⁴ We consider that all three sets of data indicate declining performance over the POI. Despite an increase in production capacity and apparent U.S. consumption and other record evidence that demand growth was strong, the trade and financial indicators for the industry as a whole generally declined over the POI, before a slight increase in some indicators during interim 2025. The established producers’ production, shipments, and financial performance declined throughout the POI. Although the newer producers’ production and shipments increased as they ramped up production, their financial losses grew larger. As discussed above in Section VI.C, we give less weight to the post-petition data as we find post-petition effects.

of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

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

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

³⁰⁴ The Commission’s task is to assess whether the industry “as a whole” has been injured by subject imports. *Cleo Inc. v. United States*, 30 CIT 1380, 1400 (2006), *aff’d*, 501 F.3d 1291 (Fed. Cir. 2007). “Evaluating the domestic industry ‘as a whole,’ however, is not a license to ignore information that would give context and meaning to the data it is analyzing in assessing the domestic industry’s performance. Indeed, the statutory directive to analyze the industry ‘as a whole’ compels an evaluation of all material factors raised by the parties that would render a more accurate reading of the health of the industry.” *Altix Inc. v. United States*, 26 CIT 709, 730 (2002), *aff’d*, 370 F.3d 1008 (Fed. Cir. 2004).

The industry's practical production capacity increased overall by *** percent between 2022 and 2024,³⁰⁵ and was *** percent higher in interim 2025 than in interim 2024.³⁰⁶ Investment and expansion by the newer producers drove these increases, as their production capacity increased by *** pounds (*** percent) between 2022 and 2024.³⁰⁷ Despite these increases, the domestic industry's production decreased by *** percent between 2022 and 2024,³⁰⁸ even as U.S. demand increased, and then remained essentially flat between interim periods.³⁰⁹ Accordingly, the domestic industry's practical capacity utilization rate decreased by *** percentage points between 2022 and 2024.³¹⁰ Its capacity utilization in interim 2025, *** percent, was *** percentage points lower than in interim 2024 at *** percent.³¹¹

The domestic industry's U.S. shipment quantity decreased by *** percent between 2022 and 2024,³¹² but was lower by *** percent between interim periods.³¹³ Accordingly, the

³⁰⁵ CR/PR at Tables 3.5, C.1. The industry's practical production capacity increased from *** pounds in 2022 to *** in 2023 and *** pounds in 2024. *Id.* at Tables 3.5, C.1. The established producers' practical production capacity fluctuated over the POI, first decreasing from *** pounds in 2022 to *** in 2023, then increasing to *** pounds in 2024, for an overall increase of *** percent between 2022 and 2024. *Id.* at Tables 3.7, C.1. The newer U.S. producers' practical production capacity increased from *** pounds in 2022 to *** in 2023 and *** pounds in 2024, for an overall increase of *** percent between 2022 and 2024. *Id.* at Tables 3.7, C.1.

³⁰⁶ CR/PR at Tables 3.5, C.1. The domestic industry's practical production capacity was *** pounds during interim 2025 and *** pounds during interim 2024. *Id.* at Tables 3.5, C.1.

³⁰⁷ CR/PR at Tables 3.7, C.1.

³⁰⁸ CR/PR at Tables 3.5, C.1. The domestic industry's production fell from *** pounds in 2022 to *** in 2023 and ***. *Id.* at Tables 3.5, C.1. The established producers' production decreased by *** percent between 2022 and 2024, falling from *** pounds in 2022 to *** in 2023 and ***. *Id.* at Tables 3.7, C.1. The newer producers' production first decreased from *** pounds in 2022 to *** pounds in 2023, then increased to *** pounds in 2024. *Id.* at Tables 3.7, C.1.

³⁰⁹ CR/PR at Tables 3.5, C.1. The domestic industry's production was *** pounds in interim 2025, compared to *** pounds in interim 2024 (a *** percent increase). *Id.*

³¹⁰ CR/PR at Tables 3.7, C.1. The domestic industry's practical capacity utilization decreased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024. *Id.* The established producers' capacity utilization decreased from *** percent in 2022, to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points. *Id.* The newer producers' capacity utilization decreased from *** percent in 2022, to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points. *Id.*

³¹¹ CR/PR at Tables 3.4, C.1.

³¹² CR/PR at Tables 3.8, C.1. The domestic industry's U.S. shipments decreased from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024. *Id.* The established producers' U.S. shipments decreased by *** percent between 2022 and 2024, falling from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024. *Id.* The newer producers' U.S. shipments rose sharply by *** percent between 2022 and 2024, increasing from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024. *Id.*

³¹³ CR/PR at Tables 3.8, C.1. The domestic industry's U.S. shipments increased from *** pounds in interim 2024 to *** pounds in interim 2025. *Id.*

industry's share of apparent U.S. consumption decreased year-over-year during the POI for a total decrease of *** percentage points, from *** percent in 2022 to *** percent in 2023, and to *** percent in 2024.³¹⁴ The industry's share of apparent U.S. consumption increased by *** percentage points between interim periods.³¹⁵

The domestic industry's end-of-period inventories increased by *** percent between 2022 to 2024,³¹⁶ and increased again, by *** percentage points, between interim 2024 and interim 2025.³¹⁷ As a share of total U.S. shipments, the domestic industry's end-of-period inventories increased by *** percentage points between 2022 to 2024,³¹⁸ and was *** percent higher between interim 2024 and interim 2025.³¹⁹

The domestic industry's employment-related indicators, including the number of production-related workers ("PRWs"),³²⁰ total hours worked,³²¹ and wages paid³²² all increased

³¹⁴ CR/PR at Tables 4.11, C.1. The established producers' market share decreased by *** percentage points between 2022 and 2024, while the newer producers' market share increased by *** percentage points. *Id.*

³¹⁵ CR/PR at Tables 4.11, C.1.

³¹⁶ CR/PR at Tables 3.9, C.1. The domestic industry's end-of-period inventories increased from *** pounds in 2022 to *** pounds in 2023 and *** pounds in 2024. *Id.*

³¹⁷ CR/PR at Tables 3.9, C.1.

³¹⁸ CR/PR at Table 3.9. As a share of total U.S. shipments, the domestic industry's end-of-period inventories increased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024. *Id.*

³¹⁹ CR/PR at Table 3.9.

³²⁰ CR/PR at Table 3.19. The industry's PRWs increased by *** percent from 2022 to 2024, from *** in 2022 to *** in 2023 and 2024; the number of PRWs was *** percent higher in interim 2025, at ***, than in interim 2024, at ***. *Id.* The established producers' PRWs increased by *** percent from 2022 to 2024, increasing from *** in 2022, to *** in 2023, and then decreasing to *** in 2024; the number of PRWs was *** percent higher in interim 2025, at ***, than in interim 2024, at ***. *Id.* at Table 3.17. The newer U.S. producers' PRWs increased by *** percent from 2022 to 2024, from *** in 2022 to *** in 2023 and *** in 2024; the number of PRWs was essentially stable between interim periods at *** in interim 2024 and *** in interim 2025. *Id.* at Table 3.18.

³²¹ CR/PR at Table 3.19, C.1. The number of total hours worked for the industry as a whole increased by *** percent from 2022 to 2024, from *** hours in 2022 to *** hours in 2023 and *** hours in 2024; it was *** percent higher in interim 2025, at *** hours, than in interim 2024, at *** hours. *Id.* The number of total hours worked for the established producers' decreased by *** percent from 2022 to 2024, from *** in 2022 and 2023 to *** hours in 2024; it was *** percent higher in interim 2025, at *** hours, than in interim 2024, at *** hours. *Id.* at Tables 3.17, C.1. The number of total hours worked for the newer producers' increased by *** percent from 2022 to 2024, from *** hours in 2022 to *** hours in 2023 and *** hours in 2024; it was *** percent higher in interim 2025, at *** hours, than in interim 2024, at *** hours. *Id.* at Tables 3.18, C.1.

³²² CR/PR at Table 3.19, C.1. As a whole, the domestic industry's wages paid increased *** percent from 2022 to 2024, from \$*** in 2022 to \$*** in 2023 and *** in 2024; they were *** percentage points higher in interim 2025, at \$***, than in interim 2024, at \$***. *Id.* The established producers' wages paid decreased by *** percent from 2022 to 2024, first increasing from \$*** in 2022 to \$*** in 2023, then decreasing to *** in 2024; they were *** percentage points higher in interim

between 2022 to 2024 and between interim periods, which was largely driven by increased employment by the newer producers. However, the industry's productivity declined year-over-year between 2022 and 2024, for an overall decrease of *** percent.³²³ We note that the established producers' productivity declined in each year of the POI, whereas the newer producers' productivity fluctuated throughout the period.³²⁴

The industry's financial performance declined markedly throughout the POI. Although the overall industry's gross profits remained positive between 2022 and 2024, they declined by *** percent during that period and turned to losses in interim 2025.³²⁵ We note in particular that the newer producers reported growing gross losses in each year of the POI, while established producers' gross profits and gross margins declined markedly.³²⁶ Operating income for the industry as a whole remained positive between 2022 and 2023, but declined by *** percent, and became losses in 2024 and interim 2025.³²⁷ The ratios of the industry's operating income to net sales ratios declined by *** percentage points between 2022 and 2024, turning negative in 2024, and declined by *** percentage points between interim periods.³²⁸ Again,

2025, at \$***, than in interim 2024, at \$***. *Id.* at Tables 3.17, C.1. The newer producers' wages paid increased by *** percent from 2022 to 2024, from \$*** in 2022 to \$*** in 2023 and *** in 2024; they were *** percentage points higher in interim 2025, at \$***, than in interim 2024, at \$***. *Id.* at Tables 3.18, C.1.

³²³ CR/PR at Tables 3.19, C.1. The domestic industry's productivity decreased from *** pounds per hour in 2022 to *** pounds per hour in 2023 and *** pounds per hour in 2024, for an overall decrease by *** percent. *Id.*

³²⁴ The established producers' productivity decreased from *** pounds per hour in 2022 to *** pounds per hour in 2023 and *** pounds per hour in 2024, for an overall decrease of *** percent. CR/PR at Tables 3.17, C.1. The newer producers' productivity decreased from *** pounds per hour in 2022 to *** pounds per hour in 2023, then increased to *** pounds per hour in 2024, for an overall decrease of *** percent. *Id.* at Tables 3.18, C.1.

³²⁵ CR/PR at Tables 6.1, C.1. The domestic industry's gross profits were \$*** in 2022, \$*** in 2023, and \$*** in 2024, with gross profit of \$*** in interim 2024 and a gross loss of \$*** in interim 2025. *Id.*

³²⁶ The established producers' gross profits were \$*** in 2022, \$*** in 2023, and \$*** in 2024, for an overall decrease of *** percent between 2022 to 2024. CR/PR at Tables 6.4, C.1. Their gross profit to net sales ratio declined from *** percent in 2022 to *** percent in 2023 and *** percent in 2024. *Id.* at Table 6.4. The newer producers' gross losses amounted to \$*** in 2022, \$*** in 2023, and \$*** in 2024. *Id.* Their gross profit to net sales ratio declined from negative *** percent in 2022 to negative *** percent in 2023 before improving to negative *** percent in 2024. *Id.*

³²⁷ CR/PR at Tables 6.1, C.1. The domestic industry's operating income decreased from \$*** in 2022 to \$*** in 2023, then turned to a loss of \$*** in 2024. *Id.* It reported losses of \$*** in interim 2024 and \$*** in interim 2025. *Id.*

³²⁸ CR/PR at Tables 6.1, C.1. The domestic industry's overall operating-income-to-net-sales ratio was *** percent in 2022, *** percent in 2023, and *** percent in 2024, with ratios of *** percent in interim 2024 and *** percent in interim 2025. *Id.* The established producers' operating-income-to-net-sales ratio was *** percent in 2022, *** percent in 2023, and *** percent in 2024 for an overall decline

although the newer producers' results were significantly worse, with operating losses throughout the POI, the established producers also saw significant declines, despite an increase in apparent U.S. consumption from 2022 to 2024.³²⁹ Similarly, the overall industry's net income declined, turning from net income to net loss between 2022 and 2023 and declining drastically in 2024.³³⁰ The industry's ratio of net income to net sales also declined by *** percentage points between 2022 and 2024, turning negative in 2023 and declining further in 2024, and was *** percentage points lower in interim 2025 than in interim 2024.³³¹ These trends saw significantly worse results for newer entrants but with established producers also showing declines.

Notwithstanding the negative financial performance, the domestic industry's capital expenditures increased overall by *** percent between 2022 and 2024, largely driven by substantial capital investments by the newer producers.³³² However, the industry's capital

of *** percentage points between 2022 and 2024, with ratios of *** percent in interim 2024 and *** percent in interim 2025. *Id.* at Tables 6.4, C.1. The newer producers' operating-income-to-net-sales ratio was *** percent in 2022, *** percent in 2023, and *** percent in 2024 for an overall increase of *** percentage points between 2022 and 2024, with ratios of *** percent in interim 2024 and *** percent in interim 2025. *Id.*

³²⁹ The established producers' operating income decreased from \$*** in 2022 to \$*** in 2023 and \$*** in 2024 for an overall decrease of *** percent, with operating incomes of \$*** in interim 2024 and \$*** in interim 2025. CR/PR at Tables 6.4, C.1. The newer producers' operating losses increased from a loss of \$*** in 2022 to a loss of \$*** in 2023 and a loss of \$*** in 2024, with losses of \$*** in interim 2024 and \$*** in interim 2025. *Id.*

³³⁰ CR/PR at Tables 6.1, C.1. The domestic industry's net income was \$*** in 2022, then it registered losses of \$*** in 2023 and \$*** in 2024. Its net loss was \$*** in interim 2024 and \$*** in 2025. *Id.* The established producers' net income decreased from \$*** in 2022 to \$*** in 2023 and \$*** in 2024. The newer producers' net losses increased from \$*** in 2022 to \$*** in 2023 and \$*** in 2024. *Id.* at Tables 6.4, C.1.

³³¹ CR/PR at Tables 6.1, C.1. The domestic industry's overall ratio of net income to net sales was *** percent in 2022, *** percent in 2023, and *** percent in 2024, with ratios of *** percent in interim 2024 and *** percent in interim 2025. *Id.* The established producers' ratio of net income to net sales was *** percent in 2022, *** percent in 2023, and *** percent in 2024 for an overall decline of *** percentage points between 2022 and 2024, with ratios of *** percent in interim 2024 and *** percent in interim 2025. *Id.* at Tables 6.4, C.1. The newer producers' ratio of net income to net sales was *** percent in 2022, *** percent in 2023, and *** percent in 2024 for an overall increase of *** percentage points between 2022 and 2024, with ratios of *** percent in interim 2024 and *** percent in interim 2025. *Id.*

³³² CR/PR at Tables 6.5, C.1. The domestic industry's overall capital expenditures totaled \$*** in 2022, \$*** in 2023, and \$*** in 2024; its expenditures totaled \$*** in interim 2024 and \$*** in interim 2025. *Id.* The established producers' capital expenditures totaled \$*** in 2022, \$*** in 2023, and \$*** in 2024, for an overall decrease of *** percent. *Id.* The newer producers' capital expenditures totaled \$*** in 2022, \$*** in 2023, and \$*** in 2024 for a total increase of *** percent. *Id.*

expenditures were *** percent lower in interim 2025 than in interim 2024.³³³ The industry's total assets increased by *** percent from 2022 to 2024.³³⁴ Its research and development expenditures decreased by *** percent from 2022 to 2024; they were *** percent higher in interim 2025 than in interim 2024.³³⁵

As explained above in Section VI.D, underselling by subject imports resulted in subject imports gaining a significant volume of sales at the expense of the domestic industry and contributed to the domestic industry's loss of market share to subject imports. The volume of confirmed lost sales indicates that the domestic industry could have had *** pounds more sales during the POI, or *** percent greater U.S. shipments, but for subject import underselling.³³⁶ The domestic industry lost *** percentage points of market share from 2022 to 2024 to cumulated subject imports.³³⁷ As a result, the domestic industry's production, shipments, and financial performance were worse than they otherwise would have been. The established producers' production, U.S. shipments, revenues, and profits declined from 2022 to 2024 as they lost market share to low-priced subject imports.³³⁸ While the newer producers' production and U.S. shipments increased during the POI, they were unable to produce and sell substantially more TMFPs than they did due to competition with low-priced subject imports, and their capacity utilization and profits declined as a result. These declines occurred despite growing demand and newer entrants' capital expenditures and investments in productive capacity. We therefore find that cumulated subject imports had a significant impact on the domestic industry.

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We have considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from other factors to subject

³³³ CR/PR at Tables 6.5, C.1. The established producers' capital expenditures totaled \$*** in interim 2024 and \$*** in interim 2025. *Id.* The newer producers' capital expenditures totaled \$*** in interim 2024 and \$*** in interim 2024. *Id.*

³³⁴ CR/PR at Tables 6.9, C.1. The Commission did not collect data regarding the industry's total assets during the interim periods. *Id.*

³³⁵ CR/PR at Table 6.7, C.1. The domestic industry's R&D expenses totaled \$*** in 2022, \$*** in 2023, and \$*** in 2024, with expenses of \$*** in interim 2024 and \$*** in interim 2025. *Id.* The established producers' R&D expenses totaled \$*** in 2022 and \$*** in 2023, with no reported expenses the rest of the period. *Id.* The newer producers' R&D expenses totaled \$*** in 2022, \$*** in 2023, and \$*** in 2024, with expenses totaling \$*** in interim 2024 and \$*** in interim 2025. *Id.*

³³⁶ *Derived from* CR/PR at Tables 4.11, 5.15.

³³⁷ CR/PR at Tables 4.11, C.1.

³³⁸ CR/PR at Tables 3.7, 4.11, 6.4, C.1.

³³⁹ As noted above, Chair Karpel finds that subject imports depressed domestic producer prices to a significant degree. Accordingly, she also finds that subject imports' depressive effect on domestic producer prices contributed to their declining financial performance over the POI and thus to material injury to the domestic industry.

imports. Nonsubject imports were the smallest source of supply to the U.S. market and their share of apparent U.S. consumption in 2024 was essentially the same as in 2022.³⁴⁰ Another potential alternative factor, declining demand, was not present, as apparent U.S. consumption increased by *** percent between 2022 and 2024 and other record evidence indicates strong demand. Increasing demand also does not explain the extent of the increase in cumulated subject imports' market share because the domestic industry's U.S. shipment quantity declined by *** pounds (or by *** percent) from 2022 to 2024 and it reported increasing amounts of unused practical capacity. Therefore, neither nonsubject imports nor changes in demand explain the injury to the domestic industry that we have attributed to subject imports.

World Centric argues that purchasers select subject imports based on non-price factors such as quality, features/customization, and product offerings, and not because of low prices.³⁴¹ Although some purchasers cited non-price factors such as quality concerns, availability, or range of product offerings as their reason for buying subject imports, the record indicates that these did not prevent price-based competition between subject imports and the domestic product and do not explain the extent of the domestic industry's loss of sales and market share to cumulated subject imports.

In regard to quality, although most purchasers reported it as a top purchase factor, the great majority regarded the domestic like product to be comparable on quality with subject

³⁴⁰ CR/PR at Table 4.11. Nonsubject import's share of U.S. consumption was *** percent in 2022, *** percent in 2023, and *** percent in 2024. *Id.* Like the domestic industry, nonsubject imports also lost U.S. market share to subject imports between 2022 and 2024. *Id.*

³⁴¹ World Centric's Prehear. Br. at 7-9.

imports.³⁴² Variety of product offerings is another non-price factor noted by World Centric,³⁴³ and purchasers reported it is an important purchasing factor, albeit less important than price and quality.³⁴⁴ We note that most purchasers rated the U.S. product to be inferior to subject imports from China and Vietnam in terms of product range, and that a slight majority of purchasers also rated the U.S. product to be inferior to subject imports in terms of availability.³⁴⁵ While the domestic industry and cumulated subject imports differed with respect to the shares of shipments accounted for by the various product types, both supplied the four largest types of TMFPs (plates, trays, bowls, and clamshells) that collectively accounted for the

³⁴² CR/PR at Table 2.18. The majority of purchasers (16 of 21) rated the U.S. product as comparable to subject merchandise from China in terms of quality meeting industry standards; four rated the U.S. product to be inferior and one rated it as superior. *Id.* Similarly, ten of 12 purchasers rated the U.S. product as comparable to subject merchandise from Vietnam in terms of quality meeting industry standards; the remaining two rated the U.S. product as inferior. *Id.* Additionally, the results were nearly the same when comparing the U.S. product to subject imports in terms of quality exceeding industry standards. *Id.* Most purchasers also rated the U.S. product to be comparable to subject imports from China and Vietnam in terms of product consistency. *Id.* Purchasers report that subject imports more frequently are able to meet minimum quality specifications than domestic producers, although the large majority of purchasers with knowledge of the U.S. product (14 of 19) reported that the U.S. product is always or usually able to meet minimum quality specifications. *Id.* at Table 2.14.

Petitioners claim that in their experience, customers do not view domestic TMFPs as inferior to subject imports on any factor except price. They submitted an email from a customer from March 2025 in which the customer said Tellus's clamshells are "just as good as anything else we tested." Petitioner's Posthear. Br. at Exh. 1 p. 13. Petitioners also cite Tellus's return rate for 2024 of *** percent and Genera's return rate of *** percent, indicating that customers rarely have an issue with their products' quality. *Id.* at Exh. 1 p. 20.

³⁴³ World Centric contends that U.S. producers' U.S. shipments dominated the markets for round or oval plates, while subject import shipments dominated the markets for clamshells and bowls, resulting in essentially two different market segments. World Centric's Prehear. Br. at 9.

³⁴⁴ Seventeen of 27 purchasers rated product range as a very important purchasing factor, 7 rated it as somewhat important, and 3 rated it not important. CR/PR at Table 2.13.

At the Commission's hearing, a purchaser witness for Respondents argued that the domestic industry cannot supply oven-safe products. Hearing Tr. at 144 (Ms. Davidson). U.S. producer Tellus responds that it launched an oven-safe product line in 2020 which is still continues to produce, indicating that the domestic industry can and does supply oven-safe products. Petitioner's Posthear. Br. at Exh. 1 pp. 23-24, Exhs. 14-15.

³⁴⁵ In terms of product range, 13 of 19 purchasers rated the U.S. product to be inferior to Chinese imports and nine of 11 rated the U.S. product to be inferior to Vietnamese imports, with the remainder rating them as comparable. CR/PR at Table 2.18. In terms of availability, eleven of 20 purchasers rated the U.S. product inferior to Chinese imports and 6 of 11 rated the U.S. product inferior to Vietnamese imports, with the remainder rating them comparable. *Id.* Several purchasers also reported that availability of product types was a reason for buying subject imports instead of the domestic product. CR/PR at Table 5.15.

vast majority, *** percent, of total U.S. shipments of TMFPs in 2024.³⁴⁶ The domestic industry and subject imports both supplied substantial shares of total U.S. shipments of plates and trays in 2024, and while subject imports supplied more clamshells and bowls than the domestic industry did, the domestic industry supplied appreciable shares of total shipments of these products.³⁴⁷ Notably, each primary type of TMFP was produced by at least three U.S. producers in 2024.³⁴⁸ The domestic industry's substantial and increasing unused capacity indicates that the domestic industry could have supplied more trays, bowls, and clamshells than it did during the POI, particularly in 2024 when the industry lost substantial market share to subject imports. Every domestic producer except for *** reported a practical capacity utilization rate below *** percent in 2024, and for most producers the rate was significantly below that.³⁴⁹ Further, as discussed above in Section VI.D, the record contains evidence that competition from large volumes of low-priced subject imports has inhibited domestic production of products such as clamshells. The *** domestic producer, ***, explained that it stopped producing clamshells before the beginning of the POI due to low-priced imports, including imports from China, and *** during the POI due to ***.³⁵⁰ Thus, limited availability of particular types of TMFPs from the

³⁴⁶ CR/PR at Table 4.7. Plates accounted for *** percent of the domestic industry's U.S. shipments in 2024 and *** percent of U.S. shipments of cumulated subject imports in 2024. *Id.* Trays accounted for *** percent of the U.S. industry's U.S. shipments in 2024 and *** percent of U.S. shipments of cumulated subject imports in 2024. *Id.* Bowls accounted for *** percent of the U.S. industry's U.S. shipments in 2024 and *** percent of U.S. shipments of cumulated subject imports in 2024. *Id.* Clamshells accounted for *** percent of the U.S. industry's U.S. shipments in 2024 and *** percent of U.S. shipments of cumulated subject imports in 2024. *Id.*

³⁴⁷ CR/PR at Table 4.7. The domestic industry supplied *** percent of total U.S. shipments of plates in 2024 and cumulated subject imports supplied *** percent. *Id.* The domestic industry supplied *** percent of total U.S. shipments of trays in 2024 and cumulated subject imports supplied *** percent. *Id.* The domestic industry supplied *** percent of total U.S. shipments of bowls in 2024 and cumulated subject imports supplied *** percent. *Id.* The domestic industry supplied *** percent of total U.S. shipments of clamshells in 2024 and cumulated subject imports supplied *** percent. *Id.*

³⁴⁸ In 2024, plates, the most prevalent domestic product, were produced by ***. U.S. Producer Questionnaire Responses at II-10. Clamshells were produced by domestic producers *** in 2024, and ***. *Id.*; correspondence with ***, EDIS Doc. 864206 (Nov. 18, 2025). Bowls were produced by domestic producers ***, while trays were produced by *** in 2024. U.S. Producer Questionnaire Responses at II-10.

³⁴⁹ CR/PR at Table 3.7; U.S. Producer Questionnaire Responses at II-10. The aggregate practical capacity utilization rate for the domestic producers of trays was *** percent in 2024, down from *** percent in 2022. *Id.* The aggregate practical capacity utilization rate for the domestic producers of bowls was *** percent in 2024, down from *** percent in 2022. *Id.* The aggregate practical capacity utilization rate for the domestic producers of clamshells was *** percent in 2024, down from *** percent in 2022. *Id.*

³⁵⁰ CR/PR at Table 3.15; correspondence with ***, EDIS Doc. 864206 (Nov. 18, 2025). U.S. producer *** also reported that ***. CR/PR at Table 3.15. Additionally, U.S. producer Tellus began

domestic industry during the POI reflects the impact of low-priced subject imports. In sum, although there are some products that domestic producers do not sell and some purchasers have availability concerns, the record indicates that there is head-to-head competition across most of the range of TMFPs and low-priced subject imports prevented the domestic industry from selling larger volumes of TMFPs of various types during the POI.³⁵¹

World Centric raises a similar argument with respect to color options, particularly white products, and customization, which it argues are not widely available from domestic producers, and push purchasers to choose subject imports instead.³⁵² In particular, it contends that custom or innovative TMFPs require new molds, and that domestic producers charge customers up-front fees for molds and require customers to commit to large purchases, while subject foreign producers do not charge for molds, and allow smaller production runs.³⁵³ In response, Petitioner argues that the domestic industry does produce white/bleached products, and subject imports drive prices to levels that are too low to provide customized, small-batch products and recover the tooling costs.³⁵⁴

Although a few purchasers report that white/bleached TMFPs are unavailable from U.S. producers,³⁵⁵ the domestic industry reports that the large majority, *** percent, of its U.S.

selling domestically produced lids ***, while the domestic industry reported *** U.S. shipments of lids in 2024. CR/PR at Table 4.7; Petitioner's Posthear. Br. at Exh. 1 p. 10. Cumulated subject imports accounted for *** percent of total U.S. shipments of lids in 2024. CR/PR at Table 4.7.

³⁵¹ World Centric also argues that U.S. producers have imported subject merchandise to fill out their product lines as they ramped up production. World Centric's Prehear. Br. at 11. It contends that imports made by domestic producers were unrelated to price but rather due to meeting demand for products not produced domestically and to address the lack of U.S. production capacity. *Id.* at 12. However, as previously explained, several U.S. producers reporting importing subject merchandise because import pricing made domestic production unfeasible. CR/PR at Table 3.15. Others reported importing as they ramped up their domestic capacity, yet subject imports from the domestic industry declined over the POI. Total subject imports reported by U.S. producers declined from *** pounds in 2022 (**% percent of total subject import volume) to *** pounds in 2024 (**% percent of total subject import volume). *Derived from* CR/PR at Tables 3.10–3.14, 4.2. The U.S. market share accounted for by U.S. shipments of subject imports by domestic producers declined from *** percent in 2022 to *** percent in 2024. *Derived from* CR/PR at Table 4.11 & U.S. Importer Questionnaire Responses at II-5a, II-6a. Thus, subject imports by the domestic industry do not explain the increase in cumulated subject import volume or market share from 2022 to 2024.

³⁵² World Centric's Prehear. Br. at 7 and 11.

³⁵³ World Centric's Prehear. Br. at 7.

³⁵⁴ Petitioner's Posthear. Br. at Exh. 1 pp. 20-22. Petitioner also reported that Tellus began selling a customized clamshell product to a new customer following the filing of the petitions. *Id.* at Exh. 1 p. 11.

³⁵⁵ CR/PR at Table 5.15.

shipments in 2024 were of bleached, plain colored TMFPs.³⁵⁶ U.S. producers *** report selling bleached TMFPs in 2024.³⁵⁷ *** sold bleached plates, trays, and bowls, and *** sold bleached plates.³⁵⁸ Moreover, Petitioner stated that bleached pulp is purchased off-the-shelf and is readily available to domestic producers, allowing them to produce any bleached TMFP product.³⁵⁹ They note that petitioning firms Genera and Tellus currently purchase several types of bleached pulp and other bleached pulp suppliers have been qualified.³⁶⁰ The record thus indicates that the domestic industry does produce large quantities of bleached/white product and producers who did not make bleached TMFPs in 2024 have the ability to do so.

We acknowledge that a majority of purchasers rated the domestic like product to be inferior to subject imports in terms of customization and printing on TMFPs,³⁶¹ and that several purchasers reported that U.S. producers offer more limited options than subject foreign producers for printing, embossing, lip printing, white color option, lamination, and custom sizes and shapes.³⁶² However a majority of responding importers (18 of 39) and nearly half of purchasers (13 of 27) reported that they do not sell or purchase TMFPs that are customized.³⁶³ Moreover, a majority of U.S. producers (five of nine) reported that they sell customized TMFPs (e.g., unique stamps, prints, embossing, specialty sizes or shapes, or custom molds).³⁶⁴ Only 8 of 26 purchasers reported purchasing TMFPs with custom molds, and a majority of U.S. producers (six of eight) offer TMFPs with custom molds.³⁶⁵ A majority of purchasers rated the U.S. product to be inferior to Chinese and Vietnamese imports in terms of molding and tooling costs, as well as prototyping costs, suggesting that subject imports are able to offer customized products at lower prices than the domestic industry.³⁶⁶ Therefore, although varying types of customization are important to some customers and domestic producers and subject producers

³⁵⁶ CR/PR at Table 4.8.

³⁵⁷ U.S. Producer Questionnaire Responses at II-10.

³⁵⁸ U.S. Producer Questionnaire Responses at II-10.

³⁵⁹ Petitioner's Prehear. Br. at 18 n.76.

³⁶⁰ Petitioner's Posthear. Br. at Exh. 1 p. 22.

³⁶¹ CR/PR at Table 2.18.

³⁶² CR/PR at Tables 2.18, 5.15. A majority of purchasers rated customization as a somewhat or not important purchasing factor: 12 of 27 purchasers rated customization as very important, 6 rated it as somewhat important, and 9 rated it as not important. CR/PR at Table 2.13. Similarly, most purchasers reported that mold and tooling costs, prototyping costs, printing on TMFPs, and laminated products are somewhat or not important purchasing factors; these were the least-important purchasing factors in the data collected. *Id.*

³⁶³ CR/PR at 2.19.

³⁶⁴ CR/PR at 2.19.

³⁶⁵ CR/PR at 2.19.

³⁶⁶ CR/PR at Table 2.18.

offer different customization options to a degree, these factors do not appear to limit price-based competition for most of the range of TMFP products, nor do they detract from the significant volume of confirmed lost sales due to price reported by purchasers.

World Centric also argued that minimum order requirements differentiated domestic product from subject imports.³⁶⁷ Purchasers were evenly divided between whether minimum quantity requirements are very important or somewhat/not important.³⁶⁸ Eleven of 20 purchasers rated the U.S. product to be inferior to subject imports from China in terms of minimum quantity requirements, and six of 12 purchasers rated the U.S. product to be inferior to subject imports from Vietnam for this factor.³⁶⁹ Four of nine responding U.S. producers and 20 of 39 importers reported that they typically do not have minimum order quantities.³⁷⁰ Petitioners Genera and Tellus claim that they do not have minimum order quantities, that their machinery is specifically designed to accommodate small production runs, and that they have actually had production runs as small as ***.³⁷¹ Differences in minimum order quantities thus do not detract from the injurious impact of subject imports we have identified.

World Centric also contends that any poor financial indicators are largely the result of new producers' start-up expenses, which have boosted SG&A and depreciation costs, thereby depressing operating and net income.³⁷² It asserts that the domestic industry saw record growth and investment during the period.³⁷³ In particular, World Centric points to Genera's decision to start a \$350 million expansion in December 2023 even though it had idled part of its production earlier that year.³⁷⁴

The record does not support a conclusion that the industry's poor financial performance is wholly the result of newer producers' expanded production activities. The domestic industry's production declined by *** pounds from 2022 to 2024 even as apparent U.S. consumption grew by *** pounds.³⁷⁵ While start-up costs impacted newer producers' financial performance, the established producers' financial performance also deteriorated over the

³⁶⁷ World Centric's Posthear. Br., Exh. 1 at 1; World Centric's Prehearing Br. at 10.

³⁶⁸ CR/PR at Table 2.13. Fourteen of 27 purchasers rated minimum order quantity as a very important purchasing factor, eight rated it as somewhat important, and five rated it as not important. *Id.*

³⁶⁹ CR/PR at Table 2.18.

³⁷⁰ CR/PR at Table 2.16.

³⁷¹ Petitioner's. Posthear. Br. at Exh. 1 p. 21. We note that *** all use the same Motus production machines. *Id.* at Exh. 11. The Motus machines' smallest production run is reportedly ***. *Id.* at Exh. 1 p. 21.

³⁷² World Centric's Posthear. Br. at 11.

³⁷³ World Centric's Posthear. Br. at 12-13; World Centric's Prehear. Br. at 20-21.

³⁷⁴ World Centric's Posthear. Br. at 12-13.

³⁷⁵ CR/PR at Tables 3.7, 4.11, C.1.

POI.³⁷⁶ Further, as discussed above in Section VI.B.1, the record indicates that demand grew during the POI and is expected to continue to grow.³⁷⁷ Newer producers, for example Genera, have demonstrated that they identified growing demand in the market for the more complex higher value TMFP products and made substantial investments in production expecting to take advantage of that growing demand.³⁷⁸ As discussed above, the newer producers succeeded in offering bowls, clamshells, and trays that many purchasers rated as comparable to imports.³⁷⁹ Accordingly, these expanded capabilities should have enabled new producers to increase sales substantially, but they did not do so. Although newer producers saw a large percentage increase in sales, it was from a low base and their capacity utilization rate declined as their increased production substantially lagged growing capacity while subject imports gained market share via significant and increasing underselling of pricing products 2, 3, and 5 – the more complex TMFPs that the newer producers were targeting. Moreover, we have found that subject import underselling resulted in the domestic industry’s sales volumes being lower than they otherwise would have been, representing material injury by reason of subject imports.

Lastly, we reject World Centric’s argument that the declines in the domestic industry’s capacity utilization and production at the end of the POI were driven by *** and its ***.³⁸⁰ While *** reported a ***, it reported a practical capacity utilization rate of *** percent in 2024 with *** pounds in unused practical capacity in 2024, indicating that it could have produced and shipped substantially more TMFPs than it did.³⁸¹ The record also indicates that almost all U.S. producers, both established and newer producers, experienced decreasing capacity utilization over the POI.³⁸² *** cited both *** as causes of its decrease in production during the POI.³⁸³ *** also alleged that its lost sales and reduced prices in order to compete with subject imports.³⁸⁴ The record thus indicates that subject imports contributed to *** decline in production during the POI.

³⁷⁶ CR/PR at Table 6.4.

³⁷⁷ Petitioner’s Prehear. Br. at 15 n.63; Hearing Tr. at 185 (Mr. Das).

³⁷⁸ See CR/PR at Tables 6.5, 6.6; Petitioner’s Prehear. Br. at 17; Petitioner’s Posthear. Br. at Exh. 1 pp. 14-16.

³⁷⁹ U.S. Producer Questionnaire Responses at II-10; CR/PR at Table 2.18.

³⁸⁰ World Centric’s Prehear. Br. at 21-22.

³⁸¹ CR/PR at Tables 3.4, 3.7.

³⁸² See CR/PR at Table 3.7. Only *** capacity utilization meaningfully increased between 2022 and 2024. *Id.* *** capacity utilization increased between 2022 and 2023, but decreased again in 2024 for an overall increase of only *** percentage points. *Id.*

³⁸³ CR/PR at 3.9 n.10; correspondence with ***, EDIS Doc. 864206 (Nov. 18, 2025).

³⁸⁴ *** U.S. Producer Questionnaire at IV-32.

We therefore find that an industry in the United States is materially injured by reason of subject imports from China and Vietnam.

VII. Critical Circumstances

A. Legal Standards

The petitions in these investigations were filed on October 8, 2024. On September 30, 2025, Commerce issued its final determinations in the antidumping and countervailing duty investigations, finding that critical circumstances exist in the countervailing duty investigation with regard to imports from Vietnam of TMFPs from Vietnam Yuzhan Packaging Technology Co. Ltd. (Yuzhan), as well as HC Packaging Asia (Industrial Park), Honha Eco Pulp Viet Nam Paper Tray, Pulp Tray, Martin Vietnam Co. Ltd, and all other producers and/or exporters not individually examined.³⁸⁵

Because we have determined that the domestic industry is materially injured by reason of subject imports from Vietnam, we must further determine “whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued.”³⁸⁶

The Statement of Administrative Action (“SAA”) to the Uruguay Round Agreements Act, indicates that the Commission is to determine “whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order” and specifically “whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order.”³⁸⁷ The legislative history for the critical circumstances provision indicates that the provision was designed “to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}.”³⁸⁸ An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports,

³⁸⁵ *Thermoformed Molded Fiber Products from the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances*, 90 Fed. Reg. 46805 (Sept. 30, 2025); CR/PR at 4.10.

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

³⁸⁷ SAA at 877.

³⁸⁸ *ICC Industries, Inc. v United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff’d*, 632 F. Supp. 36 (Ct. Int’l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.³⁸⁹

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant,

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.³⁹⁰

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petitions with those subsequent to the filing of the petitions using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.³⁹¹

Petitioner's Arguments. Petitioner argues that imports from Vietnam increased significantly (by 124.3 percent) during the cumulative six-month period after the filing of the petitions as compared to the six-month period prior to the filing of the petitions.³⁹² It also contends that importers' inventories rapidly increased during the six months after filing of the petition (by *** percent), and that without additional duties, importers would be able to sell these inventories at detrimentally low prices in the U.S. market.³⁹³ Petitioner further asserts that Vietnamese imports significantly undersold domestic like product for *** in the fourth quarter of 2024 and the first quarter of 2025, and that Vietnamese TMFP prices decreased for pricing products *** over the POI. Thus, the timing, volume, and price of subject imports from Vietnam indicates that the remedial effect of the orders will be undermined without an affirmative critical circumstances determination.³⁹⁴

Respondent's Arguments. World Centric argues that any of the domestic industry's performance issues during the POI were not the result of subject imports. It contends that the

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

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

³⁹¹ See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-43, 731-TA-1095-97, USITC Pub. 3884 at 46-48 (Sep. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

³⁹² Petitioner's Posthear. Br., Exh 1 at 32.

³⁹³ Petitioner's Posthear. Br., Exh 1 at 32-33.

³⁹⁴ Petitioner's Posthear. Br., Exh 1 at 32-33.

record shows no massive import surge from Vietnam that would undermine the orders and that inventories of Vietnamese TMFPs are small in quantity and would not materially affect the domestic industry's recovery.³⁹⁵

B. Analysis

We typically begin the critical circumstances analysis by identifying the appropriate period for comparison of pre- and post-petition subject imports from the relevant country. The Commission frequently relies on comparisons of the six-month periods preceding and following filing of the petitions, but has relied on shorter periods when Commerce's preliminary determination applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.³⁹⁶ As noted, the petitions in these investigations were filed on October 8, 2025. Commerce issued its preliminary affirmative determination in its countervailing duty investigation of TMFPs from Vietnam on March 14, 2025.³⁹⁷ Therefore, we compare the volume of subject imports in the five months prior to the filing of the petitions

³⁹⁵ World Centric's Posthear. Br. at 14.

³⁹⁶ See *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sep. 2016); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

The Commission is not required to examine the same periods that Commerce examined in performing the critical circumstances analysis. See *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007); *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 at 34 (Apr. 1997).

³⁹⁷ *Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination*, 90 Fed. Reg. 46805, 46807 (Sept. 30, 2025).

If a petition is filed within the first half of a month, it is Commission practice to consider that month to be in the post-petition period. See, e.g., *Pentafluoroethane (R-125) from China*, Inv. Nos. 701-TA-662 and 731-TA-1554 (Final), USITC Pub. 5281 (Feb. 2022) at 1, 41-42.

(May 2024 – September 2024) with the volume of subject imports in the six months after the filing of the petitions (October 2024 – February 2025).³⁹⁸

The volume of imports from Vietnam subject to Commerce’s affirmative critical circumstances finding increased by 106.4 percent in the post-petition period, relative to the pre-petition period.³⁹⁹ That percentage increased in every month of the post-petition period.⁴⁰⁰

Moreover, the difference between total imports in the pre-petition period and the total in the post-petition period was 10.4 million pounds.⁴⁰¹ That volume is greater than total subject imports from Vietnam in 2022, more than half the total recorded in 2023 and roughly one half of the 2024 total.⁴⁰² The volumes of imports from Vietnam recorded in each of the post-petition months were larger than four out of the five months in the pre-petition period.⁴⁰³ The 10.4 million pound increase from the pre- to post-petition period is equivalent to *** percent of apparent U.S. consumption in 2024, and the post-petition volume of 20.2 million is equivalent to *** percent of apparent U.S. consumption in 2024. This increase occurred partially in interim 2025, when consumption declined by *** percent.⁴⁰⁴

Inventories of imports from Vietnam subject to Commerce’s critical circumstances determination increased by *** percent between the ends of the pre- and post-petition period.⁴⁰⁵ In absolute terms, the increase in inventories between the end of the pre- and post-

³⁹⁸ The Commission may also use different periods when the product is seasonal. *See 1,1,1,2--Tetrafluoroethane (R-134a) from China*, Inv. No. 731-TA-1313 (Final), USITC Pub. 4679 at 25 (April 2017) (seasonal product); *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007) (declining to analyze different periods absent seasonality). The record does not suggest that seasonal demand trends could have affected these comparisons. Majorities of importers and purchasers, and nearly half of domestic producers, indicated that the U.S. TMFP market was not subject to business cycles. Those that identified seasonal shifts differed as to their timing, with some experience low demand in summer, and others high demand in warmer months. CR/PR at 2.9.

³⁹⁹ CR/PR at Table 4.5.

⁴⁰⁰ CR/PR at Table 4.5. The percent increase in the volume of imports from Vietnam between the pre- and post-petition period was negative 7.1 percent after the first month, 30.5 percent after the second month, 66.1 percent after the third month, 95.4 percent after the fourth month, and 106.4 percent after the fifth month. *Id.*

⁴⁰¹ *Derived from* CR/PR at Table 4.5.

⁴⁰² *Derived from* CR/PR at Table 4.5 and Table C.1.

⁴⁰³ CR/PR at Table 4.5. Pre-petition, the volume of subject imports from Vietnam totaled 1.5 million pounds in May 2024, 2.0 million pounds in June 2024, 1.7 million pounds in July 2024, 1.5 million pounds in August 2024, and 3.0 million pounds in September 2024. Post-petition, subject imports from Vietnam totaled 2.8 million pounds in October 2024, 3.1 million pounds in November 2024, 4.5 million pounds in December 2024, 5.7 million pounds in January 2025, and 4.1 million pounds in February 2025. *Id.*

⁴⁰⁴ *Id.* at Table C.1.

⁴⁰⁵ CR/PR at Table 4.6.

petition periods amounted to *** pounds, equivalent to *** percent of apparent U.S. consumption in interim 2025.⁴⁰⁶

Furthermore, Vietnamese imports undersold the domestic like product in every pricing comparison during the fourth quarter of 2024 and first quarter of 2025, which overlap with the five-month post-petition period.⁴⁰⁷

In all, we find that the volume of imports from Vietnam subject to Commerce’s critical circumstances determination increased greatly during the post-petition period at prices that undersold the domestic like product in all comparisons,⁴⁰⁸ amassing inventories that were more than *** times their level prior to filing of the petition, and equivalent to a significant portion of apparent domestic consumption in interim 2025. On these bases, we find that imports from Vietnam subject to Commerce’s affirmative critical circumstances determinations are likely to undermine seriously the effect of the antidumping and countervailing duty orders on Vietnam. Accordingly, we determine that critical circumstances exist with respect to subject imports from Vietnam.

VIII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of TMFPs from China and Vietnam that are sold in the United States at less than fair value subsidized by the governments of China and Vietnam. We also find that critical circumstances do exist with respect to imports of TMFPs from Vietnam that are subject to Commerce’s final affirmative critical circumstances determinations.

⁴⁰⁶ *Id.* at Table 4.6. While we recognize that the interim 2025 period is three months while the post-petition period is five months, this is the closest comparable period based on available data.

⁴⁰⁷ *Id.* at Tables 5.3 – Table 5.7.

⁴⁰⁸ CR/PR at Tables 5.3-5.5 and 5.7.

Separate Views of Commissioner David S. Johanson

I join the Commission's Views on material injury. I write separately as I do not join the Commission's affirmative determination of critical circumstances regarding Vietnam and instead make a negative critical circumstances determination with regard to imports of TMFPs from Vietnam. I join, however, the majority's discussion of the legal standards, the parties' arguments regarding critical circumstances (Section VII.A), and the majority's reasoning regarding the use of a five-month period of comparison in the critical circumstances analysis.

As discussed below, I do not find that the increase in imports and inventories of TMFPs from Vietnam in the post-petition period would be likely to undermine seriously the remedial effect of the countervailing duty order because (1) the increase in volume of subject imports from Vietnam, and the increase in importers' inventories of those imports, were small in relation to U.S. consumption and to the domestic industry's production and sales; (2) growing U.S. demand is likely to insulate the domestic industry from the adverse impact of increased subject imports; and (3) as cumulated subject imports' market share declined and the domestic industry's market share increased in interim 2025 relative to interim 2024 due to the pendency of these investigations, this trend will likely continue with antidumping and countervailing duty orders in place, mitigating the impact of increased subject imports on the domestic industry.

Imports of TMFPs from Vietnam subject to Commerce's affirmative critical circumstances determination increased from *** pounds in the five months preceding the filing of the petitions to *** pounds in the five months following the filing of the petitions, an increase of *** percent.¹ The increase in subject import volume from Vietnam in the five-month post-petition period, *** pounds, is equivalent to *** percent of apparent U.S. consumption in 2024, *** percent of the domestic industry's production in 2024, and *** percent of the domestic industry's U.S. shipments in 2024.² The increase in imports from the pre-petition to post-petition periods represents a continuation of the upward trend in imports from Vietnam during the POI.³

U.S. importers' inventories of imports from Vietnam subject to Commerce's affirmative critical circumstances determination were *** pounds at the end of September 2024, before the filing of the petitions.⁴ They increased over the following five months, reaching *** pounds at the end of February 2025, an increase of *** percent from prior to the filing of the petitions.⁵

¹ CR/PR at Table 4.5.

² *Derived from* CR/PR at Tables 4.5, 4.11, C.1.

³ CR/PR at Table 4.3.

⁴ CR/PR at Table 4.6.

⁵ CR/PR at Table 4.6.

The increase of *** pounds in importers' inventories from September 2024 to February 2025 is equivalent to *** percent of apparent U.S. consumption in 2024, *** percent of the domestic industry's production in 2024, and *** percent of the domestic industry's U.S. shipments in 2024.⁶

While the sizes of the increases in subject imports from Vietnam and importers' inventories of imports from Vietnam, relative to apparent U.S. consumption and to the domestic industry's production and sales volumes, by themselves do not indicate that the remedial effect of the order is likely to be undermined seriously, other factors further support this conclusion. Petitioner argues that "demand for TMFPs was strong prior to and during the POI, with even stronger demand forecasted for the next three years."⁷ Petitioner characterizes demand for TMFPs as "soaring" and "surging."⁸ A third-party report submitted by Petitioner estimates a *** percent increase in demand for TMFPs across the *** segments from 2023 to 2028.⁹ A different consulting firm expects a compound annual growth rate of *** percent for molded fiber products in the food container segment, the largest end-use for TMFPs, from 2023 to 2028.¹⁰ Rapidly growing demand for TMFPs will benefit the domestic industry and insulate the domestic industry from the adverse impact of increased imports and inventories of imports from Vietnam by creating opportunities for more sales for the domestic industry.

Additionally, the market share trends observed following the filing of the petitions will likely continue with orders in place, making it less likely that the post-petition increase in imports will undermine seriously the remedial effect of the order. Cumulated subject imports' market share was *** percentage points lower in interim 2025 than in interim 2024 while the domestic industry's market share was *** percentage points higher, reflecting the impact of the pendency of the investigations.¹¹ With orders now in place, the domestic industry will likely continue to gain sales and market share as subject imports, facing large antidumping and countervailing duties, continue to reduce their presence in the market.¹² Increased sales and market share will benefit the domestic industry and mitigate the impact of increased imports and inventories of imports from Vietnam, making it less likely that the increase in imports from Vietnam in the post-petition period will undermine seriously the remedial effect of the order.¹³

⁶ Derived from CR/PR at Tables 4.6, 4.11, C.1.

⁷ Petitioner's Posthear. Br. at Exh. 1 p. 14.

⁸ Petitioner's Posthear. Br. at 5 n.24.

⁹ Petitioner's Posthear. Br. at Exh. 1 p. 14 & Exh. 9, Attach. B.

¹⁰ Petitioner's Posthear. Br. at Exh. 1 p. 15 & Exh. 9, Attach. C.

¹¹ CR/PR at Tables 4.11, C.1.

¹² CR/PR at Tables 1.2–1.5.

¹³ While subject imports from Vietnam undersold the domestic like product in every quarterly comparison in the fourth quarter of 2024 and the first quarter of 2025, this consideration does not

For the reasons stated above I conclude that imports from Vietnam that are subject to Commerce's affirmative critical circumstances determination are not likely to undermine seriously the remedial effect of the countervailing duty order to be issued on imports of TMFPs from Vietnam.

outweigh the factors discussed above. Moreover, with additional supplies of imports of TMFPs from Vietnam facing large antidumping and countervailing duties, importers will have little incentive to sell their remaining inventories of TMFPs from Vietnam at low prices.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by American Molded Fiber Coalition, which is comprised of Genera Inc. (“Genera”), Vonore, Tennessee; Tellus Products, LLC (“Tellus”), Belle Glade, Florida; and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO (“USW”), on October 8, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of thermoformed molded fiber products (“TMFPs”)¹ from China and Vietnam. Table 1.1 presents information relating to the background of these investigations.^{2 3}

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

Effective date	Action
October 8, 2024	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (89 FR 83051, October 15, 2024)
October 28, 2024	Commerce's notices of initiation (89 FR 87551 and 89 FR 87556, November 4, 2024, as corrected in 89 FR 91321, November 19, 2024)
November 22, 2024	Commission's preliminary determinations (89 FR 94762, November 29, 2024)
March 14, 2025	Commerce's CVD preliminary determinations and alignment of final determinations with final AD determinations (90 FR 12123 and 90 FR 12126, March 14, 2025, as corrected in 90 FR 14243 and 90 FR 14246, March 31, 2025)
May 12, 2025	Commerce's AD preliminary determinations (90 FR 20147 and 90 FR 20153, May 12, 2025, as corrected in 90 FR 24571 and 90 FR 24590, June 11, 2025); scheduling of final phase of Commission investigations (90 FR 23066, May 30, 2025, as revised in 90 FR 25642, June 17, 2025).
September 30, 2025	Commerce's final AD determinations (90 FR 46791 and 90 FR 46800, September 30, 2025)
September 30, 2025	Commerce's final CVD determinations (90 FR 46787 and 90 FR 46805, September 30, 2025)
September 30, 2025	Commission's hearing

¹ See the section entitled “The subject merchandise” in Part 1 of this report for a complete description of the merchandise subject in this proceeding.

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

³ Appendix B presents the witnesses who appeared at the Commission's hearing.

Effective date	Action
November 18, 2025	Revised scheduling of final phase of Commission investigations (90 FR 52697, November 21, 2025)
December 15, 2025	Commission's vote
January 5, 2026	Commission's views

Note: Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission revised its schedule for this proceeding. In addition, due to government closure per Executive Order 14371, the Commission's determinations were tolled.

Statutory criteria

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

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

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

In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant.. . .In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . .(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which

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

have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

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

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

Organization of report

Part 1 of this report presents information on the subject merchandise, subsidy rates/dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 presents the statutory requirements and information obtained for use in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

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

Market summary

TMFPs are produced from fibers that can come from various biomass resources such as wood, bamboo, and agriculture crops, or other agricultural and forest byproducts, residues, or wastes and are generally used as packaging, containers, and/or for food contact applications.⁶ The leading U.S. producers of TMFPs is***, while leading producers of TMFPs from subject countries include*** of China and*** of Vietnam. The leading U.S. importers of TMFPs from China are***, while the leading importers of TMFPs from Vietnam are***. Leading importers of product from nonsubject countries (primarily Mexico and Taiwan) include***. U.S. purchasers of TMFPs are mostly distributors and food service end users; leading purchasers include***.

Apparent U.S. consumption of TMFPs totaled approximately *** pounds (***) in 2024. Currently, nine firms are known to produce TMFPs in the United States, all of which provided a questionnaire response. U.S. producers' U.S. shipments of TMFPs totaled *** pounds (\$***) in 2024, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled 259.1 million pounds (\$510.7 million) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled 32.8 million pounds (\$44.5 million) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

⁶ Petition, p. 11, 21, October 8, 2024.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C.1. The Commission’s questionnaires collected data for the years 2022 to 2024 and interim periods January through March of 2024 (“interim 2024”) and January through March of 2025 (“interim 2025”). Except as noted, U.S. industry data are based on questionnaire responses of nine firms that accounted for virtually all of known U.S. production of TMFPs during 2025. U.S. imports are based on questionnaire responses.

Previous and related investigations

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

Nature and extent of subsidies and sales at LTFV

Subsidies

On September 30, 2025, Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of TMFPs from China and Vietnam.⁷ Tables 1.2 and 1.3 present Commerce's findings of subsidization of TMFPs in China and Vietnam.

Table 1.2 TMFPs: Commerce's final subsidy determination with respect to imports from China

Entity	Final countervailable subsidy rate (percent)
Guangxi Firstpak Environmental Technology Co., Ltd	7.56
Zhejiang Zhongxin Environmental Protection Technology Group Co., Ltd	97.82
Shaoneng Group Guangdong Luzhou Paper Mould Packing Products Co., Ltd	319.92
All others	62.66

Source: 90 FR 46787, September 30, 2025.

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

Table 1.3 TMFPs: Commerce's final subsidy determination with respect to imports from Vietnam

Entity	Final countervailable subsidy rate (percent)
Vietnam Yuzhan Packaging Technology Co. Ltd	5.06
HC Packaging Asia (Industrial Park)	200.70
Honha Eco Pulp Viet Nam Paper Tray	200.70
Pulp Tray, Martin Vietnam Co. Ltd	200.70
All others	5.06

Source: 90 FR 46805, September 30, 2025.

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

⁷ 90 FR 46787 and 90 FR 46805, September 30, 2025.

Sales at LTFV

On May 12, 2025, Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from China and Vietnam.⁸ Tables 1.4 and 1.5 present Commerce's dumping margins with respect to imports of product from China and Vietnam.

Table 1.4 TMFPs: Commerce's final weighted-average LTFV margins with respect to imports from China

Exporter	Producer	Final dumping margin (percent)
Guangxi Firstpak Environmental Technology Co., Ltd	Guangxi Firstpak Environmental Technology Co., Ltd	49.08
Zhejiang Zhongxin Environmental Protection Technology Group Co., Ltd./Chongzuo Zhongxin Environmental Protection Technology Co., Ltd./Guangxi Huabao Fiber Products Co., Ltd./Hangzhou Ganzhejun Environmental Protection Technology Co., Ltd./Jinhua Zhongsheng Fiber Products Co., Ltd.	Zhejiang Zhongxin Environmental Protection Technology Group Co., Ltd./Chongzuo Zhongxin Environmental Protection Technology Co., Ltd./Guangxi Huabao Fiber Products Co., Ltd./Hangzhou Ganzhejun Environmental Protection Technology Co., Ltd./Jinhua Zhongsheng Fiber Products Co., Ltd.	283.89
Xiamen Win Win Bag Co., Ltd	Shandong Yijia Packaging Technology Co., Ltd	214.73
Anhui Shangjia Environmental Tableware Co., Ltd	Anhui Shangjia Environmental Tableware Co., Ltd	214.73
Shandong Tranlin Straw New Environmental Technology Joint Stock Company Limited.	Shandong Tranlin Straw New Environmental	214.73
Shandong Teanhe Hongsheng International Trade Co., Ltd.	Shandong Tranlin Straw New Environmental	214.73
Zhejiang Kingsun Eco-Pack Co. Ltd	Zhejiang Kingsun Eco-Pack Co. Ltd	214.73
Zhejiang Kingsun Eco-Pack Co. Ltd	Guangxi Jiefeng Biological Technology Co., Ltd	214.73
Guangxi Jiefeng Biological Technology Co., Ltd	Guangxi Jiefeng Biological Technology Co., Ltd	214.73

⁸ 90 FR 46800 and 90 FR 46791, September 30, 2025.

Exporter	Producer	Final dumping margin (percent)
Guangxi Fineshine ECO Technology Co., Ltd	Guangxi Fineshine ECO Technology Co., Ltd	214.73
Wenzhou Sanxing Eco-Friendly Packaging Co., Ltd	Wenzhou Sanxing Eco-Friendly Packaging Co., Ltd	214.73
Guangdong Shaoneng Group Luzhou Technology Development Co., Ltd.	Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	214.73
Guangdong Shaoneng Group Luzhou Technology Development Co., Ltd.	Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	214.73
Guangdong Shaoneng Group Luzhou Technology Development Co., Ltd.	Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	214.73
Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	214.73
Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	Longyan Green Olive Co., Ltd	214.73
Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	Hebei Daoxiang Eco Technology Co., Ltd	214.73
Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	Guangxi Fineshine ECO Technology Co., Ltd	214.73
Shaoneng Group Luzhou Eco (Xinfeng) Technology Co., Ltd.	Zhejiang Fuchang Environmental Protection Technology Co., Ltd.	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Cangzhou Jinda Packaging Products Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Minjie Eco-Machinery Technology Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Shaoneng Group Luzhou Eco (XinFeng) Technology Co., Ltd.	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Hainan Huandu Biotechnology Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Hebei Daoxiang Eco Technology Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	HuiZhou Gold-Superman Packing Material Co., Ltd	214.73

Exporter	Producer	Final dumping margin (percent)
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Nanxiong Taihua Plastic Products Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	NAN Xiong Yangxin ECO Packing Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Shandong Qizheng Packaging Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Zhejiang Fuchang Environmental Protection Technology Co., Ltd.	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Jiangmen Zhuoyu Technology Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Dongguan Lvluo Environmental Protection Technology Co., Ltd.	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Nanxiong Aerospace Health Technology Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Purpus Packaging Technology (Dongguan) Co., Ltd	214.73
Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	Shantou Jinshida Supersonic Machine Co., Ltd	214.73
Clean Packaging Technology (Shenzhen) Co., Ltd	GreenDoer Advanced Materials, Co., Ltd	214.73
Ningbo HomeLink Eco-itech Co., Ltd	Zhejiang Jiadebao Technology Co., Ltd	214.73
Ningbo HomeLink Eco-itech Co., Ltd	Guangxi Ecolink Technology Co., Ltd	214.73
Guangxi Ecolink Technology Co., Ltd	Guangxi Ecolink Technology Co., Ltd	214.73
Shandong Shengquan New Materials Co., Ltd	Shandong Shengquan New Materials Co., Ltd	214.73
Jiangsu Jinsheng Environmental Protection Tableware Co., Ltd.	Jiangsu Jinsheng Environmental Protection Tableware Co., Ltd.	214.73
Hubei Wheat-Straw Environmental Technologies Co., Ltd.	Hubei Wheat-Straw Environmental Technologies Co., Ltd.	214.73
Shandong Lvhe Packaging Co., Ltd	Shandong Tranlin Straw New Environmental Technology Joint Stock Company Limited.	214.73
Yibin YUTO Eco Packaging Technology Co., Ltd	Yibin YUTO Eco Packaging Technology Co., Ltd	214.73
HaiKou YUTO Eco Technology Co., Ltd	HaiKou YUTO Eco Technology Co., Ltd	214.73
Xiamen Target Trade Co., Ltd	GeoTegrity Eco Pack (Xiamen) Co., Ltd	214.73

Exporter	Producer	Final dumping margin (percent)
Guangzhou Jiurong Packaging Co., Ltd	Guandong Fenghua Paper Co., Ltd	214.73
Guangzhou Jiurong Packaging Co., Ltd	Zhejiang Guangju Paper Products Co., Ltd	214.73
Guangzhou Jiurong Packaging Co., Ltd	Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	214.73
Guangzhou Jiurong Packaging Co., Ltd	Shaoneng Group Luzhou (Xinfeng) Technology Co., Ltd.	214.73
Guangdong Huilin Packaging Technology Group Co., Ltd.	Shenzhen Pinchuang Supply Chain Co., Ltd	214.73
Guangdong Huilin Packaging Technology Group Co., Ltd.	Pinchuang Fabric Products Factory	214.73
Fuzhou Hengli Paper Co., Ltd	Shaoneng Group Guangdong Luzhou Eco Technology Co., Ltd.	214.73
Fuzhou Hengli Paper Co., Ltd	Shenzhen Yike Environmental Resources Co., Ltd	214.73
Sabert Asia Holdings Limited	Sabert (Zhongshan) Limited	214.73
Fujian Lvwei Environmental Protection Tableware Co., Ltd.	Fujian Lvwei Environmental Protection Tableware Co., Ltd.	214.73
Wenzhou Keyi Environmental Protection Tableware Co., Ltd.	Wenzhou Keyi Environmental Protection Tableware Co., Ltd.	214.73
All others		477.97

Source: 90 FR 46800, September 30, 2025.

Table 1.5 TMFPs: Commerce's final weighted-average LTFV margins with respect to imports from Vietnam

Exporter	Producer	Final dumping margin (percent)
Vietnam Yuzhan Packaging Technology Company Limited	Vietnam Yuzhan Packaging Technology Company Limited.	4.58
Ningbo Changya Plastic (Vietnam) Co., Ltd	Ningbo Changya Plastic (Vietnam) Co., Ltd.	4.58
Ningbo Changya Plastic (Vietnam) Co., Ltd	Changya Newmaterial Technology Co., Ltd.	4.58
All others		260.56

Source: 90 FR 46791, September 30, 2025.

The subject merchandise

Commerce's scope

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

The merchandise subject to this investigation consists of thermoformed molded fiber products regardless of shape, form, function, fiber source, or finish. Thermoformed molded fiber products are formed with cellulose fibers, thermoformed using one or more heated molds, and dried/ cured in the mold.

Thermoformed molded fiber products include, but are not limited to, plates, bowls, clamshells, trays, lids, food or foodservice contact packaging, and consumer or other product packaging.

Thermoformed molded fiber products are relatively dense, with a typical fiber density above 0.5 grams per cubic centimeter, and are generally characterized by relatively smooth surfaces. They may be derived from any virgin or recycled cellulose fiber source (including, but not limited to, those sourced from wood, woody crops, agricultural crops/ byproducts/residue, and agricultural/ industrial/other waste). They may have any weight, shape, dimensionality, design, or size, and may be bleached, unbleached, dyed, colored, or printed. They may include ingredients, additives, or chemistries to enhance functionality including, but not limited to, anti-microbial, anti-fungal, antibacterial, heat/flame resistant, hydrophobic, oleophobic, absorbent, or adsorbent.

Thermoformed molded fiber products may also be subject to other processing or treatments, including, but not limited to, hot or after pressing, die-cutting, punching, trimming, padding, perforating, printing, labeling, dying, coloring, coating, laminating, embossing, debossing, repacking, or denesting. Thermoformed molded fiber products subject to this investigation may also have additional design features, including, but not limited to, tab closures, venting, channeling, or stiffening.

Thermoformed molded fiber products remain covered by the scope of this investigation if the subject product is encased by exterior packaging. They also remain covered by the scope of this investigation whether imported alone, or in any combination of subject and non-subject

⁹ 90 FR 46791 and 90 FR 46800, September 30, 2025; 90 FR 46787 and 90 FR 46805, September 30, 2025.

merchandise (e.g., a lid or cover of any type packaged with a molded fiber bowl, addition of any items to make the thermoformed molded fiber packaging suitable for end-use such as absorbent pads). When thermoformed molded fiber products are imported in combination with non-subject merchandise, only the thermoformed molded fiber products are subject merchandise.

Also excluded from the scope of this investigation are products covered by the scope of the antidumping and countervailing duty orders on paper plates from People's Republic of China, the Kingdom of Thailand, and the Socialist Republic of Vietnam.

Excluded from the scope of this investigation are thermoformed molded fiber products imported as packaging material that enclose and/or surround non-subject merchandise prepackaged for final sale upon importation into the United States (e.g., molded fiber packaging surrounding a cellular phone).

Thermoformed molded fiber products include thermoformed molded fiber products matching the above description that have been finished, packaged, or otherwise processed in a third country by performing finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the thermoformed molded fiber products. Examples of finishing, packaging, or other processing in a third country that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the thermoformed molded fiber products include, but are not limited to, hot or after pressing, die-cutting, punching, trimming, padding, perforating, printing, labeling, dying, coloring, coating, laminating, embossing, debossing, repacking, or denesting.

Tariff treatment

TMFPs are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 4823.70.0020 and 4823.70.0040.¹⁰ The general rate of duty is free for subheading 4823.70.00.¹¹ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Section 301 tariffs

Effective September 24, 2018, TMFPs originating in China were 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 TMFPs was increased to 25 percent ad valorem.¹²

Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)¹³

Effective February 4, 2025, TMFPs originating in China were subject to an additional 10 percent ad valorem duty under IEEPA, and on March 4, 2025, that additional duty increased to

¹⁰ These tariff classifications may include molded fiber products that are outside the scope of this investigation. TMFP may also be imported under HTS statistical reporting numbers 4823.61.0020, 4823.61.0040, 4823.69.0020, 4823.69.0040, and 4823.90.1000. USITC, HTS (2025) Revision 28, USITC Publication 5684, November 2025, p. 48.25.

¹¹ The general rate of duty is free for subheadings 4823.61.00, 4823.69.00, and 4823.90.10. HTS (2025) Revision 28, USITC Publication 5684, November 2025, p. 48.25.

¹² 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS heading 9903.88.03 and U.S. notes 20(e) to 20(f) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. HTS (2025) Revision 28, USITC Publication 5684, November 2025, pp. 99.3.71 to 99.3.72, 99.3.85, 99.3.425.

In 2022, exclusions granted by the U.S. Trade Representative (USTR) were listed in U.S. notes 20(ttt)(iii)(53) and (54) of chapter 99 for certain items imported under HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040. These exclusions ended on June 14, 2024. 87 FR 17380, Mar. 28, 2022, and 89 FR 46948, May 30, 2024.

In 2020, exclusions granted by the U.S. Trade Representative (USTR) were listed in U.S. note 20(iii)(78) of chapter 99 for certain items imported under HTS statistical reporting number 4823.61.0040. These exclusions ended on December 31, 2020. 85 FR 48600, Aug. 11, 2020.

¹³ Multiple tariffs have been enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”). Tariffs specific to Canada, China, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs under IEEPA have been amended over time.

20 percent ad valorem.¹⁴ However, effective November 10, 2025, that additional duty was reduced back to 10 percent.¹⁵

Effective April 5, 2025, TMFPs originating in China were 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.¹⁶

Effective April 5, 2025, TMFPs originating in Vietnam were subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA. Effective April 9, 2025, Vietnam was instead assigned an individualized country duty of 46 percent ad valorem. However, effective April 10, 2025, the individualized country duties were suspended and the additional duty rate as part of tariffs initiated in April 2025 under IEEPA for TMFPs originating in Vietnam was returned to 10 percent.¹⁷ Effective August 7, 2025, Vietnam was assigned an individualized country duty of 20 percent.¹⁸

¹⁴ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 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. HTS (2025) Revision 28, USITC Publication 5684, November 2025, pp. 99.3.4 to 99.3.5, 99.3.342 to 343.

¹⁵ 90 FR 50725, November 7, 2025. See also 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. HTS (2025) Revision 28, USITC Publication 5684, November 2025, pp. 99.3.4 to 99.3.5, 99.3.343.

¹⁶ The duty as part of tariffs initiated in April 2025 under IEEPA is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 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. HTS (2025) Revision 28, USITC Publication 5684, November 2025, pp. 99.3.5 to 99.3.12, 99.3.342, 99.3.350.

¹⁷ Individualized country duties as part of tariffs initiated in April 2025 under IEEPA for all countries other than China were suspended until August 1, 2025. 90 FR 15041, April 7, 2025. 90 FR 15625, April 15, 2025. 90 FR 30823, July 10, 2025. See also HTS headings 9903.01.25, 9903.01.72, and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. HTS (2025) Revision 28, USITC Publication 5684, November 2025, pp. 99.3.5 to 99.3.12, 99.3.342, 99.3.352.

¹⁸ 90 FR 37963, August 6, 2025. See also HTS headings 9903.01.25, 9903.01.72, 9903.02.69, and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. HTS (2025) Revision 28, USITC Publication 5684, November 2025, pp. 99.3.5 to 99.3.12, 99.3.342, 99.3.352, 99.3.374.

Table 1.7 TMFPs: Additional tariffs on imports from China and Vietnam as of December 1, 2025.

Duty rates in percent ad valorem

Additional tariff	China	Vietnam
Section 301	25	Not applicable
IEEPA – China specific	10	Not applicable
Tariffs initiated in April 2025 under IEEPA	10	20
Total additional ad valorem rate	45	20

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.

The product¹⁹

Description and applications

Molded fiber products (“MFP”) are products that are produced with natural cellulosic²⁰ or lignocellulosic²¹ fibers (figure I-1) and molded into a desired shape. These fibers come from various biomass resources such as wood, bamboo, agriculture crops (wheat straw, rice straw, hemp, sugarcane bagasse, corn stover, etc.), or other agricultural and forest byproducts, residues, or wastes. MFPs can be made with virgin fibers, recycled fibers, or a combination of both. Generally, virgin fibers are fibers that have been harvested for the first time and recycled fibers are fibers that have been recycled one or more times (e.g. recycled product scraps).²²

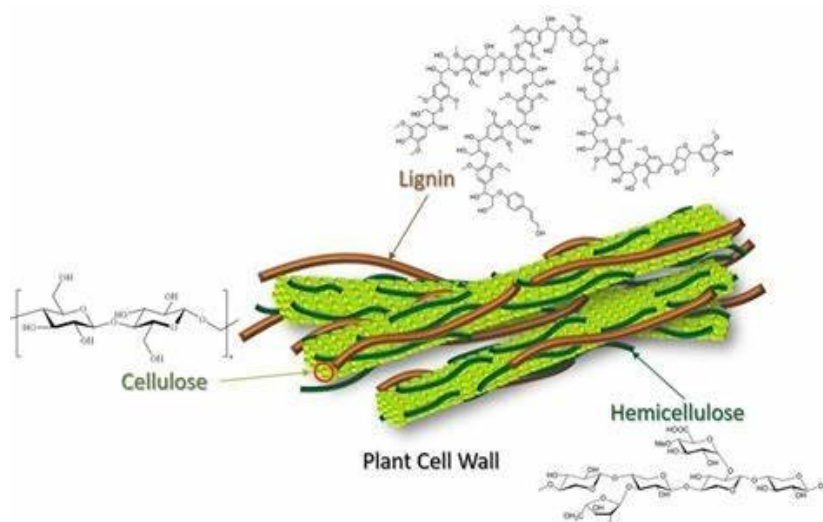
¹⁹ Unless otherwise noted, the information in this section is based on Petition, Vol. I, pp. 11-13, Response of Petitioner to Second Supplemental Questionnaire, pp. 1-4, Petitioners’ postconference brief, Exhibit 2. The universe of TMFPs is extensive, and the discussion provided is not exhaustive.

²⁰ “Cellulosic fiber is a type of fiber made from cellulose, a natural polymer that is found in plants and serves as a structural component of plant cell walls. These fibers are used in a variety of applications, including textiles, papermaking, and building materials. They are valued for their strength, durability, and sustainability. Cellulosic fibers can be obtained from the stem, leaf, or seed of a plant.” <https://textileengineering.net/cellulosic-fibers-types-properties-and-uses/>

²¹ Lignocellulosic fibers are fibers that contain both cellulose and lignin, a complex oxygen-containing organic polymer. Lignin adds compressive strength and stiffness, as well as waterproofs the cell wall. Britannica, “Lignin,” <https://www.britannica.com/science/lignin>, retrieved November 5, 2024.

²² Petition, Exhibit I-11.

Figure 1.1 TMFPs: Cellulose and lignin found in plant cells



Source: Jensen et. al, (2017). “Fundamentals of Hydrofaction™: Renewable crude oil from woody biomass.” <https://link.springer.com/article/10.1007/s13399-017-0248-8>, retrieved November 4, 2024.

TMFPs are a subset of MFPs, irrespective of fiber source, and are manufactured via a thermoforming process that results in unique structural properties that differentiate the subject product from non-thermoformed MFPs. MFPs vary in size, shape, thickness, fiber source, and color.²³ The thickness of TMFPs differs from non-thermoformed MFPs; TMFPs are categorized as “thin-walled,”²⁴ though domestic industry states that there is no specific measurement that uniformly defines the thickness of a thin-walled product as opposed to a thick-walled product.²⁵ TMFPs have a typical fiber density above 0.5 grams per cubic centimeter.²⁶

²³ The fibers used to make pulp produce a brown final product (figure 1.2), however the pulp may also be bleached to produce a white final product.

²⁴ The International Molded Fiber Association (“IMFA”) categorizes these products as Type 3, which are molded fiber manufactured using multiple heated molds and a product wall thickness of about 3/32 to 5/32 inches (2 to 4mm). IMFA, “Molded Fiber Masterclass,” <https://www.imfa.org/molded-fiber-masterclass/>, accessed November 5, 2024.

²⁵ Conference transcript, pp. 84 to 85 (Bhatti).

²⁶ The density refers to the final thermoformed molded fiber product. Conference transcript, p. 93 (Tiller).

Individual fiber types vary in density. Petition, Exhibit I-12.

TMFPs are typically manufactured for single-use packaging in food service and retail markets (figure 1.2).²⁷ Examples of TMFPs include plates, bowls, clamshells, and trays, among other containers and product packaging.²⁸ TMFPs may be manufactured with or without a lid; the lid may be attached (i.e. clamshell) or separate from the product.²⁹

Figure 1.2 TMFPs: Example of various TMFPs



Source: Petition, p. 11.

The tensile strength of the end product varies with fiber sources, although it is most common for manufacturers to produce TMFPs from a combination of fiber sources.³⁰ Generally, purchasers choose TMFPs as opposed to other substrate products (e.g., plastic, styrofoam, etc.) because TMFPs are more environmentally friendly and compostable. To be certified as fully compostable,³¹ the TMFP must be manufactured without per- and polyfluoroalkyl substances

²⁷ Food contact applications tend to be the primary use of TMFPs, though TMFPs can also be used for packaging and/or as containers for non-food related applications, such as for consumer products. Petitioners' postconference brief, p. 6.

²⁸ This not an exhaustive list of TMFPs. Examples listed above were described at the staff conference. Conference transcript, p. 15 (Mascarello).

²⁹ Lids are not always thermoformed. Please see footnote 52

³⁰ Conference transcript, p. 92 (Tiller).

³¹ The Biodegradable Products Institute ("BPI") is a commonly used third-party authority that verifies the composability of TMFPs. One requirement of BPI certification is having PFAs under 100 parts per million. Conference transcript, p. 73 (Serafini).

(PFAs), also known as “forever chemicals.”³² Domestic industry generally produces PFA-free products.³³

Otherwise, TMFPs do not have industry-wide standard specifications that must be met by the manufacturer. Customers, however, typically provide standards to TMFP producers for manufacture.³⁴ Both domestic and subject manufacturing plants, specifically those that manufacture direct-contact food products, have food safety certifications in place.³⁵ Beyond the certification requirements, customers may choose to conduct their own audits of plants to ensure food safety standards are met.

Manufacturing processes

The manufacturing process for TMFP can generally be divided into the following six stages: fiber processing, pulp preparation, molding, secondary processes, quality control, and packaging.

Fiber Processing

First, cellulose fibers must be extracted from a fibrous source (e.g. wood, bamboo, bagasse, etc.). There are multiple different methods to extract the cellulose fibers, depending

³² There are regional regulations restricting the use of PFAs but the regulations are not strongly enforced. Conference transcript, p. 62 (Mokaddem).

³³ Subject countries also market some of their products as PFA-free, but those marketing claims are not always true. Conference transcript, p. 19 (Mokaddem).

³⁴ There are various standards put forth by the American Society for Testing and Materials (“ASTM”) and Technical Association of the Pulp and Paper Industry (“TAPPI”) that are referenced in Exhibit I-12 of the petition. Generally, there are not specific requirements to produce a product. However, in order to sell into certain markets, customers may require a particular standard or certification. Conference transcript, p. 90 (Tiller).

³⁵ Safe Quality Food (“SQF”) and British Retail Consortium (“BRC”) are two most common food safety certifications. Conference transcript, p. 118 (Mascarello).

Food safety regulations in North America require fiber-based food containers, including non-TMFPs, to be manufactured with virgin fibers because recycled fiber has a higher risk of contaminants. Petition, Exhibit I-12.

Recycled fibers may be available that are certified for food contact. Conference transcript, p. 95 (Mokaddem).

on the fiber type, and they are generally classified into two methodologies: mechanical pulping and chemical pulping (see figures 1.3 and 1.4).³⁶

Chemical pulping processes are more common for wood-based fibers, whereas mechanical processes are more common in non-wood fibers.³⁷ There are also combinations of the two methodologies, chemi-mechanical and semi-chemical/mechanical, in which some chemicals are applied to soften the fibers but not as intensely as a pure chemical pulping process.³⁸ Previously manufactured pulp that has since dried may also go through a hydro pulping process to rehydrate and reuse the pulp prior to processing into the final product.³⁹

Most often, in both domestic industry and in the subject countries, multiple fiber types are blended into the pulp in some ratio to achieve strength targets and other performance attributes for TMFPs. Because a combination of multiple fibers is most often used, a combination of chemical and mechanical processing is also most common in both domestic industry and subject countries.⁴⁰ In both domestic industry and subject countries, TMFPs may be produced from pulp manufactured in an integrated facility, purchased pulp, or a combination of manufactured and purchased pulp.⁴¹

³⁶ Petition, Exhibit I-12.

³⁷ Wood requires more effort to liberate the cellulose and hemi-cellulose from the ligand bonds in that fiber, which requires a chemical process. Conference transcript, p. 88 (Tiller).

³⁸ Conference transcript, p. 88 (Tiller).

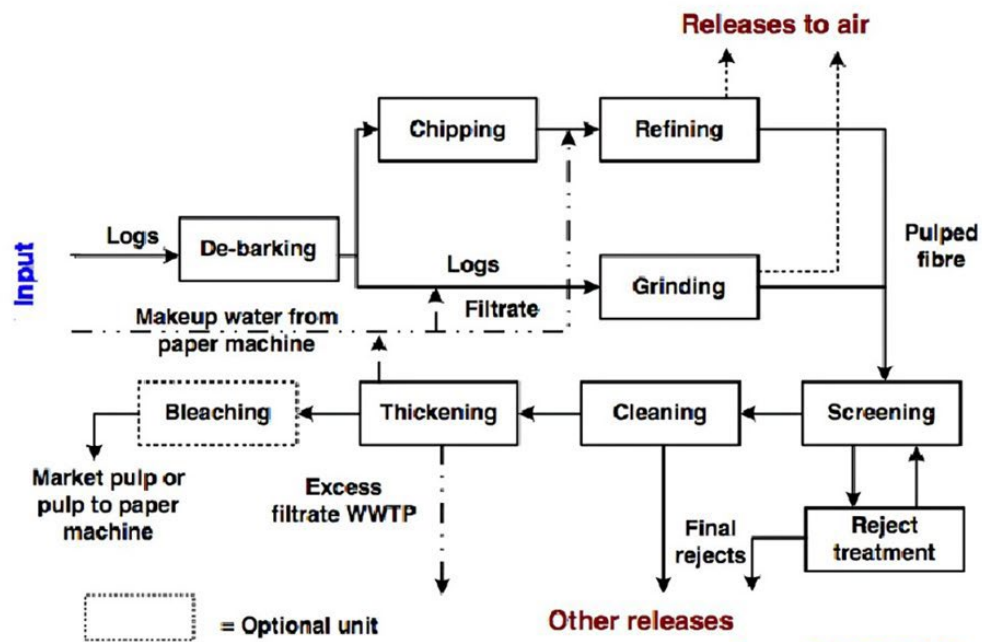
³⁹ Conference transcript, p. 89 (Tiller).

⁴⁰ Conference transcript, p. 92 (Tiller).

⁴¹ Petition, pp. 11 and 12.

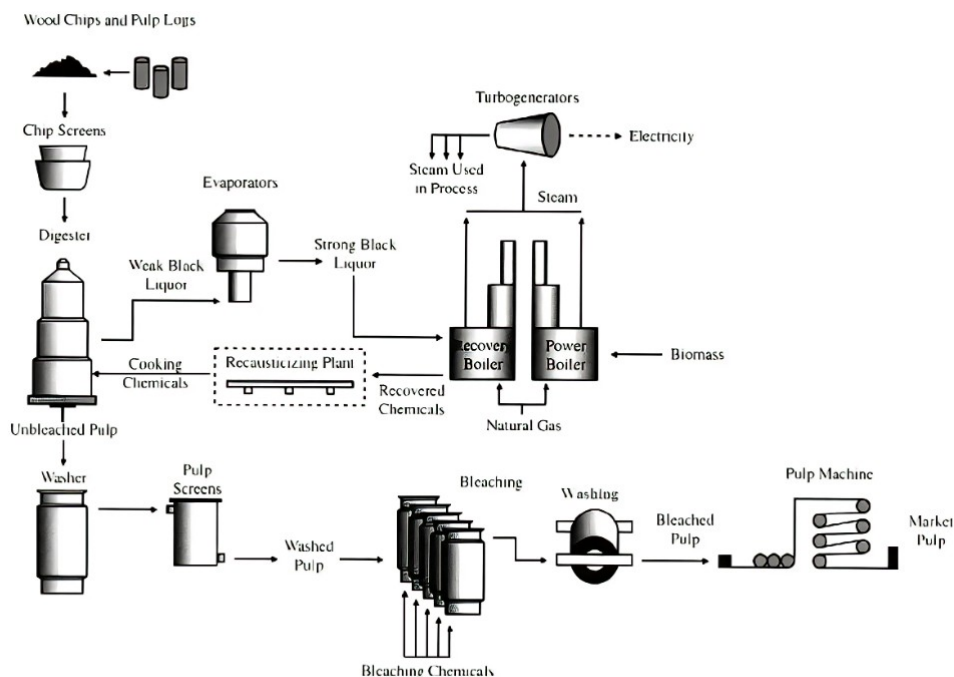
Figure 1.3 TMFPs: Flow chart of the mechanical pulping process

Main Steps Mechanical Pulping



Source: Petitioners' postconference brief, Exhibit 2-A.

Figure 1.4 TMFPs: Flow chart of the chemical pulping process



Source: Paper Pulp Machine, “Chemical pulping process”

<http://www.paperpulpermachine.com/process/chemical-pulping-process.html>, retrieved November 5, 2024.

Pulp preparation

Pulp preparation begins with mixing the raw materials until a desired consistency and format of pulp has been achieved. In addition to being referred to as pulp preparation (pulp prep), this step can also be known as stock preparation (stock prep), or the ‘approach system’.⁴² The pulp may be or may not be bleached prior to thermoforming.⁴³

There are two types of thermoforming, wet and dry, that are characterized by the pulp format and preparation. Wet thermoforming uses pulp slurry, which is pulp that is mixed and

⁴² Petition, p. 12.

⁴³ Both domestic and subject industries can make bleached or unbleached TMFPs. Petitioners do not have the capability to bleach the pulp that is produced in-house. In the domestic industry, bleached TMFPs are made from purchased market pulp. Hearing transcript pp. 104 to 106 (Tiller and Buenaventura).

diluted with water.⁴⁴ Dry thermoforming uses dry matter, which is pulp that has been fluffed and dried with air pressure. Additives, such as sizing agents, fillers, or various chemistries to improve the molding process or product performance may be introduced at this stage.⁴⁵ The pulp may also be bleached or not bleached.⁴⁶

Molding

Molding is the process of forming the pulp into the shape, size, and thickness of the desired product. Thermoforming uses different machinery than other molding processes, such as transfer molding (see figure 1.5). In transfer molding, once the pulp is pressed into a mold, the wet shaped products are taken out of the mold and put in a separate dryer. The drying time is also longer in transfer molding, which creates a final product with a different surface finish than TMFPs.⁴⁷

Each intended shape of TMFP has its own forming mold that is dipped into the pulp during the molding process. The purchaser typically provides shaped molds to the manufacturer based on their product needs.⁴⁸ The processing conditions for manufacturing different types of MFPs are mainly determined by the molding temperature, pressure, and process time.⁴⁹

⁴⁴ Pulp slurry contains more than 99 percent water and less than 1 percent fiber. Conference transcript, p. 10 (Tiller).

⁴⁵ Domestic industry reportedly does not have the capability to produce bakeable products. Conference transcript, p. 137 (Davidson).

⁴⁶ Chlorine bleach is banned in direct-contact food products (FDA). There are alternatives to using chlorine bleach to achieve the bleached pulp look, such as elemental chlorine-free (ECF) bleaching or oxygen delignification. Customers, however, typically prefer the “natural” look of non-bleached fibers. Conference transcript, p. 100 (Mokaddem).

⁴⁷ Conference transcript pp. 11 and 12, (Tiller).

⁴⁸ Conference transcript, pp. 138 and 150 (Davidson).

⁴⁹ Didone et. al, 2017. “Moulded Pulp Manufacturing: Overview and Prospects for the Process Technology” <https://onlinelibrary.wiley.com/doi/abs/10.1002/pts.2289>, retrieved October 23, 2024.

Some of those operating conditions are proprietary to the business, but they are all designed to achieve a finished product that meets a particular quality specification. Conference transcript, p. 105 (Tiller).

Wet Thermoforming

In the wet thermoforming process, the slurry is fed into a tub at the forefront of a thermoforming machine.⁵⁰ A forming mold, shaped as the desired final product (i.e., a plate, bowl, clamshell, etc.), is then dipped into the tub. Vacuum pressure is used to suck the pulp onto the mold, creating a fiber mat.⁵¹ The slurry is left to drain for a few seconds and then the wet fiber mat is placed into preheated male and female molds, also known as positive and negative molds, which are then pressed together using heat and pressure.⁵²

Dry Thermoforming

In the dry thermoforming process, the dry matter is compressed to form an airlaid fiber mat⁵³ and then placed into preheated male and female molds, where it is pressed together using heat and pressure. The machinery for dry thermoforming is slightly different than that used for wet thermoforming (see figure 1.5), but the final product has the same qualities as those created by wet thermoforming.⁵⁴

⁵⁰ Conference transcript, p. 10 (Tiller).

There is a type of molding, injection molding, by which heated liquid is injected into the mold via a tube. Domestic industry representatives stated that method is not used in the thermoforming process. Conference transcript, p. 98 (Tiller, Mokaddem).

Mr. Elfassy, an importer, stated that it is possible to use injection molding in the thermoforming process, but local producers do not use that method. Conference transcript, p. 181 (Elfassy).

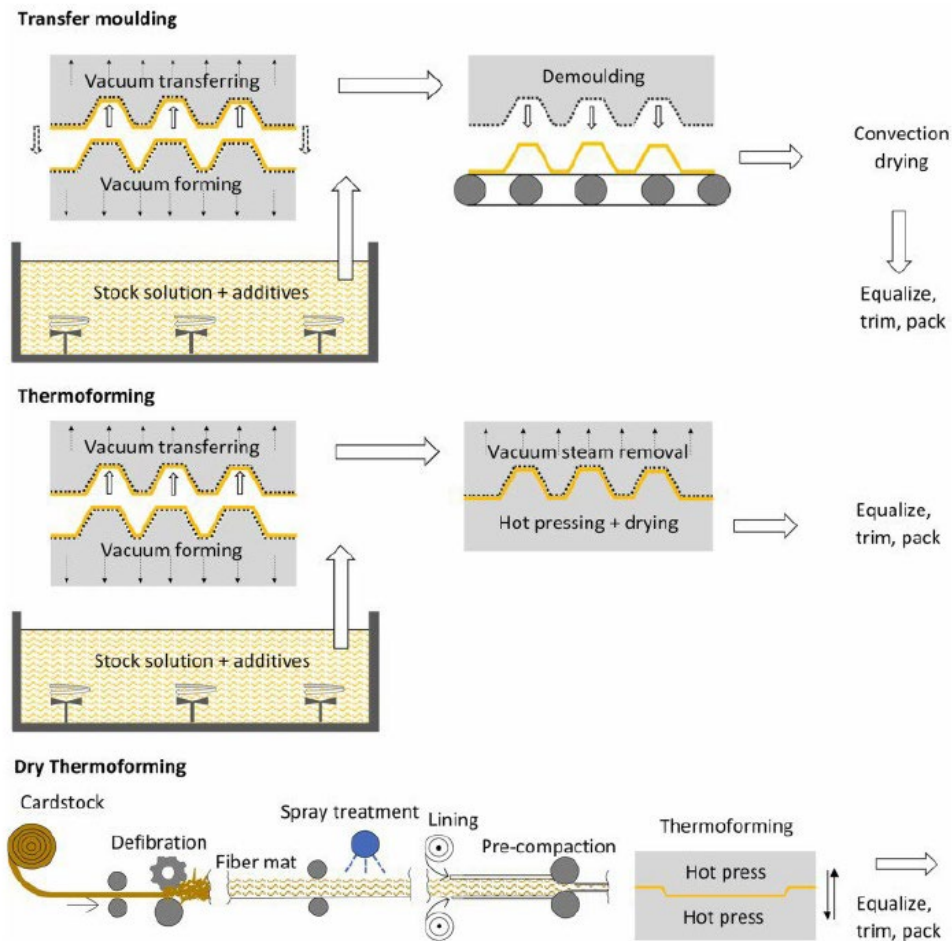
⁵¹ A fiber mat is created when fibers settle down vertically by gravity and are randomly distributed on the surface of a screen, held together by a binder. In wet thermoforming, the binder is the water in the pulp slurry. Tang et. al, 2017. "Multi-flexible fiber flows: A direct-forcing immersed boundary lattice-Boltzmann lattice-spring approach" <https://www.sciencedirect.com/science/article/abs/pii/S0301932216305572> retrieved November 4, 2024.

⁵² Conference transcript (Tiller) p. 11.

⁵³ Airlaid mats are a type of fiber mat created when dry fibers are distributed and condensed using air pressure as the binder. Campen Machinery, "Airlaid paper in packaging – a sustainable alternative", <https://campenmachinery.com/airlaid/airlaid-packaging>, retrieved November 4, 2024.

⁵⁴ Conference transcript (Tiller), p. 11.

Figure 1.5 TMFPs: Comparison of (wet) thermoforming, and dry thermoforming processes and equipment



Source: Petition, Exhibit I-12.

Heat and pressure are the key processes in both wet and dry thermoforming, quickly flash drying and curing the molded fiber product.⁵⁵ The resulting thermoformed product is described as permanently shaped, thin walled yet rigid, and with a smooth surface finish.⁵⁶

⁵⁵ The drying and curing process for thermoforming takes less than 20 seconds, in which the fibers undergo physical and chemical changes, and the water rapidly evaporates. Conference transcript, p. 10 (Tiller).

⁵⁶ Conference transcript, p. 10 (Tiller).

Secondary processes

Once the product has been thermoformed, it may go through one or more secondary processes to meet specific product needs (e.g. trimming, surface treatments, coating, laminating,⁵⁷ ⁵⁸ printing, labeling, punching, perforating, padding, embossing, etc.). Some customizations may also occur during the thermoforming process using mold inserts and other tooling.⁵⁹ Mold inserts create an imprint, such as a company's logo, on the final product during the thermoforming process without needing a separate mold. Customization can also include incorporating a separate piece to the final product that is not a TMFP, such as a plastic lid for a thermoformed bowl.⁶⁰

Quality Control

Before the final product is packaged and sold, it is inspected for quality, either manually or by automation, and scraps or rejected products are generally recycled back into the pulp mixture.⁶¹ Manual inspection includes a person inspecting the final product by hand including, but not limited to, weighing the product, cutting it open to look at the thickness, and other physical tests to determine density, strength, or other desired attributes. Automated inspection includes sensors, cameras, and other measuring instruments that are integrated into the machinery to perform tests or identify imperfections in the product.⁶²

Packaging

The final product is placed into a plastic bag, often in sleeves containing multiple TMFPs, and then placed into corrugated boxes. The sleeves are a protective measure so that the final

⁵⁷ Respondents claim that the domestic industry currently does not have laminating capability. Conference transcript, p. 150 (Davidson).

⁵⁸***. Staff trip notes, p. 3, September 9, 2025.

⁵⁹ The tooling may be produced by the manufacturer, purchased from a tooling maker, or provided by the customer. Postconference brief, p. 27.

⁶⁰ While the lid may not be a thermoformed molded fiber product, it is most often designed and manufactured concurrently with the TMFP to ensure the shape, size, and fit are compatible. Conference transcript, p. 51 (Mascarello).

"Fiber lids are required in dozens of markets like Hawaii's Oahu (Bill 40, Single Use Plastics ban) and Cupertino California (Single-Use-Plastics ban) due to legislation that requires the entirety of the single-use product to be compostable and made of natural fibers, these legislated markets will not accept clear PLA (Polylactic Acid) or petroleum plastic lidding made from PET, PP or HDPE which are the only lids that the petitioners offer" Respondent postconference brief, p. 11.

⁶¹ Petition, p. 13.

⁶² Conference transcript, p. 106 (Tiller).

product can be taken out of the box without damage. In the domestic industry, boxes are then loaded onto pallets and delivered to the customer.⁶³ Importers receive container shipments from subject countries and palletize them in domestic warehouses.⁶⁴

Domestic like product issues

In the preliminary phase of the investigations, the Commission defined a single domestic like product, coextensive with the scope.⁶⁵ Petitioners argued that the Commission should find that there was one domestic like product that was coextensive with the scope.⁶⁶ No respondent argued for a different definition of the domestic like product than the one proposed by petitioner.^{67 68}

In their comments on draft final phase questionnaires, Joint Respondents argued that the Commission should collect information to expand the domestic like product to include “non-thermoformed molded fiber products, i.e. transfer-molded fiber products”.⁶⁹ In their posthearing briefs, Petitioners continue to argue that the Commission should find one domestic like product that is coextensive with the scope.⁷⁰ Respondents argue that the domestic like product definition should be expanded to include transfer molded products.⁷¹

The Commission’s decision regarding the appropriate domestic product(s) that are “like” the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common

⁶³ Petitioners state that pallets are used to deliver the products in both domestic industry and subject countries. Conference transcript, p. 108 (Tiller).

Importer state subject countries do not put their goods on pallets to deliver to importers. Conference transcript, p. 144 (Elfassy).

⁶⁴ Ibid.

⁶⁵ Thermoformed Molded Fiber Products from China and Vietnam, Inv. Nos. 701-TA-739-740 and 731-TA-1716-1717 (Preliminary), USITC Publication 5568, December 2024 (“Preliminary publication”), pp. 12 to 13.

⁶⁶ Petitioners’ postconference brief, pp. 4 to 10.

⁶⁷ Preliminary publication, p. 9.

⁶⁸ Joint Respondents expressed a “concern” that there is no clear dividing line between TMFPs and non-thermoformed molded fiber products. Joint Respondents argued that there “may be separate domestic like products” among TMFPs depending on end use. They requested that the Commission collect data and analyze these issues in any final phase investigations. Joint Respondents’ Postconference Brief, November 1, 2025, pp. 6, 7.

⁶⁹ Joint Respondents’ comments on draft questionnaires, February 4, 2025, pp. 3 to 7.

⁷⁰ Petitioners’ posthearing brief, pp. 1 to 2.

⁷¹ Respondents’ posthearing brief, p. 2, November 20, 2025.

manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price. Information regarding these factors is discussed below.

Table 1.8 presents the count of firms' responses regarding the comparability of TMFPs to molded fiber products that are not thermoformed ("other MFPs") and appendix D presents firms' narratives.⁷² Appendix F presents data on TMFPs and other MFPs for responding firms.⁷³

Table 1.8 TMFPs: Count of firms' responses regarding the comparability of TMFPs to other MFPs, by domestic like product factor and firm type

Count in number of firms reporting

Factor	Firm type	Fully	Mostly	Somewhat	Never
Physical characteristics	U.S. producers	0	1	3	5
Interchangeability	U.S. producers	1	2	1	5
Channels	U.S. producers	2	2	1	3
Manufacturing	U.S. producers	0	1	4	4
Perceptions	U.S. producers	0	0	2	7
Price	U.S. producers	0	0	1	6
Physical characteristics	Importers	2	1	8	3
Interchangeability	Importers	1	1	6	5
Channels	Importers	4	5	1	4
Manufacturing	Importers	1	1	5	8
Perceptions	Importers	2	1	6	6
Price	Importers	1	1	4	6
Physical characteristics	Purchasers	2	1	2	1
Interchangeability	Purchasers	2	0	2	2
Channels	Purchasers	2	5	0	1
Manufacturing	Purchasers	2	0	1	1
Perceptions	Purchasers	2	0	2	3
Price	Purchasers	2	0	1	3

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

⁷²***. *** U.S. Producer Questionnaire, question VI-12.

⁷³ Other MFPs are molded fiber products that do not match the definitions of TMFPs. Non-thermoformed molded fiber products are typically formed in various molds, removed from the molds, and heated in an oven. The drying time is also longer in non-thermoforming processes, which creates a final product with a different surface finish than TMFPs (such as a thicker and rougher end product). While not dispositive, generally Types 1, 2, and 4 molded fiber products as defined by the International Molded Fiber Association (IMFA) are included in the other MFPs category and are not included in the definition of a TMFP.

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

U.S. market characteristics

TMFPs are items made of plant fibers that are molded into shapes via a process that uses heat and vacuum power to impart the product with strength, smoothness, and other desirable characteristics. TMFPs are largely used as foodservice containers but can also be used as packaging for other products.¹ TMFPs can be formed into many different shapes, but the most frequent are plates, bowls, clamshell containers, and trays. The type of TMFP produced is determined by the shape of the molds used to create the product. Some shapes, such as certain lids, are more difficult to manufacture.² The majority of TMFPs U.S. shipments are plain bleached, though many are left natural in color or colored. TMFPs can be customized via printing or embossing (e.g., with a purchaser's logo) either during the manufacturing process or after.³ TMFPs are viewed in the market as a premium product compared to other food containers due to their sustainability, (compostability, recyclability) and are priced accordingly.⁴

Apparent U.S. consumption of TMFPs increased in terms of quantity but decreased in terms of value during 2022 to 2024. Apparent consumption, in terms of both value and quantity, decreased in January to March ("interim") 2025 compared to interim 2024.

Two of 9 U.S. producers and 13 of 37 responding importers indicated that the market was subject to distinctive conditions of competition. Producer *** noted the market is price sensitive. Importers (***) stated that there are pricing pressures from other substrates such as plastic and foam, while *** stated that TMFP clamshell demand has increased due to increasing sustainability requirements in the United States. Importer *** reported a number of distinctive conditions to the TMFP market: cost, food safety, recyclability, ethical sourcing, environmental certifications (compostability, renewable materials, and sustainability).

¹ Petition, p. 18.

² Conference transcript, p. 130 (Tiller).

³ Conference transcript, p. 46 (Tiller).

⁴ Conference transcript, p. 58 (Mascarello).

U.S. purchasers

The Commission received 28 usable questionnaire responses from firms that had purchased TMFPs during January 2022 to March 2025.^{5 6 7} Twenty-one responding purchasers are distributors, 5 are food service end users, 4 are other end users. Two purchasers listed themselves as both distributors and food service end users. The largest purchases of TMFPs were reported by ***, each of which reported purchasing more than *** pounds of TMFPs between January 2022 and March 2025. Plates, bowls, and clamshell/hinged containers were the most frequently purchased products, although purchasers also noted dinnerware, drink carriers, lids, platters, and trays were among their most frequently purchased items.

Impact of section 301 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs on overall demand, supply, prices, or raw material costs (table 2.1). A majority of producers and importers, that reported knowing, noted there has been an effect. Two U.S. producers *** suggested that TMFPs were “recharacterized” as imports of bamboo in order to take advantage of a section 301 exclusion, although that exclusion ended in June 2024; and U.S. producer *** stated that there was no change in pricing behavior in the market afterward. *** indicated that the tariffs caused higher prices and reduced quality in the TMFP market. Importers most frequently noted that they passed along at least some of the increased costs to consumers. Importer *** reported that it was unable to remain consistently competitive in the U.S. market, and to gain business it had to lower its pricing to be more competitive resulting in lower margins and increased pressure to have cost reduction measures. Some importers also noted decreased demand for TMFPs from China, and switching to other container products or other sources to mitigate the impact of the tariffs.

⁵ The following firms provided purchaser questionnaire responses: ***.

⁶ Of the 28 responding purchasers, 17 purchased the domestic TMFPs, 24 purchased imports of the subject merchandise from China, 10 purchased imports of the subject merchandise from Vietnam, and 11 purchased imports of TMFPs from other sources.

⁷ 24 purchasers indicated they had marketing/pricing knowledge of domestic product, 23 of China product, 14 of Vietnam product, and 17 of nonsubject countries.

Table 2.1 TMFPs: Count of firms' responses regarding if there was an impact of 301 tariffs on China, by firm type

Count in number of firms reporting

Firm type	Yes	No	Don't know
U.S. producers	***	***	***
Importers	24	5	10
Purchasers	***	***	***

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

Channels of distribution

U.S. producers mainly sold product packaged for retail sale to end users. Importers from all sources mainly sold products not packaged for retail sale to distributors. Among all sources, the proportion sold to distributors was the largest as shown in table 2.2. For more tables breaking down shipments by product type (TMFPs and Other MFPs), import source and channel of distribution see Appendix F.

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

Shares in percent; interim is January through March

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors	***	***	***	***	***
United States	Retailers/ end users	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Retailers / end users	***	***	***	***	***
Vietnam	Distributors	***	***	***	***	***
Vietnam	Retailers / end users	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***
Subject sources	Retailers / end users	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***
Nonsubject sources	Retailers / end users	***	***	***	***	***
All import sources	Distributors	***	***	***	***	***
All import sources	Retailers / end users	***	***	***	***	***

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

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

Geographic distribution

U.S. producers and importers reported selling TMFPs to all regions of the United States (table 2.3). For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

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

Count in number of firms reporting

Region	U.S. producers	China	Vietnam	Subject sources
Northeast	8	29	9	33
Midwest	8	28	8	31
Southeast	7	30	10	33
Central Southwest	8	28	9	31
Mountains	8	26	9	29
Pacific Coast	8	30	10	33
Other	1	15	3	16
All regions (except Other)	7	24	8	28
Reporting firms	9	36	11	39

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

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

Supply and demand considerations

U.S. supply

Table 2.4 provides a summary of the supply factors regarding TMFPs from U.S. producers and from subject countries.

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

Quantity in 1,000 pounds; ratios and shares in percent; Count in number of firms reporting

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

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

Note: Responding U.S. producers accounted for more than 75 percent of U.S. production of TMFPs in 2025. Responding foreign producer/exporter firms accounted for less than 25 percent of U.S. imports of TMFPs from China, and more than 75 percent of U.S. imports of TMFPs from Vietnam during 2025. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 3 and 7.

Domestic production

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

U.S. producers increased capacity while decreasing production leading to a decrease in capacity utilization from 2022 to 2024. U.S. producers' inventories as a share of their total shipment nearly doubled over the period. U.S. producers reported exporting *** percent of their shipments to *** in 2024. No producer reported being able to produce other products on the same equipment as TMFPs. A number of producers reported that shortages of inputs and labor constraints impacted their ability to

maximize production, and that there was increased demand for TMFPs used in food take out containers because of the COVID-19 pandemic.

Subject imports from China

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

Chinese production and production capacity increased between 2022 and 2024, but capacity increased at a greater rate than production leading to a decrease in capacity utilization. Chinese producers' inventories decreased slightly from 2022 to 2024 but remained below 11 percent of their production throughout the period. Chinese producers reported that they shipped over *** of their shipments to the U.S. in 2024. All responding Chinese producers reported that they were unable to produce other products on the equipment used to produce TMFP's.

Subject imports from Vietnam

Based on available information, producers of TMFPs from Vietnam have the ability to respond to changes in demand with low to moderate changes in the quantity of shipments of TMFPs to the U.S. market. The main contributing factors to this degree of responsiveness of supply are available inventories, and ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include an inability to shift production to or from alternate products and essentially no unused capacity.

Vietnamese production and production capacity increased from 2022 to 2024 leading to capacity utilization remaining nearly constant throughout the period. Vietnamese inventories increased from 2022 to 2024. Vietnamese producers' shipments to non-U.S. markets were roughly one-fifth of their shipments throughout the period. All responding Vietnamese producers reported that they were unable to produce other products on the equipment used to produce TMFP's.

Imports from nonsubject sources

Nonsubject imports associated with HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040, "basket" categories," accounted for 40.0 percent of the value of total U.S.

imports in these classifications in 2024. The largest sources of nonsubject imports under these classifications were Canada, Mexico, Cambodia, and Taiwan.

Supply constraints

All U.S. producers, the majority of responding importers (27 of 40) and purchasers (16 of 27) reported that they had not experienced any supply constraints since January 1, 2022. The 13 importers reporting supply constraints noted that they occurred with respect to both U.S.-produced and imported product. Importers reported that they were impacted by market-wide conditions such as increased shipping costs and shipping delays, port congestion, an unanticipated spike in demand that producers were unprepared to supply, overordering by suppliers, delayed deliveries and declined orders from domestic producers, and customers being put on allocation. Importers further noted that port constraints such as strikes and shutdowns constrained supply from overseas. Several importers also listed tariffs as causing instability as it has become difficult to solidify overall import cost, with importer *** stating that domestic capability was not mature enough to cover that gap. Importer *** indicated that U.S. producers did not produce TMFPs with hinged lids and were unable to supply that portion of the market.

U.S. producer *** reported that, in general, it imported TMFPs to bolster capacity during moments when domestic production was temporarily decreased such as when it conducted ***. It reported that imports for TMFP clamshells were “required due to price competitiveness relative to capacity available”. TMFP lids were manufactured in China as there are not yet assets in the US to manufacture them.

Purchasers which reported supply constraints noted that after the COVID-19 pandemic, early in the POI, many imported and domestic products were put on allocation or new orders were refused. Purchaser *** noted that during this period of supply chain disruption, it needed to source both imported and domestic TMFPs. Regarding supply constraints in 2025, purchaser *** reported that ***. Also, purchaser *** reported that since ***.

Purchasers were asked if there are certain grades, types, sizes, or customizations of TMFPs only available from certain country sources and a slight majority of purchasers (14 of 25) stated that there were no product availability issues. Of the purchasers that reported a lack of

availability, purchaser *** reported that there is limited availability (both domestically and internationally) of oil-resistant TMFP food containers. Purchaser *** reported that China, Indonesia, Malaysia, and India provide a wide array of shapes, sizes and colors which are not available in the United States. In particular, it reported that white products are not domestically manufactured, leaving only the import countries as options for that product. Purchaser *** reported that it is unaware of any U.S. producer that can make product with sugarcane to scale, additionally, some U.S. producers will not currently agree to do private label products, even if within their production capabilities. Several purchasers *** reported that the availability and selection of customization options (printing, embossing, lip printing, lack of a white color option, lamination, and custom sizes and shapes) from U.S. suppliers is limited when compared to imported sources.

Table 2.5 TMFPs: Count of firms’ responses regarding supply constraints, by firm type and period

Count in number of firms reporting

Period of constraint	U.S. producers	Importers	Purchasers: Domestic	Purchasers: Foreign / imported
2022	0	5	6	1
2023	0	3	3	2
2024 pre-petition	0	5	1	0
2024 post-petition, into 2025	0	8	4	1

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

New suppliers

Nine of 28 purchasers indicated that new suppliers entered the U.S. market since January 1, 2022. Purchasers cited firms such as Genera, Dart, Tellus, Ecosoul and Max Green Packaging in Thailand.

U.S. demand

Based on available information, the overall demand for TMFPs is likely to experience small-to-moderate changes in response to changes in price. The main contributing factors are the somewhat limited range of sustainable substitute products and that TMFPs are usually an item that is a small, necessary cost of doing business so patrons can carry out their purchases. Some of the primary substitutes—expanded polystyrene foam/styrofoam or plastic containers—are becoming increasingly restricted in certain jurisdictions, which may reduce demand elasticity in those areas.

End uses and cost share

Demand for TMFPs derives from end uses. Most are used for food packaging, although their ability to be molded into desired shapes allows them to be used more broadly, such as in consumer and industrial packaging. For foodservice providers, thermoformed molded fiber products can hold in steam and prevent moisture from escaping – allowing them to handle both wet and hot foods without leaking; they also maintains structure, enabling reheating or freezing without disintegrating.⁸ Considering environmental awareness around single-use plastics, molded fiber products have garnered increased attention due to their renewable, recyclable, sustainable, and biodegradable nature. Regulatory actions by cities have also curbed the use of single-use plastics and, further increasing demand for TMFPs.

TMFPs are typically provided to the customers of foodservice firms free of charge and represent a small share of the cost of most sales. TMFPs are typically an end-use good and not generally used as part of any other good, though they can be used to hold frozen foods such as pizzas, as part of consumer and industrial packaging, or for holding fresh ingredients like meat at grocery stores.⁹

Business cycles

Four of 9 U.S. producers, 28 of 40 importers, and 13 of 24 responding purchasers indicated that the market was not subject to business cycles. Of the firms that did report the existence of business cycles, some firms reported some cyclicalities in demand, including lower summer demand from schools, higher demand in warmer months due to increased outdoor dining, and higher demand around the fall holidays. One firm noted that wood pulp, which can be used to manufacture TMFPs, followed multi-year commodity cycles.

Demand trends

Most firms reported that U.S. demand for TMFPs steadily increased or fluctuated upward since January 1, 2022 (table 2.6). Firms reported that demand increased either because of increased interest in sustainability by customers or local or state bans on single-use plastics. Firms reporting decreased demand indicated that demand was affected by promotions of paper plates, tariffs which increased prices, and reduced consumption.

⁸ Petition pp. 22 to 23.

⁹ Ibid., and conference transcript, p. 139 (Davidson).

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

Count in number of firms reporting

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease
Domestic demand	U.S. producers	6	1	1	1	0
Domestic demand	Importers	17	10	5	4	2
Domestic demand	Purchasers	10	5	7	4	0
Foreign demand	U.S. producers	2	0	2	0	0
Foreign demand	Importers	8	4	6	1	1
Foreign demand	Purchasers	4	0	6	0	0

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

Substitute products

A majority of the responding U.S. producers (6 of 9), importers (24 of 38), and purchasers (21 of 25) reported that there are substitutes for TMFPs. Substitutes for TMFPs reported by these firms include: plastic (plastic bowls, polystyrene, styrofoam, PS, PET, PP, rigid plastic); paper (paper plates and bowls, paper board); aluminum; and mineral-filled polypropylene. At the conference, a witness stated that expanded polystyrene foam is the least expensive, then PET plastic, and TMFPs are “typically competitive” with PET items, but TMFPs typically have a “bit of a premium.”¹⁰

Firms were asked specifically if styrofoam, plastic, paperboard, or molded fiber products that are not thermoformed are able to be used as substitutes and in which end use they are typically used in (table 2.7). A majority of all firms reported that the first three products could be used as possible substitutes, and there was a generally even split for molded fiber products that are not thermoformed and for styrofoam. Commonly reported end uses for styrofoam, plastic, paperboard were single use foodservice, and as take out containers.

Commonly reported end uses for molded fiber products that are not thermoformed were as filler flats and egg cartons. Firms noted that this product was not as high quality or as durable as thermoformed, thus it does not perform as well and cannot be made in as consistent a shape and is not used as a single-use foodservice, nor as take out containers.

Plastic was noted by several firms as potentially being used as better liquid and heat-resistant containers or as bakeable containers in ovens. However, firms stated plastic containers were banned in various states for sustainability reasons.

¹⁰ Conference transcript, pp. 57 to 58 (Mascarello).

Paperboard was noted by several firms as competing with sustainability but additional coatings may or may not be sustainable. Firms noted paperboard cannot make the same shapes.

Table 2.7 TMFPs: Count of firms' responses regarding existence of substitute products, by substitute material and firm type

Count in number of firms reporting

Substitute material	Firm type	Yes	No
Styrofoam	U.S. producers	9	3
Styrofoam	Importers	22	22
Styrofoam	Purchasers	16	12
Plastic	U.S. producers	9	3
Plastic	Importers	29	15
Plastic	Purchasers	19	9
Paperboard	U.S. producers	9	3
Paperboard	Importers	25	19
Paperboard	Purchasers	18	10
Molded fiber products that are not thermoformed	U.S. producers	6	6
Molded fiber products that are not thermoformed	Importers	22	22
Molded fiber products that are not thermoformed	Purchasers	14	14

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

Firms were asked how often the products made of the substitute material are able to be substituted for TMFPs in the firm's typical usage (table 2.8). A majority of U.S. producers, importers, and purchasers responded that styrofoam, plastic, and paperboard were sometimes able to be used as a substitute. The majority of U.S. producers, and about half of importers and purchasers reported that molded fiber products that are not thermoformed are never able to be used as a substitute.

Table 2.8 TMFPs: Count of firms responses regarding the frequency of other products able to be substitutes of TMFPs, by substitute material and firm type

Count in number of firms reporting

Substitute material	Firm type	Always able to be a substitute	Usually able to be a substitute	Sometimes able to be a substitute	Never able to be a substitute
Styrofoam	U.S. producers	1	1	4	0
Styrofoam	Importers	1	3	11	8
Styrofoam	Purchasers	0	1	9	8
Plastic	U.S. producers	0	1	4	1
Plastic	Importers	3	4	17	3
Plastic	Purchasers	2	4	12	5
Paperboard	U.S. producers	0	1	4	0
Paperboard	Importers	5	1	14	5
Paperboard	Purchasers	3	0	14	3
Molded fiber products that are not thermoformed	U.S. producers	1	0	0	3
Molded fiber products that are not thermoformed	Importers	2	0	8	7
Molded fiber products that are not thermoformed	Purchasers	0	0	5	6

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

Firms were asked if they received (in the case of U.S. producers and importers) or made (in the case of purchasers) substitution requests to replace TMFPs with other products (table 2.9). A majority of U.S. producers, importers, and purchasers reported that they had not made or received requests to replace TMFPs with other products.

Of the substitution requests made or received several firms mentioned substitutions for lower priced products, or because of availability and market demand. Importer *** reported that “TMFP pricing is too high with the tariff and duties”. It reported that it “switched to black plastic trays instead of a compostable fiber tray which means 6,000,000 black trays will be in landfills”.

U.S. producer *** reported that depending on legislative requirements, customers shift to other perceived sustainable alternatives such as paperboard where there are pricing concerns. Importer *** reported that the closing mechanisms for TMFP clamshells are not always steadfast and various paperboard products offer better closure mechanisms.

Table 2.9 TMFPs: Count of firms reporting experience receiving or making substitution requests to replace TMFPs with other products, by substitute material and firm type

Count in number of firms reporting

Substitute material	Firm type	No substitution request made or received to replace TMFPs with other products	Received or made substitution requests to replace TMFPs with other products
Styrofoam	U.S. producers	4	2
Styrofoam	Importers	22	4
Styrofoam	Purchasers	14	4
Plastic	U.S. producers	4	2
Plastic	Importers	17	10
Plastic	Purchasers	14	7
Paperboard	U.S. producers	5	1
Paperboard	Importers	16	8
Paperboard	Purchasers	14	6
Molded fiber products that are not thermoformed	U.S. producers	5	0
Molded fiber products that are not thermoformed	Importers	22	1
Molded fiber products that are not thermoformed	Purchasers	16	2

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

Firms were asked if the prices of substitute products affect the sales or purchases of TMFPs (table 2.10). A slight majority of U.S. producers reported that the prices of styrofoam did affect their sales; U.S. producers were split in their responses on plastic; and a majority said that paperboard and molded fiber products that are not thermoformed did not affect their sales. The majority of importers reported that the prices of styrofoam, plastic, and paperboard did affect their sales, while a majority stated that prices for molded fiber products that are not thermoformed did not affect their sales. A majority of purchasers reported that the prices of all the various substitute products did not affect their purchases.

For styrofoam products, firms noted that it is generally less expensive if price is a driving factor and if appearance, branding, or regulations are not a priority. U.S. producer *** reported that Styrofoam is approximately half the price of TMFPs.

For plastic products, U.S. producer *** reported that plastic alternatives are approximately 20 percent cheaper than TMFPs. Various firms noted that price sensitive customers result in demand for low priced products.

For paperboard products, U.S. producer *** reported that plastic alternatives are approximately on parity with TMFPs while eight importers reported that paperboard products are generally cheaper. Firms reported that paperboard has the perception of being environmentally acceptable just as TMFPs and so price conscious customers may go with paperboard over TMFPs because of costs.

Table 2.10 TMFPs: Count of firms responses regarding whether the price of substitutes affected sales or purchases of TMFPs, by substitute material and firm type

Count in number of firms reporting

Substitute material	Firm type	No, price of substitutes did not affect sales/ purchases of TMFPs	Yes, price of substitutes affects sales/ purchases of TMFPs
Styrofoam	U.S. producers	3	3
Styrofoam	Importers	11	12
Styrofoam	Purchasers	20	3
Plastic	U.S. producers	3	2
Plastic	Importers	10	13
Plastic	Purchasers	20	3
Paperboard	U.S. producers	3	2
Paperboard	Importers	10	14
Paperboard	Purchasers	20	2
Molded fiber products that are not thermoformed	U.S. producers	3	0
Molded fiber products that are not thermoformed	Importers	14	3
Molded fiber products that are not thermoformed	Purchasers	19	1

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

Substitutability issues

This section assesses the degree to which U.S.-produced TMFPs and imports of TMFPs from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of TMFPs from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced TMFPs and TMFPs imported from subject sources.¹¹ Factors contributing to this level of substitutability include similar quality on a variety of factors, availability, limited preference for particular country of origin or producers, and similarities between domestically produced TMFPs and TMFPs imported from subject countries. Differences limiting substitutability are mostly based on the lack of availability of certain types of TMFPs from domestic producers, a lack of availability of the types that they produce which leads to differences in lead times between TMFPs sourced from domestic producers or importers of subject merchandise, or minimum order quantities. Purchasers cited

¹¹ The degree of substitution between domestic and imported TMFPs depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced TMFPs to the TMFPs imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

limited customization and finishing options (issues include limited color options since U.S. producers only offer natural (no white), limited ability to print on certain parts of the products, and a limited ability for lamination), there were also some reported product performance issues such as oil soaking though certain products.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table 2.11, a plurality of purchasers always make purchasing decisions based on the producer while most customers never make purchasing decisions based on the producer. A plurality of purchasers sometimes make purchasing decisions based on the country of origin while a plurality of their customers never make purchasing decisions based on the country. Of the purchasers that reported that they sometimes or always make decisions based on the manufacturer, firms cited strict qualification processes, quality and breadth of product line, consistency, reliability of supply and cost of their offerings. Firms reported that customer preferences are rarer but can result from quality issues or bad experiences.

Table 2.11 TMFPs: Count of purchasing decisions by purchaser or their customer, based on producer and country of origin

Count in number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	11	2	8	4
Customer	Producer	1	0	4	13
Purchaser	Country	5	3	10	6
Customer	Country	2	1	7	9

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

Importance of purchasing domestic product

Twenty-one of 27 purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Three reported that domestic product was required by law (for 5 to 20 percent of their purchases), three reported it was required by their customers (all for 5 percent of their purchases).

Most important purchase factors

The most often cited major purchasing factors that firms consider in their purchasing decisions for TMFPs were price (21 firms), quality (20 firms), availability (16 firms), product range (9 firms) and supply capacity of the supplier (7 firms) as shown in table 2.12. Price, quality, and availability of supply were the most frequently reported most important factors (7

firms each). Quality was the most frequently reported second-most important factor (9 firms) and price was the most frequently reported third-most important factor (9 firms).

Table 2.12 TMFPs: Count of ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Count in number of firms reporting

Factor	First	Second	Third	Total
Price / Cost	7	6	9	21
Quality	7	9	4	20
Availability / Supply	7	4	7	16
Range / Product Line	5	2	4	9
Capacity	4	3	1	7
All other factors	0	3	2	NA

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

Importance of specified purchase factors

Purchasers were asked to rate the importance of 24 factors in their purchasing decisions (table 2.13). The factors rated as very important by more than half of responding purchasers were availability, product consistency, and reliability of supply (26 each); quality meets industry standards (24 firms); price (23 firms); availability of PFAS-free TMFPs (22 firms); delivery time and quality exceeds industry standards (19 each); compostability certification (18 firms); followed by product range (17 firms); delivery terms and bundling of multiple products (16 each); and finally packaging, technical support/service, and U.S. transportation costs (15 each).

Table 2.13 TMFPs: Count of purchasers' responses regarding importance of purchase factors, by factor

Count in number of firms reporting

Factor	Very important	Somewhat important	Not important
Availability	26	1	0
Product consistency	26	1	0
Reliability of supply	26	1	0
Quality meets industry standards	24	3	0
Price	23	4	0
Availability of PFAS-free TMFPs	22	5	0
Delivery time	19	8	0
Quality exceeds industry standards	19	4	3
Compostability certification	18	6	3
Product range	17	7	3
Bundling of multiple products	16	8	4
Delivery terms	16	9	1
Packaging	15	6	7
Technical support/service	15	7	5
U.S. transportation costs	15	9	3
Minimum quantity requirements	14	8	5
Availability of TMFP lids	13	6	8
Customization	12	6	9
Payment terms	12	10	4
Discounts offered	9	13	5
Laminated products	8	7	12
Mold and tooling costs	6	14	7
Prototyping costs	6	10	11
Printing on TMFPs	4	8	15

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

Lead times

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

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

Supplier certification

Sixteen of 26 responding purchasers require their suppliers to become certified or qualified to sell TMFPs to their firm. Purchasers cited looking at a number of factors such as the financial history and reputability of vendors, site evaluations, confirmation that vendors are compliant with laws and regulations, certifications for compostability, and product reviews. Purchasers reported that the time to qualify a new supplier ranged from 30 to 270 days. Two purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify TMFPs or had lost its approved status since 2022. Purchaser *** reported that ***. Purchaser *** reported that ***.

Minimum quality specifications

As can be seen from table 2.14, 3 of 28 responding purchasers reported that domestically produced products always met minimum quality specifications. Ten of 27 responding purchasers reported that the TMFPs imported from China always met minimum quality specifications and 5 of 26 responding purchasers reported that the TMFPs imported from Vietnam always met minimum quality specifications.

Table 2.14 TMFPs: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Count in number of firms reporting

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	3	11	4	1	10
China	10	8	2	0	7
Vietnam	5	4	1	0	16
Nonsubject sources	2	5	2	0	9

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

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

There were 27 purchasers that reported factors that determined quality, which included grease, oil, water, and heat resistance; strength, durability, lid fit, appearance, and the ability to meet BPI certifications.

Customized TMFP Products

A majority of U.S. producers (5 of 9) reported that they sell TMFPs that are customized for their purchasers, such as unique stamps, prints, embossing, and specialty sizes or shapes. Two U.S. producers reported that customized sales made up between *** percent of their total sales. A majority of responding importers (18 of 39) and responding purchasers (13 of 27) reported that they do not sell or purchase TMFPs that are customized in some way. Six importers reported that 75 percent or more of their sales were of customized TMFPs while eight importers reported that 15 percent or less of their sales of customized TMFPs.

Custom TMFP Molds

A majority of U.S. producers (5 of 9) and importers (18 of 39) offer TMFPs with custom molds. Firms were also asked if their customers were required to pay for the molds (table 2.15).

A majority of U.S. producers (5 of 8) do not charge customers for using or creating molds for custom TMFP products. One U.S. producer *** charges between *** for a custom mold prototype. Two U.S. producers *** charge between *** for a full production mold. U.S. producer *** reported that *** of its yearly sales required purchasers to pay for custom molds or tooling. U.S. producer *** explained that each custom tooling arrangement is different. In certain cases, a customer may wish to purchase the tool outright and upfront. In other cases, a customer may wish to purchase the tool and have the expense be amortized in their purchase

price. In some cases, the firm may split the cost of the tooling investment if the customer is comfortable with the firm offering the SKU to other customers.

A slim majority of importers that offer custom molds (13 of 25) do not charge customers for using or creating molds for custom TMFP products. Eleven importers charge between *** for a custom mold prototype. Twelve importers charge between *** for a full production mold.

Only two importers reported that since January 1, 2022, a purchaser declined to place an order because of the cost of the mold or tooling. In both instances the importers (***) reported that the purchasers were small businesses where even with the low costs (***) the customers decided it was cost prohibitive.

A majority of purchasers (18 of 26 firms) reported that they do not purchase molds specific to their firms and that they only purchase stock TMFPs. Of the 8 purchasers that do require new molds, responses were evenly split on whether they were required to pay for the molds in all countries except Vietnam, which a slight majority, 3 of 5, charges for new mold.

Table 2.15 TMFPs: U.S. producer, importer, and purchaser response regarding payment for new molds for custom TMFP products, by firm type

Count in number of firms reporting

Firm Type	Require customer / Required to pay for molds? Yes	Require customer / Required to pay for molds? No
Producer	3	5
Importers	12	13
Purchasers: United States	2	2
Purchasers: China	3	3
Purchasers: Vietnam	2	3
Purchasers: Nonsubject sources	1	3

Minimum order quantities

Producers, importers, and purchasers were asked whether suppliers of TMFPs typically have minimum order sizes for the TMFPs they buy or sell. A slim minority of U.S. producers (4 of 9) and a little over half of responding importers (20 of 39) indicated that they typically do not have minimum order requirements. A small majority of purchasers also reported that both producers and importers do not have minimum order size requirements (table 2.16).

Table 2.16 TMFPs: U.S. producer, importer, and purchaser response regarding the existence of minimum order size requirements, by firm type

Count in number of firms reporting

Firm Type	No	Yes
Producer	4	5
Importers	19	20
Purchasers: U.S. producers	13	12
Purchasers: Importers	14	9

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

Changes in purchasing patterns

Seventeen purchasers reported that they had changed suppliers since January 1, 2022, while 9 reported that they had not. Purchasers named a wide variety of firms that were dropped and added with no general trends. Firms were dropped or saw reduced purchases due to pricing, tariffs, limited availability, and inconsonant shipping performance. Firms added or increased purchases due to diversification of sources, brand recognition, unique or new offerings, and freight efficiency.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2022 (table 2.17). The majority of purchasers reported increased purchases of U.S.-produced product because of better supply and availability; and increase in demand of TMFPs due to bans on foam, plastics, etc., and sustainability goals. A plurality of purchasers reported decreased purchases of product from China largely because of tariffs and competition from other sources. Purchasers reported increased purchases of product from Vietnam because of increased demand for TMFPs. Purchasers reported increased purchases of product from nonsubject countries because of more demand for fibers-based products and shifting away from China due to tariffs.

Table 2.17 TMFPs: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	7	5	5	2	2	4
China	5	3	5	4	8	0
Vietnam	3	2	4	1	2	7
Nonsubject Sources	2	5	5	2	2	4
Sources Unknown	4	2	4	2	1	7

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

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

Purchasers were asked a number of questions comparing TMFPs produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 24 factors (table 2.18) for which they were asked to rate the importance.

A majority of purchasers reported that U.S. produced TMFPs were superior on one factor (delivery time) when compared to TMFPs imported from China and Vietnam. Most purchasers reported that U.S. produced TMFPs and TMFPs imported from China were comparable on 11 of the 24 factors (compostability certification, delivery terms, discounts offered, packaging, payment terms, product consistency, quality meets industry standards, quality exceeds industry standards, reliability of supply, technical support/service, and U.S. transportation costs). Most purchasers reported that U.S. produced TMFPs and TMFPs imported from Vietnam were comparable on 11 of the 24 factors (availability of PFAS-free TMFPs, bundling of multiple products, compostability certification, delivery terms, discounts offered, packaging, payment terms, product consistency, quality meets industry standards, quality exceeds industry standards, U.S. transportation costs).

A majority of purchasers reported that U.S.-produced TMFPs were inferior on 11 of the 24 purchasing factors when compared to Chinese imports (availability, availability of TMFP lids, bundling of multiple products, customization, laminated products, minimum quantity requirements, mold and tooling costs, price, printing on TMFPs, product range, and prototyping costs). Purchasers were split on whether U.S.-produced TMFPs were inferior or comparable to Chinese imports on availability of PFAS-free TMFPs.

A majority of purchasers reported that U.S. produced TMFPs were inferior on 11 of the 24 purchasing factors when compared to Vietnamese imports (availability, availability of TMFP lids, customization, laminated products, mold and tooling costs, price, printing on TMFPs, product range, prototyping costs, reliability of supply, and technical support/service). Purchasers were split on whether U.S.-produced TMFPs were inferior or comparable to Vietnamese imports on minimum quantity requirements.

A majority of purchasers reported that TMFPs imported from China were comparable to TMFPs imported from Vietnam for all purchasing factors.

All purchasers reported that TMFPs imported from China and Vietnam were at least comparable if not superior to TMFPs imported from nonsubject sources for all purchasing factors. On the other hand, a majority of purchasers reported that U.S. produced TMFPs were inferior to nonsubject imports on 10 factors (availability, availability of TMFP lids, bundling of

multiple products, customization, laminated products, mold and tooling costs, price, printing on TMFPs, product range, and prototyping costs). On the other 13 factors, a majority of purchasers rated U.S. produced TMFPs as comparable to nonsubject imports; one factor had responses split between superior and comparable (delivery terms).

Table 2.18 TMFPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs China	0	9	11
Availability of TMFP lids	U.S. vs China	0	5	12
Availability of PFAS-free TMFPs	U.S. vs China	2	8	8
Bundling of multiple products	U.S. vs China	1	6	10
Compostability certification	U.S. vs China	1	18	0
Customization	U.S. vs China	0	4	12
Delivery terms	U.S. vs China	7	10	2
Delivery time	U.S. vs China	11	7	2
Discounts offered	U.S. vs China	1	9	4
Laminated products	U.S. vs China	0	6	7
Minimum quantity requirements	U.S. vs China	1	8	11
Mold and tooling costs	U.S. vs China	0	6	11
Packaging	U.S. vs China	2	14	3
Payment terms	U.S. vs China	3	15	2
Price	U.S. vs China	0	4	15
Printing on TMFPs	U.S. vs China	0	3	8
Product consistency	U.S. vs China	1	14	4
Product range	U.S. vs China	0	6	13
Prototyping costs	U.S. vs China	0	3	7
Quality meets industry standards	U.S. vs China	1	16	4
Quality exceeds industry standards	U.S. vs China	2	13	3
Reliability of supply	U.S. vs China	2	11	6
Technical support/service	U.S. vs China	2	11	4
U.S. transportation costs	U.S. vs China	6	11	1

Table continued.

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

Table 2.18 (Continued) TMFPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Vietnam	0	5	6
Availability of TMFP lids	U.S. vs Vietnam	0	3	6
Availability of PFAS-free TMFPs	U.S. vs Vietnam	0	5	4
Bundling of multiple products	U.S. vs Vietnam	0	5	4
Compostability certification	U.S. vs Vietnam	0	11	0
Customization	U.S. vs Vietnam	0	4	6
Delivery terms	U.S. vs Vietnam	3	6	2
Delivery time	U.S. vs Vietnam	5	4	2
Discounts offered	U.S. vs Vietnam	1	6	1
Laminated products	U.S. vs Vietnam	0	2	6
Minimum quantity requirements	U.S. vs Vietnam	0	6	6
Mold and tooling costs	U.S. vs Vietnam	0	2	7
Packaging	U.S. vs Vietnam	1	7	2
Payment terms	U.S. vs Vietnam	3	5	3
Price	U.S. vs Vietnam	1	0	11
Printing on TMFPs	U.S. vs Vietnam	0	1	5
Product consistency	U.S. vs Vietnam	0	6	5
Product range	U.S. vs Vietnam	0	2	9
Prototyping costs	U.S. vs Vietnam	0	3	4
Quality meets industry standards	U.S. vs Vietnam	0	10	2
Quality exceeds industry standards	U.S. vs Vietnam	0	9	1
Reliability of supply	U.S. vs Vietnam	2	3	4
Technical support/service	U.S. vs Vietnam	2	2	5
U.S. transportation costs	U.S. vs Vietnam	2	5	3

Table continued.

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

Table 2.18 (Continued) TMFPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	China vs. Vietnam	3	8	0
Availability of TMFP lids	China vs. Vietnam	1	7	0
Availability of PFAS-free TMFPs	China vs. Vietnam	2	6	1
Bundling of multiple products	China vs. Vietnam	0	9	0
Compostability certification	China vs. Vietnam	0	10	0
Customization	China vs. Vietnam	1	8	0
Delivery terms	China vs. Vietnam	1	10	0
Delivery time	China vs. Vietnam	2	9	0
Discounts offered	China vs. Vietnam	1	7	0
Laminated products	China vs. Vietnam	0	7	0
Minimum quantity requirements	China vs. Vietnam	0	11	0
Mold and tooling costs	China vs. Vietnam	1	7	0
Packaging	China vs. Vietnam	1	9	0
Payment terms	China vs. Vietnam	0	10	0
Price	China vs. Vietnam	4	7	0
Printing on TMFPs	China vs. Vietnam	0	4	0
Product consistency	China vs. Vietnam	0	9	1
Product range	China vs. Vietnam	1	9	0
Prototyping costs	China vs. Vietnam	0	6	0
Quality meets industry standards	China vs. Vietnam	0	11	0
Quality exceeds industry standards	China vs. Vietnam	0	8	0
Reliability of supply	China vs. Vietnam	1	8	0
Technical support/service	China vs. Vietnam	0	7	0
U.S. transportation costs	China vs. Vietnam	0	7	1

Table continued.

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

Table 2.18 (Continued) TMFPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs nonsubject	0	3	4
Availability of TMFP lids	U.S. vs nonsubject	0	2	4
Availability of PFAS-free TMFPs	U.S. vs nonsubject	0	4	3
Bundling of multiple products	U.S. vs nonsubject	0	3	4
Compostability certification	U.S. vs nonsubject	0	7	0
Customization	U.S. vs nonsubject	0	1	5
Delivery terms	U.S. vs nonsubject	3	3	0
Delivery time	U.S. vs nonsubject	2	4	1
Discounts offered	U.S. vs nonsubject	1	3	1
Laminated products	U.S. vs nonsubject	0	2	3
Minimum quantity requirements	U.S. vs nonsubject	0	3	2
Mold and tooling costs	U.S. vs nonsubject	0	2	4
Packaging	U.S. vs nonsubject	0	5	2
Payment terms	U.S. vs nonsubject	1	5	1
Price	U.S. vs nonsubject	0	2	5
Printing on TMFPs	U.S. vs nonsubject	0	1	3
Product consistency	U.S. vs nonsubject	0	6	1
Product range	U.S. vs nonsubject	0	2	5
Prototyping costs	U.S. vs nonsubject	0	2	3
Quality meets industry standards	U.S. vs nonsubject	0	6	1
Quality exceeds industry standards	U.S. vs nonsubject	0	4	2
Reliability of supply	U.S. vs nonsubject	1	3	2
Technical support/service	U.S. vs nonsubject	1	3	1
U.S. transportation costs	U.S. vs nonsubject	1	4	1

Table continued.

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

Table 2.18 (Continued) TMFPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	China vs nonsubject	5	4	0
Availability of TMFP lids	China vs nonsubject	5	4	0
Availability of PFAS-free TMFPs	China vs nonsubject	4	5	0
Bundling of multiple products	China vs nonsubject	4	5	0
Compostability certification	China vs nonsubject	3	6	0
Customization	China vs nonsubject	4	4	0
Delivery terms	China vs nonsubject	3	5	0
Delivery time	China vs nonsubject	3	6	0
Discounts offered	China vs nonsubject	3	4	0
Laminated products	China vs nonsubject	3	4	0
Minimum quantity requirements	China vs nonsubject	3	5	0
Mold and tooling costs	China vs nonsubject	4	4	0
Packaging	China vs nonsubject	4	5	0
Payment terms	China vs nonsubject	2	7	0
Price	China vs nonsubject	5	3	0
Printing on TMFPs	China vs nonsubject	3	4	0
Product consistency	China vs nonsubject	3	6	0
Product range	China vs nonsubject	5	4	0
Prototyping costs	China vs nonsubject	3	4	0
Quality meets industry standards	China vs nonsubject	3	6	0
Quality exceeds industry standards	China vs nonsubject	3	5	0
Reliability of supply	China vs nonsubject	5	4	0
Technical support/service	China vs nonsubject	2	6	0
U.S. transportation costs	China vs nonsubject	2	5	0

Table continued.

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

Table 2.18 (Continued) TMFPs: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Vietnam vs nonsubject	3	2	0
Availability of TMFP lids	Vietnam vs nonsubject	2	2	0
Availability of PFAS-free TMFPs	Vietnam vs nonsubject	3	2	0
Bundling of multiple products	Vietnam vs nonsubject	3	2	0
Compostability certification	Vietnam vs nonsubject	3	2	0
Customization	Vietnam vs nonsubject	3	2	0
Delivery terms	Vietnam vs nonsubject	3	2	0
Delivery time	Vietnam vs nonsubject	2	3	0
Discounts offered	Vietnam vs nonsubject	2	1	0
Laminated products	Vietnam vs nonsubject	2	1	0
Minimum quantity requirements	Vietnam vs nonsubject	3	2	0
Mold and tooling costs	Vietnam vs nonsubject	3	1	0
Packaging	Vietnam vs nonsubject	3	2	0
Payment terms	Vietnam vs nonsubject	2	3	0
Price	Vietnam vs nonsubject	3	2	0
Printing on TMFPs	Vietnam vs nonsubject	3	1	0
Product consistency	Vietnam vs nonsubject	3	2	0
Product range	Vietnam vs nonsubject	3	2	0
Prototyping costs	Vietnam vs nonsubject	3	1	0
Quality meets industry standards	Vietnam vs nonsubject	3	2	0
Quality exceeds industry standards	Vietnam vs nonsubject	3	2	0
Reliability of supply	Vietnam vs nonsubject	3	2	0
Technical support/service	Vietnam vs nonsubject	2	2	0
U.S. transportation costs	Vietnam vs nonsubject	2	1	0

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

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

Comparison of U.S.-produced and imported TMFPs

In order to determine whether U.S.-produced TMFPs can generally be used in the same applications as imports from China and Vietnam, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table 2.19, a majority of U.S. producers reported that TMFPs from both China and Vietnam were always interchangeable with TMFPs from the United States.

As shown in table 2.20, importers responses on the interchangeability of TMFPs from the United States, China, Vietnam, and nonsubject countries were mixed. However, a majority

of importers reported product from China and Vietnam are always or frequently interchangeable with each other.

As shown in table 2.21, the majority of purchasers reported that TMFPs from China and Vietnam were always or frequently interchangeable with TMFPs from the United States.

Table 2.19 TMFPs: Count of U.S. producers reporting interchangeability between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	7	1	0	1
United States vs. Vietnam	6	1	0	1
China vs. Vietnam	6	1	0	1
United States vs. Other	4	2	0	1
China vs. Other	5	1	0	1
Vietnam vs. Other	5	1	0	1

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

Table 2.20 TMFPs: Count of importers reporting interchangeability between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	13	5	12	3
United States vs. Vietnam	7	4	10	2
China vs. Vietnam	7	7	4	2
United States vs. Other	4	3	9	2
China vs. Other	4	3	7	1
Vietnam vs. Other	5	3	5	1

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

Table 2.21 TMFPs: Count of purchasers reporting interchangeability between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	7	6	8	1
United States vs. Vietnam	5	5	5	1
China vs. Vietnam	5	5	4	0
United States vs. Other	6	2	3	1
China vs. Other	5	4	3	0
Vietnam vs. Other	4	4	1	0

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

Importers noted a number of issues that lead to decreased interchangeability with domestic product. These include: issues with domestic product range as well as domestic quality/performance (noted by 7 importers), consistently available domestic product (3

importers), domestic capacity (2 importers), as well as domestic ability to offer small runs, product specifications (e.g., shape, dimension, color, chemistry, weight), domestic mold tooling costs,¹² a lack of PLA lamination domestically, and domestic difficulty in custom printing on small runs (1 importer each).

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of TMFPs from the United States, subject, or nonsubject countries (tables 2.22 to 2.24). Most U.S. producers reported that there were sometimes or never differences other than price for all country pairs; one U.S. producer reported that there were frequently differences other than price between U.S. TMFPs and those produced in the subject countries and between China and Vietnam. A majority of importers and purchasers indicated that there are always or frequently factors other than price that were significant between TMFPs imported from subject countries and those produced in the United States. In addition to mentioning factors previously mentioned when discussing issues limiting interchangeability, importers also pointed to differences in lead times, freight costs, tariffs, purchaser-specific requirements regarding durability in demanding environments, certification, the willingness of manufacturers to offer white-label products tailored to a requested order volume, product design, brand, relationships, product appearance, access to distribution, high oven heat resistance, the range of products that are complementary to TMFP products (e.g., aluminum or plastic bowl lids), and a lack of domestic tooling for needed products.

¹² One interested party witness testified that the cost for a production tool domestically was \$175,000 to 225,000 per mold, compared with \$20,800 per mold in China. Conference transcript, pp 136 to 137 and 169 (Davidson).

Table 2.22 TMFPs: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	1	3	5
United States vs. Vietnam	0	1	2	5
China vs. Vietnam	0	1	2	5
United States vs. Other	0	1	3	3
China vs. Other	0	1	2	4
Vietnam vs. Other	0	1	2	4

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

Table 2.23 TMFPs: Count of importers reporting the significance of differences other than price between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	10	8	11	4
United States vs. Vietnam	4	5	10	3
China vs. Vietnam	2	6	9	4
United States vs. Other	7	3	11	0
China vs. Other	3	1	13	2
Vietnam vs. Other	1	1	12	2

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

Table 2.24 TMFPs: Count of purchasers reporting the significance of differences other than price between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	13	7	1	2
United States vs. Vietnam	9	5	0	1
China vs. Vietnam	9	3	1	2
United States vs. Other	7	3	0	2
China vs. Other	5	3	2	2
Vietnam vs. Other	4	2	1	1

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

Elasticity estimates

This section discusses elasticity estimates; parties are encouraged to comment on these estimates and should do so as an attachment to their prehearing or posthearing brief.

U.S. supply elasticity

The domestic supply elasticity for TMFPs measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of TMFPs. The elasticity of

domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced TMFPs. Analysis of these factors above indicates that the U.S. industry has the ability to moderately to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 7 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for TMFPs measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of TMFPs. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the TMFPs in the production of any downstream products. Based on the available information, the aggregate demand for TMFPs is likely to be slightly inelastic; a range of -0.75 to -1.0 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.¹³ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced TMFPs and imported TMFPs is likely to be moderate-to-high in the range of 3 to 6. Factors contributing to this level of substitutability include similar quality on a variety of factors, availability, and lead times; limited preference for particular country of origin or producers; and similarities between domestically produced TMFPs and TMFPs imported from subject countries. Differences limiting substitutability are mostly based on the lack of availability of certain types of TMFPs from domestic producers, a lack of availability of the types that they produce which leads to differences in lead times between TMFPs sourced from domestic producers or importers of subject merchandise, or minimum order quantities. There are some concerns about the high mold and prototyping costs by U.S. producers, limited customization and finishing options (issues include limited color options since U.S. producers only offer natural (no white), limited ability to print on certain

¹³ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

parts of the products, and a limited ability for lamination), there were also some reported product performance issues such as oil soaking though certain products.

Part 3: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins were presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of seven firms that accounted for a majority of U.S. production of TMFPs during 2024.

U.S. producers

The Commission issued a U.S. producer questionnaire to 31 firms that produce TMFPs and/or other MFPs based on information contained in the petitions, and staff research. 12 firms provided usable data on their operations, nine of which reported producing TMFPs in the United States.¹

¹ *** reported producing both TMFPs and other MFPs. However, *** did not submit any data on its production of other MFPs. *** reported only producing other MFPs and their data is presented only in Appendix F.

Table 3.1 lists U.S. producers of TMFPs, their production locations, positions on the petition, and shares of total production. *** represents about *** percent of the U.S. industry of TMFPs and therefore, largely drives the trends of the TMFP industry in the United States while the petitioners represent approximately *** percent of U.S. production of TMFPs.

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

Firm	Position on petition	Production location(s)	Share of production
Dart	***	Mason, MI Lancaster, PA	***
Genera	Petitioner	Vonore, TN	***
Huhtamaki	***	Waterville, ME Sacramento, CA Hammond, IN Albertville, AL	***
Kanbol	***	Auburn, KY	***
Pactiv	***	Macon, GA Moorhead, MN City of Industry, CA Plattsburg, NY	***
Reynolds	***	Red Bluff, CA	***
Sabert	***	Greenville, TX	***
Tekni-Plex	***	Tacoma, WA Van Wert, OH Wenatchee, WA	***
Tellus	Petitioner	Belle Glade, FL	***
All firms	Various	Various	100.0

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

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

Table 3.2 presents information on U.S. producers' of TMFPs ownership, related and/or affiliated firms. As indicated in table 3.2, two U.S. producers are related to foreign producers of the subject merchandise, as *** and ***. Three U.S. producers *** are related to U.S. importers of TMFPs. In addition, as discussed in greater detail below, five U.S. producers directly import the subject merchandise and one, ***, purchased the subject merchandise from a U.S. importer.²

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

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

Source: Compiled from data submitted in response to Commission questionnaires. Email from ***, September 2, 2025.

² The five U.S. producers that imported the subject merchandise are ***.

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

Table 3.3 TMFPs: Events in the U.S. industry since January 1, 2022.

Item	Firm	Event
Expansion	Huhtamaki North America	In May 2022, Huhtamaki North America announced the expansion of its Hammond, Indiana facility to add capacity for its molded fiber products. The expansion will add 250,000 square feet to the facility and will create about 100 jobs.
Acquisition	Genera, Inc. and Ara Partners	In June 2022, private equity firm Ara Partners acquired Genera, Inc. (based in Vonore, TN). Ara committed to adding \$200 million of capital to support expansion of Genera's sustainable pulp and packaging business.
Acquisition	Genera, Inc. and MxG Fiber LLC	In July 2022, Genera acquired MxG Fiber LLC as part of its growth strategy. MxG has 3 manufacturing facilities across the Midwest that brought several products to market over the past decade, including the first molded fiber products produced from Miscanthus. In addition to the acquisition, MxG's CEO Matt Griswold joined Genera as Vice President, focusing on molded fiber product and market development.
Closure	Footprint LLC	In March 2023, Footprint LLC ceased operations at its Richburg, SC 109,000-square-foot facility.
Acquisition	Genera, Inc. and Zume Inc.	In September 2023, Genera acquired the assets of molded fiber manufacturer and equipment supplier Zume Inc. The purchase includes all Zume assets held in Camarillo, CA, including thermoforming equipment, supporting systems and related auxiliary items.
New Facility	Tanbark Molded Fiber Products	In October 2023, Tanbark Molded Fiber Products launched its new facility in Saco, ME.
Expansion	Genera, Inc.	In December 2023, Genera announced an expansion of its Vonore, TN, Sustainable Biomaterials Campus. The expansion adds more than 150,000 square feet to Genera's existing facility and will house more than 60 robotic thermoforming machines, a fleet of autonomously guided vehicles, and automated packaging lines. The expansion was completed in July 2025.

Item	Firm	Event
New Facility	Kanbol, Inc.	In December 2023, the Governor of Kentucky announced that Kanbol is investing over \$10 million in Logan County, creating 40 new jobs and would receive a tax incentive from the state. Kanbol would expand its operations to set up an integrated facility with pulp production and paper products in Logan County, KY.
Acquisition	ASR Group, Florida Crystals, and Tellus Holdings	As of August 30, 2024, ASR and Florida Crystals (based in West Palm Beach, FL) have acquired sole ownership of Tellus Products, LLC (Belle Glade, FL).
Acquisition	Novolex, Pactiv Evergreen	In April 2025, Novolex completed its \$6.7 billion acquisition of Pactiv Evergreen Inc. Novolex is a leading manufacturer of food, beverage, and specialty packaging. In acquiring Pactiv, Novolex's expanded footprint now includes over 250 brands of fiber and plastic packaging products.

Sources: Kamczyc, A., Recycling Today, "Huhtamaki announces \$100M expansion of Hammond, Indiana, facility", <https://www.recyclingtoday.com/news/huhtamaki-invests-100-million-hammond-indiana/>, retrieved October 22, 2024; Genera, "Ara Partners acquires Genera," <https://generainc.com/ara-partners-acquires-genera/>, retrieved October 22, 2024; Genera, "Genera Acquires MxG Fiber," <https://generainc.com/genera-acquires-mxg-fiber/>, retrieved October 22, 2024. Preliminary Conference transcript (Serafini), pp. 26; Genera, "Genera continues expansion with acquisition of Zume assets," <https://generainc.com/genera-continues-expansion-with-acquisition-of-zume-assets/>, retrieved October 22, 2024; Homer, Ted, Fox23, "Sustainable packaging company launches in Saco", <https://fox23maine.com/newsletter-daily/sustainable-packaging-company-launches-saco-tanbark-molded-fiber-products>, retrieved October 22, 2024; Genera, "Genera announces \$340+ million investment in Sustainable Biomaterials Campus," <https://generainc.com/genera-announces-340-million-investment-in-sustainable-biomaterials-campus/>, retrieved October 22, 2024; Genera, "Genera Celebrates Completion of \$340+ Million State-of-the-Art American Manufacturing Facility," <https://generainc.com/genera-celebrates-completion-of-340-million-state-of-the-art-american-manufacturing-facility/>, retrieved August 20, 2025. Office of the Governor, Kentucky, "Gov. Beshear announces \$160 million in new business investment, creating 740 full-time jobs for Kentuckians," <https://www.kentucky.gov/Pages/Activity-stream.aspx?n=GovernorBeshear&prId=2047>, retrieved October 22, 2024; Kentucky Economic Development Finance Authority, "Board Meeting Minutes, December 7, 2023," https://cedky.com/cdn/140_December_2023_Minutes.pdf, retrieved November 5, 2024; Preliminary Conference transcript (Tiller), pp. 11, 14-15 Novolex, "Novolex and Pactiv Evergreen Inc. Complete Combination", <https://novolex.com/blog/novolex-and-pactiv-evergreen-inc-complete-combination-creating-a-leading-manufacturer-in-food-beverage-and-specialty-packaging/>, retrieved September 10, 2025.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of TMFPs since 2022. Seven of nine producers indicated in their questionnaires that they had experienced such changes. The TMFP industry in the United States saw two new entrants during 2022 to March 2025: ***.³ Table 3.4 presents the changes identified by these producers.

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

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

³ *** U.S. Producer Questionnaire, question II-11.

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

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

U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. TMFP producers' installed and practical capacity and production on the same equipment. No producer reported out-of-scope production on the same equipment. U.S. producers' installed overall capacity and practical capacity both increased yearly during 2022 to 2024 and were higher in interim 2025 compared to interim 2024. Installed overall and practical overall capacity utilization both decreased yearly from 2022 to 2024 and were both lower in interim 2025 than in interim 2024.

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

Capacity and production in 1,000 pounds; utilization in percent; Interim period is January through March

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

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

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

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

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Storage capacity	***
Logistics/transportation	***
Lack of molds	***
Lack of molds	***
Lack of molds	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table 3.7 and figures 3.1 and 3.2 present U.S. producers' production, capacity, and capacity utilization.^{4 5} U.S. producers' practical capacity increased yearly from 2022 to 2024, increasing overall by *** percent, with nearly all of the increase occurring from 2023 to 2024 as *** reported an increase or constant capacity from 2023 to 2024.^{6 7} Contributing to the increase in capacity from 2022 to 2024 was a result of two new firms entering the market, ***.⁸ Additionally, each U.S. producer's capacity was higher, or constant, in interim 2025 than in interim 2024, largely led by ***.⁹ Production, on the other hand, decreased yearly from 2022 to 2024, decreasing by *** percent from 2022 to 2024.¹⁰ Production decreased slightly between interim 2024 and interim 2025 as the increase in production by ***. As a result, U.S. producers' average capacity utilization decreased yearly, from *** percent in 2022 to *** percent in 2024 and was *** percentage points lower in interim 2025 than in interim 2024.

⁴ For the purposes of this report, Huhtamaki, Reynolds, and Pactiv are considered established producers of TMFPs. These three firms accounted for the vast majority of U.S. producers' capacity and production. The newer U.S. producers largely drove the increase in capacity from 2022 to 2024 as the capacity of established producers remains relatively constant from 2022 to 2024. The production of newer U.S. producers increased from 2022 to 2024, while the production of the established producers decreased over the same period.

⁵ ***. Email from ***, September 3, 2025.

⁶ ***. *** U.S. Producers' questionnaire response, question 2.2.

⁷ ***.

⁸ *** U.S. Producers' questionnaire response, question 2.2.

⁹ *** U.S. Producers' Questionnaire response, question 2.2.

¹⁰ The decrease in production from 2023 to 2024 was nearly entirely driven by ***. Email from ***, August 22, 2025.

Table 3.7 TMFPs: U.S. producers' output, by firm and period**Practical capacity**

Capacity in 1,000 pounds; interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

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

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.7 (Continued) TMFPs: U.S. producers' output, by firm and period**Capacity utilization**

Capacity utilization in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 3.7 (Continued) TMFPs: U.S. producers' output, by firm and period**Share of production**

Share of production in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

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

Figure 3.1 TMFPs: U.S. producers' output, by period

* * * * *

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

Figure 3.2 TMFPs: Established producers' vs. Newer producers' capacity and production

* * * * *

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

Alternative products

No responding U.S. producer reported production of other products using the same equipment to produce TMFPs.

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

Table 3.8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for nearly all U.S. producers' total shipments from during the period for which data were collected, accounting for over *** percent of total shipments in each year and the interim periods.¹¹ The quantity of their U.S. shipments decreased yearly, overall decreasing by *** percent from 2022 to 2024 but was *** percent higher in interim 2025 compared to interim 2024. The decrease reflects ***.¹² The value of U.S. producers' U.S. shipments fluctuated, increasing from 2022 to 2023 and decreasing from 2023 to 2024, overall decreasing by *** percent from 2022 to 2024 and was higher in interim 2025 compared to interim 2024. The average unit value of U.S. producers' U.S. shipments increased in each year from 2022 to 2024 as value increased at a faster rate than quantity, increasing overall by *** percent from 2022 to 2024 but was slightly lower in interim 2025 compared to interim 2024.

By quantity, export shipments accounted for less than *** percent of total shipments in each year during 2022 to 2024 and the interim periods, and only *** out of nine firms reported any export shipments. The quantity of export shipments decreased irregularly, as they decreased from 2022 to 2023 and increased from 2023 to 2024, ending 2024 *** percent lower than in 2022 and was *** percent higher in interim 2025 compared to interim 2024.¹³ The value of U.S. producers' export shipments increased yearly from 2022 to 2024, overall increasing by *** percent and was *** percent higher in interim 2025 compared to interim 2024. The unit value of their export shipments increased yearly, ending 2024 *** percent higher than in 2022 but was *** percent lower in interim 2025 than in interim 2024.¹⁴

¹¹ *** reported small quantities of internal consumption in 2024 and interim 2025. No firm reported transfers to related firms.

¹² ***.

¹³ ***. Email from ***, August 22, 2025.

¹⁴ Unit value of export shipments increased as ***.

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

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

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

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

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

U.S. producers' inventories

Table 3.9 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' end-of-period inventories increased yearly between 2022 and 2024, overall increasing by *** percent and was higher in interim 2025 compared to interim 2024.¹⁵ The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments each increased overall during 2022 to 2024, ending 2024 *** percentage points, *** percentage points, and *** percentage points higher, respectively. Similarly, ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments each were higher in interim 2025 compared to interim 2024.

Table 3.9 TMFPs: U.S. producers' inventories and their ratio to select items, by period

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

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

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

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

¹⁵ ***. Email from ***, August 22, 2025.

U.S. producers' imports from subject sources

U.S. producers' imports of TMFPs are presented in tables 3.10 through 3.14. *** imported TMFPs from subject sources during 2022 to June 2025. As ***, its ratio of imports from China to production was *** percent in 2023. Additionally, *** ratio of production to its U.S. production was *** percent in 2022 as it **. Table 3.15 presents these U.S. producers' reasons for importing.

Table 3.10 TMFPs: *'s U.S. production, U.S. imports from subject sources, and ratio of subject imports to production, by period**

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

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

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

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

Table 3.11 TMFPs: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

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

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

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

Table 3.12 TMFPs: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

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

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from Vietnam	Quantity	***	***	***	***	***
Imports from China to U.S. production	Ratio	***	***	***	***	***
Imports from Vietnam to U.S. production	Ratio	***	***	***	***	***

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

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

Table 3.13 TMFPs: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

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

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

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

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

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

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

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

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

Table 3.15 TMFPs: U.S. producers' reasons for importing

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

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

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

U.S. producers' purchases of imports from subject sources are presented in table 3.16.

*** reported purchases of imports from *** in 2024 and interim 2025.

Table 3.16 TMFPs: *'s purchases of imports from subject sources, by source, importer of record, and period**

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

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

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

U.S. employment, wages, and productivity

Tables 3.17 through 3.19 show established producers, newer producers, and all U.S. TMFP producers' employment-related data.¹⁶ For all U.S. TMFP producers, the number of production and related workers ("PRWs") increased by *** percent from 2022 to 2024 and was slightly higher in interim 2025 than in interim 2024.^{17 18} Productivity decreased yearly from 2022 to 2024 and was *** percent lower in 2024 than in 2022 and was lower in interim 2025 than in interim 2024. Unit labor costs, total hours worked, wages paid, and hours worked per PRW conversely, all increased in every year from 2022 to 2024, and were higher in interim 2025 than in interim 2024. Hourly wages increased overall from 2022 to 2024 and were higher in interim 2025 compared to interim 2024.

Table 3.17 TMFPs: Established U.S. producers' employment related information, by item and period

Interim is January through March

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

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

¹⁶ For the purposes of this report, Huhtamaki, Reynolds, and Pactiv are considered established producers of TMFPs and their aggregate employment data are shown in Table 3.17. The remaining U.S. producers are considered newer producers of TMFPs in the U.S. and their data is presented in Table 3.18. The established producers have a *** productivity and *** unit cost then the new entrant producers in each year from 2022 to 2024 and the interim periods. Productivity *** for both new entrants and established firms from 2022 to 2024.

¹⁷ ***. *** U.S. Producers' questionnaire response, question 2.11.

¹⁸ ***.

Table 3.18 TMFPs: Newer U.S. producers' employment related information, by item and period

Interim is January through March

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

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

Table 3.19 TMFPs: Aggregate U.S. producers' employment related information, by item and period

Interim is January through March

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

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

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

U.S. importers

The Commission issued importer questionnaires to 158 firms believed to be importers of subject TMFPs, as well as to all U.S. producers of TMFPs.¹ Usable questionnaire responses were received from 44 companies, representing approximately 70 percent of U.S. imports from China, nearly all U.S. imports from Vietnam, and approximately 25 percent of U.S. imports from nonsubject firms in 2024 under HTS subheading 4823.70.0020 and 4823.70.0040, a “basket” category.² ³ Table 4.1 lists all responding U.S. importers of TMFPs from China and Vietnam and other sources, their locations, and their shares of U.S. imports, in 2024. Grahm

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

² Staff believes the coverage figure for nonsubject sources is understated and the questionnaire responses represent a majority of imports from nonsubject sources. Importer questionnaires were received from ***.

³ 44 firms reported importing all molded fiber products, eight of which reported importing other MFPs. *** firms reported importing both TMFPs and other MFPs and *** firms reported only importing other MFPs. *** firms submitted an importers questionnaire certifying they did not import TMFPs other MFPs since January 1, 2022.

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

Share in percent

Firm	Headquarters	China	Vietnam	Subject Sources	Nonsubject Sources	All import sources
AmerCareRoyal	Exton, PA	***	***	***	***	***
Anchor	Ballwin, MO	***	***	***	***	***
ARC Customs	Laredo, TX	***	***	***	***	***
Banyan	Melville, NY	***	***	***	***	***
Berk	Warren, OH	***	***	***	***	***
Better Earth	Clarkston, GA	***	***	***	***	***
Bunzl	St. Louis, MO	***	***	***	***	***
Cascades	Piscataway, NJ	***	***	***	***	***
CKF	Hantsport Canada, NS	***	***	***	***	***
Clark Core	Lancaster, PA	***	***	***	***	***
Corapak	City Of Industry, CA	***	***	***	***	***
Dart	Mason, MI	***	***	***	***	***
DolGen	Goodlettsville, TN	***	***	***	***	***
Eco Guardian	Raleigh, NC	***	***	***	***	***
Eco Kloud	Fremont, CA	***	***	***	***	***
Eco-Products	Charlotte, NC	***	***	***	***	***
Five Food	Moses Lake, WA	***	***	***	***	***
Footprint	Mexicali, MX	***	***	***	***	***
Genpak	Charlotte, NC	***	***	***	***	***
Green Wave	Brooklyn, NY	***	***	***	***	***
Greenway	Ormond Beach, FL	***	***	***	***	***
Hartmann	Gentofte,	***	***	***	***	***
Huhtamaki	De Soto, KS	***	***	***	***	***
JRD	Whitestone, NY	***	***	***	***	***

Table continued.

Table 4.1 (Continued) TMFPs: U.S. importers, their headquarters, and share of imports within each source, 2024

Share in percent

Firm	Headquarters	China	Vietnam	Subject Sources	Nonsubject Sources	All import sources
KD Distributing	Mound, MN	***	***	***	***	***
Meristem	Roswell, GA	***	***	***	***	***
Nowpak	South San Francisco, CA	***	***	***	***	***
Ocala Group	New Hyde Park, NY	***	***	***	***	***
Pactiv	Lake Forest, IL	***	***	***	***	***
Republic	Mcqueeney, TX	***	***	***	***	***
Reynolds	Lake Forest, IL	***	***	***	***	***
RJ Schinner	Menomonee Falls, WI	***	***	***	***	***
RMT Global	Southlake, TX	***	***	***	***	***
Royalty Global	Van Nuys, CA	***	***	***	***	***
Sabert	Sayreville, NJ	***	***	***	***	***
SC Tray	Chattanooga, TN	***	***	***	***	***
Source One	Miami, FL	***	***	***	***	***
Stephen Gould	Madison, NJ	***	***	***	***	***
Super Win	Flushing, NY	***	***	***	***	***
Team Three	Chesterfield, MO	***	***	***	***	***
Tzumi	New York, NY	***	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***	***
Wellcare	Randolph, NJ	***	***	***	***	***
World Centric	Rohnert Park, CA	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

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

U.S. imports

Table 4.2 and figure 4.1 presents data for U.S. imports of TMFPs from China and Vietnam and all other sources and table 4.3 presents the change in U.S. imports. Subject imports, by quantity, accounted for the large majority of total imports in every year from 2022 to 2024, accounting for over 80 percent of total imports during 2022 to 2024 in the interim periods.⁴ Among the subject sources, China accounted for the largest share of total imports, by quantity, accounting for over 78 percent of total imports, during 2022 and 2024. The share of the quantity of imports from China dropped from 79.7 percent in interim 2024 to 64.2 percent in interim 2025 as imports from Vietnam and nonsubject sources were higher in interim 2025 than in interim 2024. The quantity of subject imports fluctuated, decreasing from 2022 to 2023 and increasing from 2023 to 2024, increasing overall by 7.0 percent from 2022 to 2024. The value of subject imports decreased from 2022 to 2023 and increased from 2023 to 2024, ending 2024 24.6 percent lower than in 2022. The quantity of subject imports was lower in interim 2025 compared to interim 2024 while the value was higher. The unit value of subject imports decreased yearly, overall declining by 29.5 percent from 2022 to 2024 but was higher in interim 2025 than in interim 2024. During 2022 to 2024 and in interim 2025, imports from China had the highest unit values of any source, while Vietnam had the lowest.⁵

The quantity of imports from China fluctuated, as it decreased from 2022 to 2023⁶ and increased from 2023 to 2024, increasing slightly overall by 0.3 percent from 2022 to 2024 but was 14.3 percent lower in interim 2025 compared to interim 2024. In contrast, imports from Vietnam, by quantity, increased yearly, increasing overall by 180.8 percent from 2022 to 2024 and was 133.7 percent higher in interim 2025 than in interim 2024. By value, imports from China decreased from 2022 to 2023 and increased from 2023 to 2024, decreasing overall by

⁴ Imports from Vietnam were fairly concentrated with *** of total imports from Vietnam in 2024. Slightly less concentrated, imports from China also had *** of imports in 2024.

⁵ The higher unit value for imports from China is like due to a larger share of imports from China were *** which have a higher unit value. See Appendix E for breakouts by product type.

⁶ ***. Email from ***, September 8, 2025. Email from ***, September 8, 2025.

29.4 percent from 2022 to 2024.⁷ The value of imports from Vietnam increased in each year, increasing overall by 189.8 percent from 2022 to 2024. Imports from both China and Vietnam, by value, were both higher in interim 2024 compared to interim 2025. The unit value of imports from China decreased from 2022 to 2023, and increased slightly from 2023 to 2024, ending 2024 26.5 percent lower in 2024 than in 2022 but was higher in interim 2025 compared to interim 2024. The unit value of imports from Vietnam fluctuated from 2022 to 2024, increasing overall by 3.2 percent but was lower in interim 2025 compared to interim 2024.

The quantity of nonsubject imports increased from 2022 to 2023 and decreased from 2023 to 2024, ending 2024 5.6 percent higher than in 2022 and was 58.5 percent higher in interim 2025 compared to interim 2024. The value of nonsubject imports decreased yearly, declining overall by 16.6 percent from 2022 to 2024, but was 45.0 percent higher in interim 2025 compared to interim 2024. The unit value of nonsubject imports also decreased yearly, declining overall by 21.1 percent from 2022 to 2024, and was lower in interim 2025 than in interim 2024.

⁷ ***. Email from ***, September 4, 2025.

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

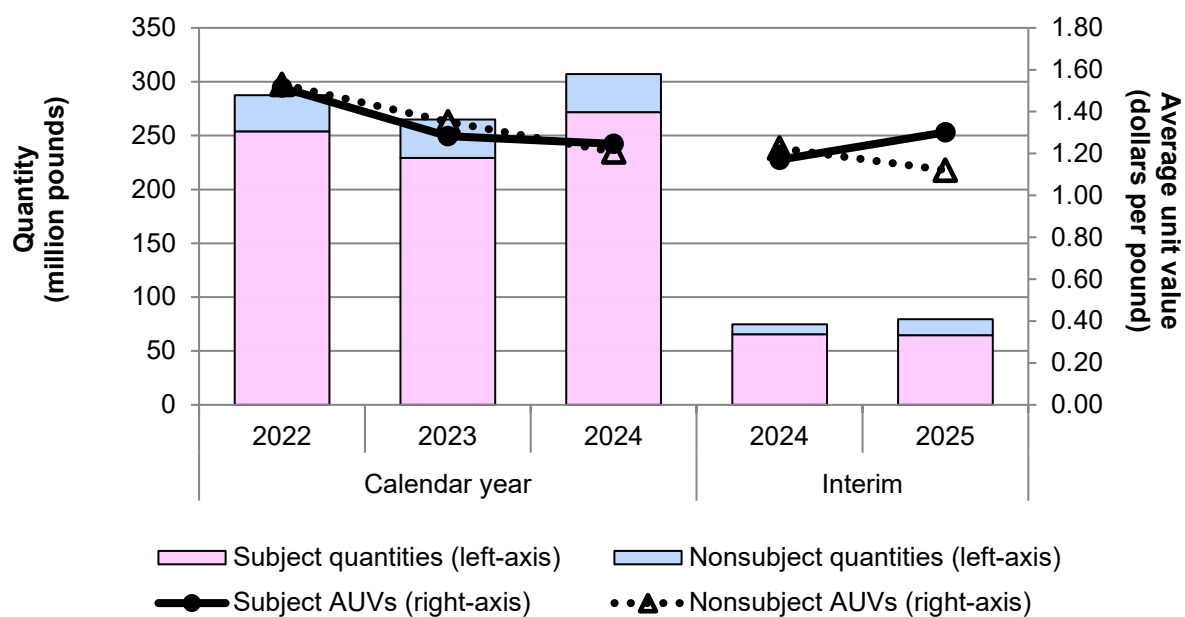
Quantity in 1,000 pounds; value in 1,000 dollars; Unit values in dollars per pound; shares and ratio in percent; interim period is January through March

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
China	Quantity	244,565	208,855	245,373	59,512	50,993
Vietnam	Quantity	9,415	20,314	26,435	5,911	13,813
Subject Sources	Quantity	253,980	229,169	271,808	65,423	64,806
Nonsubject sources	Quantity	33,409	35,781	35,284	9,222	14,618
All import sources	Quantity	287,389	264,950	307,092	74,645	79,424
China	Value	374,793	272,999	309,832	69,324	71,544
Vietnam	Value	9,938	20,949	28,802	7,260	12,838
Subject Sources	Value	384,731	293,948	338,634	76,584	84,382
Nonsubject sources	Value	51,116	48,352	42,617	11,301	16,386
All import sources	Value	435,847	342,300	381,251	87,885	100,768
China	Unit value	1.53	1.31	1.26	1.16	1.40
Vietnam	Unit value	1.06	1.03	1.09	1.23	0.93
Subject Sources	Unit value	1.51	1.28	1.25	1.17	1.30
Nonsubject sources	Unit value	1.53	1.35	1.21	1.23	1.12
All import sources	Unit value	1.52	1.29	1.24	1.18	1.27
China	Share of quantity	85.1	78.8	79.9	79.7	64.2
Vietnam	Share of quantity	3.3	7.7	8.6	7.9	17.4
Subject Sources	Share of quantity	88.4	86.5	88.5	87.6	81.6
Nonsubject sources	Share of quantity	11.6	13.5	11.5	12.4	18.4
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	86.0	79.8	81.3	78.9	71.0
Vietnam	Share of value	2.3	6.1	7.6	8.3	12.7
Subject Sources	Share of value	88.3	85.9	88.8	87.1	83.7
Nonsubject sources	Share of value	11.7	14.1	11.2	12.9	16.3
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject Sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Ratio is to U.S. production.

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



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

Table 4.3 TMFPs: Changes in U.S. imports, by source and period

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

Source	Measure	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to 2025
China	% Δ Quantity	▲ 0.3	▼ (14.6)	▲ 17.5	▼ (14.3)
Vietnam	% Δ Quantity	▲ 180.8	▲ 115.8	▲ 30.1	▲ 133.7
Subject Sources	% Δ Quantity	▲ 7.0	▼ (9.8)	▲ 18.6	▼ (0.9)
Nonsubject sources	% Δ Quantity	▲ 5.6	▲ 7.1	▼ (1.4)	▲ 58.5
All import sources	% Δ Quantity	▲ 6.9	▼ (7.8)	▲ 15.9	▲ 6.4
China	% Δ Value	▼ (17.3)	▼ (27.2)	▲ 13.5	▲ 3.2
Vietnam	% Δ Value	▲ 189.8	▲ 110.8	▲ 37.5	▲ 76.8
Subject Sources	% Δ Value	▼ (12.0)	▼ (23.6)	▲ 15.2	▲ 10.2
Nonsubject sources	% Δ Value	▼ (16.6)	▼ (5.4)	▼ (11.9)	▲ 45.0
All import sources	% Δ Value	▼ (12.5)	▼ (21.5)	▲ 11.4	▲ 14.7
China	% Δ Unit value	▼ (17.6)	▼ (14.7)	▼ (3.4)	▲ 20.4
Vietnam	% Δ Unit value	▲ 3.2	▼ (2.3)	▲ 5.7	▼ (24.3)
Subject Sources	% Δ Unit value	▼ (17.8)	▼ (15.3)	▼ (2.9)	▲ 11.2
Nonsubject sources	% Δ Unit value	▼ (21.1)	▼ (11.7)	▼ (10.6)	▼ (8.5)
All import sources	% Δ Unit value	▼ (18.1)	▼ (14.8)	▼ (3.9)	▲ 7.8
China	ppt Δ Quantity	▼ (5.2)	▼ (6.3)	▲ 1.1	▼ (15.5)
Vietnam	ppt Δ Quantity	▲ 5.3	▲ 4.4	▲ 0.9	▲ 9.5
Subject Sources	ppt Δ Quantity	▲ 0.1	▼ (1.9)	▲ 2.0	▼ (6.1)
Nonsubject sources	ppt Δ Quantity	▼ (0.1)	▲ 1.9	▼ (2.0)	▲ 6.1
All import sources	ppt Δ Quantity	—	—	—	—
China	ppt Δ Value	▼ (4.7)	▼ (6.2)	▲ 1.5	▼ (7.9)
Vietnam	ppt Δ Value	▲ 5.3	▲ 3.8	▲ 1.4	▲ 4.5
Subject Sources	ppt Δ Value	▲ 0.5	▼ (2.4)	▲ 2.9	▼ (3.4)
Nonsubject sources	ppt Δ Value	▼ (0.5)	▲ 2.4	▼ (2.9)	▲ 3.4
All import sources	ppt Δ Value	—	—	—	—
China	ppt Δ Ratio	▲ ***	▼ ***	▲ ***	▼ ***
Vietnam	ppt Δ Ratio	▲ ***	▲ ***	▲ ***	▲ ***
Subject Sources	ppt Δ Ratio	▲ ***	▼ ***	▲ ***	▼ ***
Nonsubject sources	ppt Δ Ratio	▲ ***	▲ ***	▲ ***	▲ ***
All import sources	ppt Δ Ratio	▲ ***	▼ ***	▲ ***	▲ ***

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

Note: Shares and ratios shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁸ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁹ Imports from China and Vietnam accounted for 78.3 percent and 7.9 percent, respectively, of total imports of TMFPs from October 2023 through September 2024. Table 4.4 presents data on U.S. imports in the twelve months preceding the filing of the petitions.

Table 4.4 TMFPs: U.S. imports in the twelve-month period preceding the filing of the petition, October 2023 through September 2024

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
China	217,467	78.3
Vietnam	21,958	7.9
All other sources	38,482	13.8
All import sources	277,907	100.0

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

⁸ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

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

Critical circumstances

On September 30, 2025, Commerce issued its final CVD determination that “critical circumstances” exist with regard to imports from Vietnam of TMFPs from Vietnam Yuzhan Packaging Technology Co. Ltd. (Yuzhan), as well as HC Packaging Asia (Industrial Park), Honha Eco Pulp Viet Nam Paper Tray, Pulp Tray, Martin Vietnam Co. Ltd, and all other producers and/or exporters not individually examined.¹⁰ In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to countervailing duties retroactive by 90 days from March 14, 2025, the effective date of Commerce’s preliminary affirmative CVD determination. Tables 4.5 and 4.6 and figure 4.2 present this data.

Table 4.5 TMFPs: U.S. imports from Vietnam subject to Commerce’s affirmative final critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
April 2024	Before	1,024
May 2024	Before	1,535
June 2024	Before	1,966
July 2024	Before	1,740
August 2024	Before	1,511
September 2024	Before	3,035
October 2024	After	2,819
November 2024	After	3,113
December 2024	After	4,509
January 2025	After	5,683
February 2025	After	4,072
March 2025	After	4,056

Table continued.

¹⁰ 90 FR 46805, September 30, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

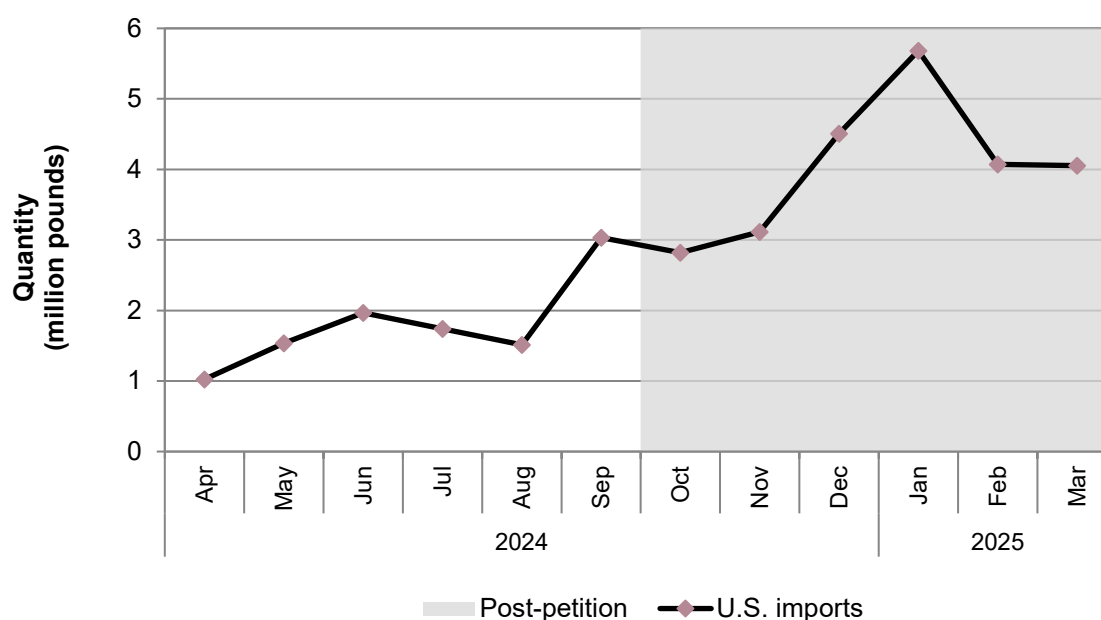
Table 4.5 (Continued) TMFPs: U.S. imports from Vietnam subject to Commerce’s affirmative final critical circumstances determination in the CVD investigation, by differing number of months before and after the filing of the petition

Quantity in 1,000 pounds

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	3,035	2,819	(7.1)
2 months	4,546	5,932	30.5
3 months	6,286	10,441	66.1
4 months	8,252	16,124	95.4
5 months	9,787	20,196	106.4
6 months	10,811	24,252	124.3

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

Figure 4.2 TMFPs: U.S. imports from Vietnam subject to final Commerce critical circumstances determination in the CVD investigation, by month



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

Note: In its final CVD determination, Commerce found critical circumstances exist for all imports from Vietnam.

Table 4.6 TMFPs: End of period inventories of imports from Vietnam subject to final Commerce critical circumstances determination in the CVD investigations, by month

Quantity in 1,000 pounds; index in percent where September 30, 2024 = 100.0 percent

Date	Inventory Quantity	Index
September 30,2024	***	100.0
October 31,2024	***	***
November 30,2024	***	***
December 31, 2024	***	***
January 31, 2025	***	***
February 28, 2025	***	***
March 31, 2025	***	***

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

Cumulation considerations

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

Fungibility

Table 4.7 and figure 4.2 present data on U.S. producers' and U.S. importers' U.S. shipments in 2024 by product type.^{11 12} TMFP imports from subject and nonsubject sources had U.S. shipments of each product type, while U.S. producers did not have any U.S. shipments of ***. The large majority (***) of U.S. producers' U.S. shipments were round or oval plate. The largest share of U.S. shipments of TMFP imports from both China and Vietnam were clamshells, accounting for *** percent and *** percent, respectively. The majority (***) of U.S. shipments of TMFPs imports from nonsubject sources were bowls. Subject sources accounted for the majority of all product types except round or oval plate, for which U.S. producers accounted for *** percent of shipments.

Table 4.7 TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

Quantity in 1,000 pounds

Source	Round or Oval plate	Square or rectangular tray	Bowls	Clamshells	Lids
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

¹¹ See Appendix E for product type and appearance breakouts.

¹² The "other product types" included ***, ***.

Table 4.7 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

Quantity in 1,000 pounds

Source	Cup carriers	Portion cups	Other	All product forms
U.S. producers	***	***	***	***
China	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table 4.7 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

Share across in percent

Source	Round or Oval plate	Square or rectangular tray	Bowls	Clamshells	Lids
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table 4.7 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

Share across in percent

Source	Cup carriers	Portion cups	Other	All product forms
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table 4.7 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

Share down in percent

Source	Round or Oval plate	Square or rectangular tray	Bowls	Clamshells	Lids
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

Table continued.

Table 4.7 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

Share down in percent

Source	Cup carriers	Portion cups	Other	All product forms
U.S. producers	***	***	***	***
China	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

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

Figure 4.3 TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product type

* * * * *

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

Table 4.8 and figure 4.3 present data on U.S. producers' and U.S. importers' U.S. shipments in 2024 of TMFPs by fiber appearance.¹³ The vast majority of U.S. shipments from U.S. producers and U.S. shipments of imports from China, Vietnam and nonsubject sources were plain TMFPs. The majority of U.S. producers' U.S. shipments were plain bleached TMFPs while the share of U.S. shipments of imports from China and Vietnam of plain unbleached TMFPs was only slightly larger than plain bleached TMFPs. The largest share of U.S. shipments of TMFPs imports from nonsubject sources were plain bleached TMFPs.

U.S. producers' and all import sources' U.S. shipments account for a nearly equal shares of plain bleached TMFPs while U.S. producers' account for the majority of U.S. shipments of other than plain TMFPs. U.S. shipments of imports from China account for the majority of plain unbleached TMFPs.

Table 4.8 TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and fiber appearance

Quantity in 1,000 pounds

Source	Plain bleached	Plain unbleached	Plain Total	Other than plain	All fiber appearances
U.S. producers	***	***	***	***	***
China	***	***	***	***	237,152
Vietnam	***	***	***	***	21,922
Subject sources	***	***	***	***	259,074
Nonsubject sources	***	***	***	***	32,828
All import sources	***	***	***	***	291,902
All sources	***	***	***	***	***

Table continued.

¹³ The "other product types" of shipments from U.S. producers included ***, from imports from China included ***, and imports from Vietnam and nonsubject sources included ***.

Table 4.8 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and fiber appearance

Share across in percent

Source	Plain bleached	Plain unbleached	Plain Total	Other than plain	All fiber appearances
U.S. producers	***	***	***	***	100.0
China	***	***	***	***	100.0
Vietnam	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table 4.8 (Continued) TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and fiber appearance

Share down in percent

Source	Plain bleached	Plain unbleached	Plain Total	Other than plain	All fiber appearances
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

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

Figure 4.4 TMFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and fiber appearance

* * * * *

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

Geographical markets

U.S. imports of molded fiber products (“MFPs”) from China and Vietnam entered the United States through ports in every region.¹⁴ Three-fourths of imports of MFPs from China entered the United States through ports located in the West and East while two thirds of imports of MFPs from Vietnam entered though ports located in the North and West. Imports of MFPs from nonsubject sources entered the United States through ports located in the East, North, West, and South at similar shares. Table 4.9 presents data on imports by border of entry.

Table 4.9 Molded fiber products: U.S. imports by source and border of entry, 2024

Value in 1,000 dollars

Source	East	North	South	West	All borders
China	159,109	68,010	36,157	187,886	451,162
Vietnam	4,119	8,795	4,439	8,984	26,336
Subject sources	163,229	76,805	40,596	196,869	477,499
Nonsubject sources	64,696	73,364	64,902	53,303	256,266
All import sources	227,925	150,169	105,499	250,173	733,765

Table continued.

Table 4.9 (Continued) Molded fiber products: U.S. imports by source and border of entry, 2024

Share in percent

Source	East	North	South	West	All borders
China	35.3	15.1	8.0	41.6	100.0
Vietnam	15.6	33.4	16.9	34.1	100.0
Subject sources	34.2	16.1	8.5	41.2	100.0
Nonsubject sources	25.2	28.6	25.3	20.8	100.0
All import sources	31.1	20.5	14.4	34.1	100.0

Table continued.

¹⁴ MFPs is a broader category that includes both TMFPs and other MFPs.

Table 4.9 (Continued) Molded fiber products: U.S. imports by source and border of entry, 2024

Share in percent

Source	East	North	South	West	All borders
China	69.8	45.3	34.3	75.1	61.5
Vietnam	1.8	5.9	4.2	3.6	3.6
Subject sources	71.6	51.1	38.5	78.7	65.1
Nonsubject sources	28.4	48.9	61.5	21.3	34.9
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040, accessed September 4th, 2025. Official imports data are based on the imports for consumption data series, and value data reflect landed, duty-paid values.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". These statistical reporting numbers include both TMFPs and other MFPs.

Presence in the market

U.S. imports of MFPs from China, Vietnam, and nonsubject sources were present in every month between January 2022 and March 2025. Table 4.10 presents data on monthly imports.

Table 4.10 Molded fiber products: U.S. imports, by source and month

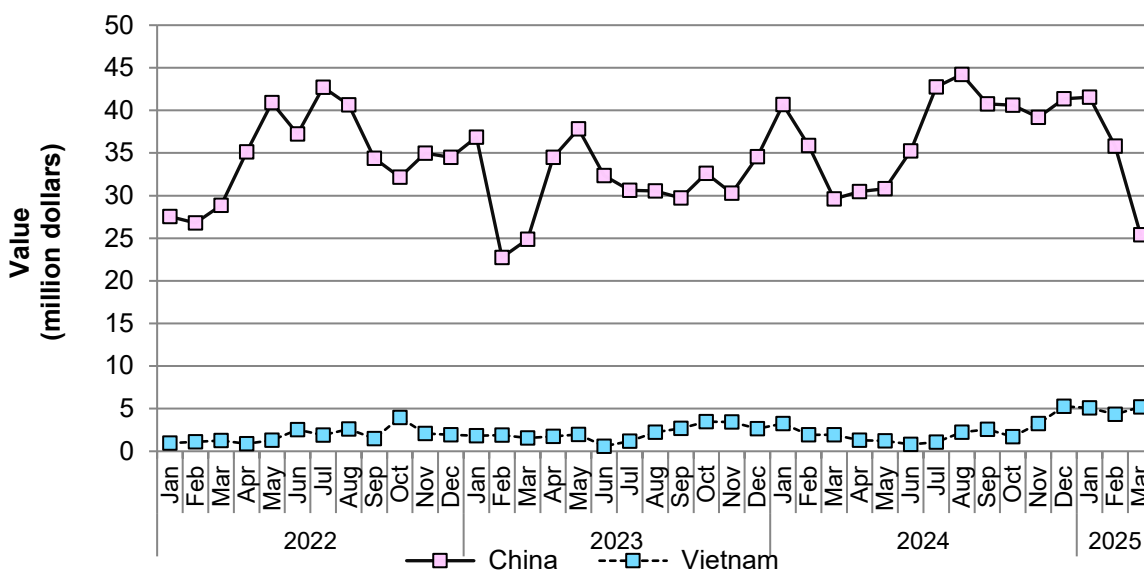
Value in 1,000 dollars

Year	Month	China	Vietnam	Subject sources	Nonsubject sources	All import sources
2022	January	27,550	958	28,508	13,997	42,505
2022	February	26,801	1,118	27,919	13,214	41,134
2022	March	28,875	1,271	30,146	17,363	47,509
2022	April	35,115	884	35,999	14,968	50,967
2022	May	40,916	1,291	42,207	15,997	58,203
2022	June	37,227	2,531	39,758	16,033	55,791
2022	July	42,716	1,889	44,605	15,060	59,665
2022	August	40,645	2,612	43,257	17,994	61,250
2022	September	34,361	1,491	35,852	17,126	52,978
2022	October	32,148	3,962	36,110	19,340	55,450
2022	November	34,979	2,072	37,051	20,054	57,105
2022	December	34,497	1,937	36,433	17,979	54,413
2023	January	36,854	1,818	38,671	19,184	57,856
2023	February	22,747	1,913	24,660	16,603	41,263
2023	March	24,907	1,571	26,478	18,087	44,565
2023	April	34,549	1,730	36,279	17,047	53,326
2023	May	37,918	1,988	39,906	16,280	56,186
2023	June	32,366	597	32,963	16,664	49,627
2023	July	30,714	1,186	31,899	16,125	48,025
2023	August	30,648	2,246	32,894	17,429	50,323
2023	September	29,777	2,699	32,476	17,527	50,003
2023	October	32,821	3,464	36,285	19,304	55,589
2023	November	30,307	3,452	33,758	18,107	51,865
2023	December	34,654	2,644	37,298	17,999	55,297
2024	January	40,439	3,241	43,680	19,645	63,325
2024	February	36,075	1,938	38,013	17,698	55,711
2024	March	29,491	1,921	31,411	20,720	52,131
2024	April	30,482	1,282	31,764	23,335	55,099
2024	May	30,828	1,232	32,060	23,341	55,401
2024	June	35,205	794	35,999	17,181	53,180
2024	July	42,690	1,058	43,748	20,912	64,660
2024	August	44,172	2,003	46,175	21,568	67,743
2024	September	40,671	2,588	43,259	20,445	63,704
2024	October	40,407	1,745	42,153	23,649	65,802
2024	November	39,338	3,270	42,608	22,921	65,529
2024	December	41,363	5,265	46,628	24,851	71,479
2025	January	41,545	5,073	46,617	23,058	69,676
2025	February	35,795	4,334	40,128	20,087	60,216
2025	March	25,389	5,190	30,578	24,716	55,294

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040, accessed June 4th, 2025. Official imports data are based on the imports for consumption data series, and value data reflect landed, duty-paid values.

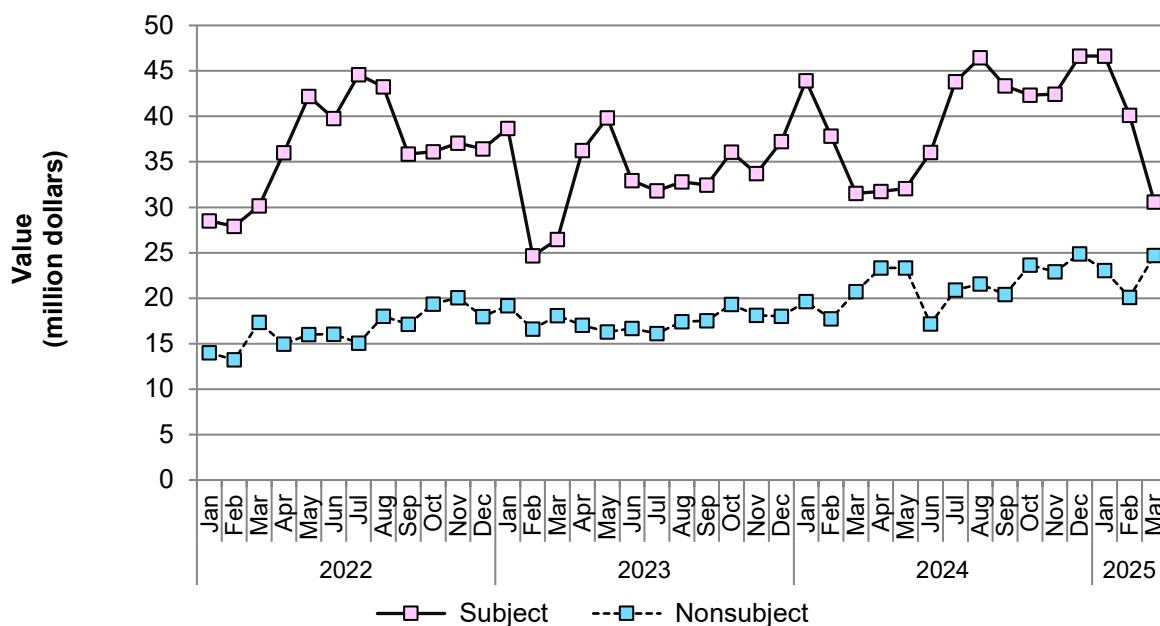
Note: These statistical reporting numbers include both TMFPs and other MFPs.

Figure 4.5 Molded fiber products: U.S. imports from individual subject sources, by month



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040, accessed June 4th, 2025. Official imports data are based on the imports for consumption data series, and value data reflect landed, duty-paid values.

Figure 4.6 Molded fiber products: U.S. imports from aggregated subject and nonsubject sources, by month



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040, accessed June 4th, 2025. Official imports data are based on the imports for consumption data series, and value data reflect landed, duty-paid values.

Apparent U.S. consumption and market shares

Quantity

Table 4.11 and figure 4.7 present data on apparent U.S. consumption and U.S. market shares by quantity for TMFPs.¹⁵ The overall market for TMFPs initially decreased slightly from 2022 to 2023, then increased from 2023 to 2024, for a net increase of *** percent from 2022 to 2024. While U.S. shipments of TMFPs from all U.S. producers declined yearly from 2022 to 2024, shipments from China, Vietnam, and nonsubject sources all increased overall from 2022 to 2024. The decrease in apparent consumption from 2022 to 2023 was due to the decline in U.S. shipments from all U.S. producers and U.S. shipments imports from China, which combined, accounted for over *** percent of total apparent consumption from 2022 to 2024, while the increase from 2023 to 2024 largely reflects the increase in U.S. shipments of imports from subject sources. Furthermore, apparent consumption was *** percent lower in interim 2025 compared to interim 2024, reflecting lower U.S. shipments of imports from China.

The decline in U.S. shipments from 2022 to 2024 resulted in a market share loss of *** percentage points for U.S. producers, and an increase of *** percentage points for subject imports. The market share of U.S. producers was *** percentage points higher while imports from subject sources were *** percent lower in interim 2025 compared to interim 2024.

The market share of imports from nonsubject sources fluctuated, increasing from 2022 to 2023 and decreasing from 2022 to 2024, ending 2024 at the same market share as in 2022. The market share of imports from nonsubject sources was *** percentage points higher in interim 2025 compared to interim 2024.

¹⁵ For the purposes of this report, Huhtamaki, Reynolds, and Pactiv are considered established producers of TMFPs. These three firms accounted for the vast majority of U.S. producers' U.S. shipments.

Table 4.11 TMFPs: Apparent U.S. consumption and market shares based on quantity, by source and period

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

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Established U.S. producers	Quantity	***	***	***	***	***
Newer U.S. producers	Quantity	***	***	***	***	***
All U.S. producers	Quantity	***	***	***	***	***
China	Quantity	215,983	205,691	237,153	55,522	39,922
Vietnam	Quantity	7,832	19,876	21,921	5,924	11,467
Subject sources	Quantity	223,815	225,567	259,074	61,446	51,389
Nonsubject sources	Quantity	32,502	37,997	32,827	9,353	12,608
All import sources	Quantity	256,317	263,564	291,901	70,799	63,997
All sources	Quantity	***	***	***	***	***
Established U.S. producers	Share	***	***	***	***	***
Newer U.S. producers	Share	***	***	***	***	***
All U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Figure 4.7 TMFPs: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Value

Table 4.12 and figure 4.8 present data on apparent U.S. consumption and U.S. market shares by value for TMFPs. The overall market for TMFPs declined in each year, decreasing overall by *** percent from 2022 to 2024. As U.S. producers' U.S. shipments and U.S. shipments of imports from Vietnam and nonsubject sources all reported an increase in the value of U.S. shipments from 2022 to 2023, the decrease from 2022 to 2023 was due to the decline in the U.S. shipments of imports from China. Meanwhile, the decrease from 2023 to 2024 reflects the decrease in the value of U.S. shipments by U.S. producers and U.S. shipments of imports from nonsubject sources as imports from subject sources increased from 2023 to 2024. The value of apparent U.S. consumption was *** percent lower in interim 2025 compared to interim 2024 reflecting the lower value of U.S. shipments of imports by China.

U.S. producers' market share, by value, increased from 2022 to 2023, and decreased from 2023 to 2024, ending 2024 *** percentage points higher in 2024 than in 2022, and was *** percentage points higher in interim 2025 than in interim 2024. The market share of U.S. shipments of imports from China, by value, fluctuated year to year, decreasing from 2022 to 2023 and increasing from 2023 to 2024, decreasing overall by *** percentage points from 2022 to 2024, and was *** percentage points lower in interim 2025 than in interim 2024. The market share of U.S. shipments of imports from Vietnam, by value, increased yearly, overall increasing by *** percentage points and was *** percentage points higher in interim 2025 compared to interim 2024. Overall, the market share of U.S. shipments of subject imports mirrored the trend of imports from China, ending *** percentage points lower in 2024 than in 2022 and was *** percentage points lower in interim 2025 compared to interim 2024. The market share of U.S. shipments of imports from nonsubject sources increased from 2022 to 2023 and decreased from 2023 to 2024, decreasing overall by *** percent from 2022 to 2024 and was *** percentage points higher in interim 2025 compared to interim 2024.

Table 4.12 TMFPs: Apparent U.S. consumption and market shares based on value, by source and period

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

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
Established U.S. producers	Value	***	***	***	***	***
Newer U.S. producers	Value	***	***	***	***	***
All U.S. producers	Value	***	***	***	***	***
China	Value	530,400	466,322	477,959	110,127	86,836
Vietnam	Value	14,580	29,467	32,786	7,956	16,659
Subject sources	Value	544,980	495,789	510,745	118,083	103,495
Nonsubject sources	Value	55,811	60,019	44,454	12,738	24,237
All import sources	Value	600,791	555,808	555,199	130,821	127,732
All sources	Value	***	***	***	***	***
Established U.S. producers	Share	***	***	***	***	***
Newer U.S. producers	Share	***	***	***	***	***
All U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

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

Figure 4.8 TMFPs: Apparent U.S. consumption based on value, by source and period

* * * * *

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

Part 5: Pricing data

Factors affecting prices

Raw material costs

The major raw material in the production of TMFPs is fibrous pulp from plant products. The weight of the fiber used to produce TMFPs varies based on the specification of the item being produced, and different producers may produce the same item with different weights.¹ Domestic producers either purchase pulp or produce their own from plant products such as grasses, wheat straw, or sugarcane (bagasse);² but TMFPs could also be made using pulp from bamboo, wood, recycled fibers, hemp, rice straw, or other byproducts or wastes.³ Different blends of plant biomass can produce different characteristics of the thermoformed molded fiber products and the type of pulp used, and whether it is purchased or grown by the TMFP producer, may be selected based on economic decisions and the desire to keep the TMFP plant capacity filled.⁴ Other ancillary raw materials used in the production of TMFPs include items like coatings or chemicals. Raw materials accounted for *** percent of the cost of goods sold in 2022 and decreased to *** percent in 2024.

Transportation costs to the U.S. market

Transportation costs for TMFPs shipped from subject countries to the United States averaged 13.5 percent for China and 10.3 percent for Vietnam during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports in two HTS statistical reporting numbers that include other out-of-scope product.⁵

U.S. inland transportation costs

Five of 7 responding U.S. producers and 34 of 40 responding importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 1 to 6 percent with purchaser *** reporting 10

¹ Respondent's postconference brief, p. 17.

² Conference transcript, pp. 23 (Serafini), 113 (Tiller), and 175 (Davidson).

³ Petition, p. 11.

⁴ Conference transcript, p. 79 (Tiller).

⁵ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting numbers 4823.70.0020 and 4823.70.0040.

percent. Most importers reported costs of 2 to 10 percent with six importers reporting costs between 11 and 20 percent.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists (table 5.1). Importer *** reported using a cost-plus pricing methodology, and importer *** reported that its pricing is set to be competitive in the market.

Table 5.1 TMFPs: Count of U.S. producers' and importers' reported price setting methods

Count in number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	5	20
Contract	4	23
Set price list	8	27
Other	0	2
Responding firms	9	41

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers reported selling slightly less than half of their TMFPs through short-term contracts and slightly less than half through long-term contracts (table 5.2). Importers sold slightly less than half of their TMFPs through long term contracts and just under one-third in spot sales.

Table 5.2 TMFPs: U.S. producers' and subject U.S. importers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

Sale type	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***
All sales types	100.0	100.0

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

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

U.S. producers reported that their contracts fixed prices or both prices and quantities. One responding U.S. producer allowed for price renegotiations in long-term and one producer for short-term contracts, one allowed for them in annual contracts. U.S. producers are split on fixing either price or both price and quantity in short-term and annual contracts, but in long-term contracts a majority of responding producers reported fixing both. One U.S. producer reported using annual contracts indexed to raw material prices, and four responding U.S. producers reported using long-term contracts, however none of the U.S. producers who reported using short-term contracts reported indexing prices to raw materials.

A slight majority of importers (6 of 13) using short, annual or long-term contracts did not allow for price renegotiation. Half of importers fixed prices for long-term contracts while the other half fixed both price and quantity. Most contracts across all durations were not indexed to raw materials, of the indexing that did occur, it appeared more often in long-term and annual contracts.

Five purchasers reported that they purchase product daily, 9 purchase weekly, and 11 purchase monthly. Twenty-four of 28 purchasers reported that their purchasing frequency had not changed since 2022. Most purchasers contact 1 to 7 suppliers before making a purchase.

Sales terms and discounts

Six of 9 responding U.S. producers and 20 of 40 responding importers typically quote prices on a delivered basis. Twenty-four of 40 importers also reported typically quoting prices on an f.o.b. basis. Seven of nine U.S. producers reported they offer discounts of some sort: one offers total volume discounts, three offer quantity discounts, two offer both types of discounts, and one offers “temporary discount funding for consumer promotions at retail customers.” Most responding importers (25 of 41) reported they have no discount policy, though 9 reported offering quantity discounts, 8 reported offering total volume discounts, and 9 reported offering other discounts.

Price leadership

Twelve purchasers reported that there were price leaders in the TMFPs market with purchasers naming a wide variety of firms. Firms being described as price leaders by multiple purchasers were World Centric, Huhtamaki, Pactiv, Genera and Eco Products.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following TMFPs products shipped to unrelated U.S. customers during January 2022 to March 2025.

Product 1.-- 8.75"-9.25" round thermoformed molded fiber plate, unlaminated and unprinted, 13.5 to 16.5 grams, of any color, without compartments, packaged in bulk cases (not packaged for retail sale).

Product 2.-- 9" x 9" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 43 to 47 grams, of any color, with or without compartments.

Product 3.-- 6" x 6" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 19 to 23 grams, of any color, with or without compartments.

Product 4.-- 8" to 8.75" x 5.6" to 6.5" rectangular thermoformed molded fiber tray, unlaminated and unprinted, 20 to 26 grams, of any color, with or without compartments.

Product 5.-- 8" to 8.75" x 10" to 10.75" thermoformed rectangular molded fiber tray with five compartments, unlaminated and unprinted, 20 to 26 grams, of any color.

Seven U.S. producers⁶ and 30 importers provided usable pricing data of the requested products, although not all firms reported pricing for all products for all quarters.⁷ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. commercial shipments of TMFPs, *** percent of U.S. commercial shipments of subject imports from China, and *** percent of U.S. commercial shipments of subject imports from

⁶ U.S. producers ***.

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

Vietnam in 2024.⁸ Pricing data reported accounted for a total of *** percent all subject imports. Price data for products 1 to 5 are presented in tables 5.3 to 5.7 and figures 5.1 to 5.5.⁹

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

⁹ ***.

Table 5.3 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

Table continued.

Table 5.3 (Continued) TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

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

Note: Product 1: 8.75" to 9.25" round thermoformed molded fiber plate, unlaminated and unprinted, 13.5 to 16.5 grams, of any color, without compartments, packaged in bulk cases (not packaged for retail sale).

Figure 5.1 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by source and quarter

Price of product 1

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: 8.75" to 9.25" round thermoformed molded fiber plate, unlaminated and unprinted, 13.5 to 16.5 grams, of any color, without compartments, packaged in bulk cases (not packaged for retail sale).

Table 5.4 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

Table continued.

Table 5.4 (Continued) TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

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

Note: Product 2: 9" x 9" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 43 to 47 grams, of any color, with or without compartments.

Figure 5.2 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

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

Note: Product 2: 9" x 9" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 43 to 47 grams, of any color, with or without compartments.

Table 5.5 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

Table continued.

Table 5.5 (Continued) TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

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

Note: Product 3: 6" x 6" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 19 to 23 grams, of any color, with or without compartments.

Figure 5.3 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by source and quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

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

Note: Product 3: 6" x 6" thermoformed molded fiber "clamshell" container, unlaminated and unprinted, with an attached hinged lid, 19 to 23 grams, of any color, with or without compartments

Table 5.6 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

Table continued.

Table 5.6 (Continued) TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

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

Note: Product 4: 8" to 8.75" x 5.6" to 6.5" rectangular thermoformed molded fiber tray, unlaminated and unprinted, 20 to 26 grams, of any color, with or without compartments.

Figure 5.4 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by source and quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

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

Note: Product 4: 8" to 8.75" x 5.6" to 6.5" rectangular thermoformed molded fiber tray, unlaminated and unprinted, 20 to 26 grams, of any color, with or without compartments.

Table 5.7 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

Table continued.

Table 5.7 (Continued) TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter

Quantity in 1,000 pieces; Prices in dollars per 1,000 pieces; Margins in percent.

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

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

Note: Product 5: 8" to 8.75" x 10" to 10.75" thermoformed rectangular molded fiber tray with five compartments, unlaminated and unprinted, 20 to 26 grams, of any color.

Figure 5.5 TMFPs: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter

Price of product 5

* * * * *

Volume of product 5

* * * * *

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

Note: Product 5: 8" to 8.75" x 10" to 10.75" thermoformed rectangular molded fiber tray with five compartments, unlaminated and unprinted, 20 to 26 grams, of any color.

Price trends

In general, prices decreased during January 2022 to March 2025. Table 5.8 summarizes the price trends, by country and by product. As shown in the table, domestic price decreases for four of five domestic price products ranged from *** to *** percent during January 2022 to March 2025 with product 1 experiencing an increase of *** percent. Prices for TMFPs imported from China decreased for all five products, with decreases ranging from *** to *** percent. Prices for product from Vietnam decreased for three of the five products with decreases larger than those for product imported from China, and ranging from *** to *** percent (imports from Vietnam for product 2 saw a *** percent increase). TMFPs imported from Vietnam had much lower volumes than TMFPs produced domestically or imported from China.

Table 5.8 TMFPs: Summary of price data, by product and source, January 2022 through March 2025

Prices in dollars per 1,000 pieces; Quantity in 1,000 pieces; Change in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	13	***	***	***	***	***	***
Product 1	China	13	***	***	***	***	***	***
Product 1	Vietnam	13	***	***	***	***	***	***
Product 2	United States	13	***	***	***	***	***	***
Product 2	China	13	***	***	***	***	***	***
Product 2	Vietnam	13	***	***	***	***	***	***
Product 3	United States	13	***	***	***	***	***	***
Product 3	China	13	***	***	***	***	***	***
Product 3	Vietnam	13	***	***	***	***	***	***
Product 4	United States	—	***	***	***	***	***	***
Product 4	China	13	***	***	***	***	***	***
Product 4	Vietnam	12	***	***	***	***	***	***
Product 5	United States	13	***	***	***	***	***	***
Product 5	China	13	***	***	***	***	***	***
Product 5	Vietnam	13	***	***	***	***	***	***

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

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

Table 5.9 TMFPs: Indexed U.S. producer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

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

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

Figure 5.6 TMFPs: Indexed U.S. producer prices, by quarter

* * * * *

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

Table 5.10 TMFPs: Indexed U.S. importer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

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

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

Figure 5.7 TMFPs: Indexed U.S. importer prices, by quarter

* * * * *

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

Price comparisons

As shown in tables 5.12 to 5.14, prices for product imported from China were below those for U.S.-produced product in 27 of 52 instances (**); margins of underselling ranged from ** to ** percent. In the remaining 25 instances (**), prices for product from China were between ** and ** percent above prices for the domestic product. Prices for product imported from Vietnam were below those for U.S.-produced product in 45 of 52 instances (**); margins of underselling ranged from ** to ** percent. In the remaining 7 instances (**), prices for product from Vietnam were between ** and ** percent above prices for the domestic product.

U.S. producer Genera provided context for product one, round molded fiber plates, which saw a majority of overselling, stating that plates are often a product that needs to be offered in order to get a contract with a buyer and have the ability to sell other TMFP products, thus the product is negotiated very aggressively to be able to get access. Genera stated that plates are “probably one of the more aggressively negotiated products because there's a big volume attached to it... one wants to sell lots of plates. There are people who want to buy lots of plates, but it's not an item that you want to base your whole business on... That baseline product needs to be there... So, you need {plates} as part of your base... it carries volume, it leverages costs, so it's important to the business.”¹⁰

¹⁰ Hearing transcript, pp. 46 to 47 (Mascarello).

Table 5.11 TMFPs: Instances and quantities of underselling/overselling and the range and average of margins, by product

Quantity in 1,000 pieces; margins in percent

Products	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	7	***	***	***	***
Product 2	Underselling	19	***	***	***	***
Product 3	Underselling	23	***	***	***	***
Product 4	Underselling	—	***	***	***	***
Product 5	Underselling	23	***	***	***	***
All products	Underselling	72	***	***	***	***
Product 1	Overselling	19	***	***	***	***
Product 2	Overselling	7	***	***	***	***
Product 3	Overselling	3	***	***	***	***
Product 4	Overselling	—	***	***	***	***
Product 5	Overselling	3	***	***	***	***
All products	Overselling	32	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Table 5.12 TMFPs: Instances and quantities of underselling/overselling and the range and average of margins, by source

Quantity in 1,000 pieces; Margins in percent

Sources	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
China	Underselling	27	***	***	***	***
Vietnam	Underselling	45	***	***	***	***
All subject sources	Underselling	72	***	***	***	***
China	Overselling	25	***	***	***	***
Vietnam	Overselling	7	***	***	***	***
All subject sources	Overselling	32	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Table 5.13 TMFPs: Instances and quantities of underselling/overselling and the range and average of margins, by period

Quantity in 1,000 pieces; Margins in percent

Period	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2022	Underselling	17	***	***	***	***
2023	Underselling	23	***	***	***	***
2024	Underselling	26	***	***	***	***
January through March 2025	Underselling	6	***	***	***	***
All periods	Underselling	72	***	***	***	***
2022	Overselling	15	***	***	***	***
2023	Overselling	9	***	***	***	***
2024	Overselling	6	***	***	***	***
January through March 2025	Overselling	2	***	***	***	***
All periods	Overselling	32	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Lost sales and lost revenue

The Commission requested that U.S. producers of TMFPs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of TMFPs from subject countries during January 2021 to June 2024. Three of six responding U.S. producers reported that they had to reduce prices and one of six reported it had to roll back announced price increases due to subject imports. Four of six responding firms reported that they had lost sales to subject imports. Three U.S. producers submitted lost sales and lost revenue allegations. The three responding U.S. producers identified 25 firms with which they lost sales or revenue (2 consisting of a lost sales allegation, 6 consisting of lost revenue allegations, and 20 consisting of both types of allegations). Most allegations specified that the sales or revenues were lost with respect to China, but three specified China and Vietnam.

In the final phase of these investigations, of the five responding U.S. producers, three reported that they had to reduce prices, two reported that they had to roll back announced price increases, and three firms reported that they had lost sales.

Staff contacted 130 purchasers and received responses from 28 purchasers. Responding purchasers reported purchasing 1.5 billion pounds of TMFPs during January 2022 to March 2025 (table 5.14).

With regards to China, of the 27 responding purchasers, 21 reported that, since 2022, they had purchased imported TMFPs from China instead of U.S.-produced product. Fifteen of these purchasers reported that Chinese import prices were lower than U.S.-produced product, and 7 of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product (table 5.16). Six purchasers estimated the quantity of TMFPs from China purchased instead of domestic product; quantities ranged from *** pounds to *** pounds (table 5.15).

With regard to Vietnam, of the 26 responding purchasers, 7 reported that, since 2022, they had purchased imported TMFPs from Vietnam instead of U.S.-produced product. Six of these purchasers reported that Vietnamese import prices were lower than U.S.-produced product, and 3 of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product (table 5.16). Three purchasers estimated the quantity of TMFPs from Vietnam purchased instead of domestic product; quantities ranged from *** pounds to *** pounds (table 5.15).

Purchasers identified several non-price reasons for purchasing imported rather than U.S.-produced product. Two purchasers reported that U.S. manufacturers do not offer white molded fiber products and only offer natural (unbleached) items. In addition, several

purchasers mentioned that U.S. product lines are limited in size and variety compared to overseas suppliers; issues mentioned included limited ability for lamination, limited custom molding and tooling availability, limited custom printing capabilities, limited raw material options, and quality issues.

Of the 10 responding purchasers, 2 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from China and none of the responding purchasers indicated that domestic prices decreased to compete with imports from Vietnam; 18 reported that they did not know (table 5.18). The reported estimated price reduction ranged from *** percent (table 5.17).

Quantity in 1,000 pounds; Change in shares in percentage points

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

5.25

Quantity in 1,000 pounds

Table continued.

Table 5.15 (Continued)TMFPs: U.S. purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 21; No: 6	Yes: 15; No: 6	Yes: 7; No: 14	***	

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

Table 5.16 TMFPs: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Count in number of firms reporting; quantity in 1,000 pounds

Source	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity
China	21	15	7	***
Vietnam	7	6	3	***
Subject sources	21	15	7	***

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

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

Price reductions in percent

Source	Producers lowered prices	Average price reduction	Range of price reductions
China	2	***	***
Vietnam	0	***	***
Subject sources	2	***	***

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

Count in number of firms reporting; price reductions in percent

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

Part 6: Financial experience of U.S. producers

Background¹

Nine U.S. producers (Dart, Genera, Huhtamaki, Kanbol, Pactiv, Reynolds, Sabert, Tekni-Plex, and Tellus) provided usable financial results on their TMFP operations in the United States.² The three established U.S. producers Huhtamaki and Reynolds were publicly traded companies during the period examined.³ ⁴ The remaining six U.S. producers that provided usable financial results are privately held and newer to TMFP production.⁵ The financial results

¹ The following abbreviations are used in the tables and/or text in this part of the report: generally accepted accounting principles (“GAAP”), international financial reporting standards (“IFRS”), fiscal year (“FY”), January 2022 to March 2025 (“period examined”), January to March 2024 (“interim 2024”), January to March 2025 (“interim 2025”), net sales (“NS”), cost of goods sold (“COGS”), selling, general, and administrative expenses (“SG&A expenses”), average unit values (“AUVs”), research and development expenses (“R&D expenses”), and return on assets (“ROA”).

² Four U.S. producers *** submitted responses on their non-TMFP (other molded fiber products) that are not included in this part of the staff report. See appendix F for more details on these producers’ out-of-scope non-TMFP operations.

A fifth U.S. producer *** stated that approximately *** percent of sales in the same facilities that produces TMFP were accounted for by non-TMFP products in 2024, ***. *** U.S. producer questionnaire, 3.5 and 6.12.

³ The “established” and “larger” U.S. producer group (Huhtamaki, Pactiv, and Reynolds) in this report references the three longer-term manufacturers that account for the vast majority of sales during the period examined. All three established U.S. producers also provided U.S. importer questionnaire responses. See part 4 for information on their imports.

⁴ Huhtamaki and Reynolds are currently publicly traded. Huhtamaki’s (HEL: HUH1V) TMFP operations are included in its Fiber Foodservice E-A-O business segment. Huhtamaki 2024 Annual Report, p. 10. Reynolds’ (NASDAQ: REYN) TMFP operations is organized within its Hefty Tableware business segment. Reynolds 2024 10-K, p. 6 (as filed).

Pactiv LLC (NASDAQ: PTVE) was acquired by Novolex Holdings, LLC on April 1, 2025 for \$6.7 billion and became part of privately held Novolex’s holdings. Novolex webpage, <https://novolex.com/blog/novolex-and-pactiv-evergreen-inc-complete-combination-creating-a-leading-manufacturer-in-food-beverage-and-specialty-packaging/>, retrieved September 5, 2025.

⁵ These six smaller U.S. producers (***) are referenced as “startup” or “newer” or “smaller” U.S. producers in this report, either starting TMFP operations during the POI (or a couple of years prior) and/or ramped up capacity during the period examined.

Three new U.S. producers (***) started TMFP operations during the period examined. ***, ***, ***. Email from ***, October 31, 2024 and *** U.S. producer questionnaire, 2.2. *** U.S. producer questionnaire, 2.2. Email with attachment from ***, October 28, 2024.

*** started TMFP operations in 2021 and expanded capacity during the period examined. *** began TMFP operations at its ***. *** U.S. producer questionnaire, 2.2.

*** installed three new molding machines in 2023 and added three more molding machines in 2024, more than doubling its net assets from 2022 to 2024. *** U.S. producer questionnaire, 3.12a and 3.12b. (continued...)

reported to the Commission are based on information from accounting systems designed to report overall financial results on the basis of IFRS and U.S. GAAP.⁶

Among the three established and largest U.S. producers, *** is the largest when measuring production and net sales, with the aggregated financial data largely reflecting its operations from 2022 to March 2025.⁷ ⁸ The U.S. industry's TMFP net sales primarily reflect U.S. commercial sales, ranging from *** to *** percent of total net sales during the period examined. Given the predominance of U.S. commercial sales, a single line item for sales is presented in the relevant tables in this section of the report.⁹

Tellus began construction of its Belle Glade, Florida facility in 2018 and began operations with equipment purchased from a third party. During the period examined, Tellus subsequently developed and installed its own molding machines. Conference transcript, pp. 69-70. ***. Email with attachment from ***, November 5, 2024.

⁶ *** U.S. producer to report its financial results on the basis of IFRS; the remaining eight U.S. producers reported their financial results on the basis of U.S. GAAP. U.S. producer questionnaires, 3.2.B.4. Eight U.S. producers reported their annual financial results on a calendar year basis while *** reported its financial results using fiscal year basis ending on June 30th.

⁷ Staff conducted a verification of Huhtamaki's U.S. producer questionnaire data and incorporated revisions resulting from verification within the report. Staff verification report, Huhtamaki, November 2025.

⁸ The AUVs of sales and cost items largely reflect the operations of the three largest and established U.S. producers, with the six startup and/or smaller U.S. producers' AUVs fluctuating broadly as they entered and/or expanded capacity in the TMFPs industry.

⁹ No internal consumption was reported by any responding U.S. producer. ***. Staff verification report, Huhtamaki, November 2025.

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

* * * * *

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

Note: *** represent less one percent of net sales quantity in 2024 and are not shown in figure 6.1.

Operations on TMFPs

Table 6.1 presents aggregated data on U.S. producers’ operations in relation to TMFPs, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected net sales and operating results while table 6.4 presents selected company-specific financial data. The Commission’s general practice, as reflected in the staff report, is to exclude reported costs and expenses of new U.S. producers in periods when no corresponding sales were reported.¹⁰

¹⁰ ***. For financial reporting purposes there are valid instances (e.g., during start-up operations) when no sales are reported and only costs/expenses incurred. The Commission, however, generally limits the financial results evaluated to periods when at least some level of sales has been generated that can be matched against relevant costs/expenses. This approach attempts to maximize instances when the matching principle is reflected in the financial results evaluated by the Commission and minimize instances when it is not. The matching principle is an accounting principle that requires businesses to record expenses in the same period as the revenues they generate. It is a key part of GAAP and accrual basis accounting.

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

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

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
Raw materials: Biomass costs	Value	***	***	***	***	***
Raw materials: Purchased pulp costs	Value	***	***	***	***	***
Raw materials: Other material input costs	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
Raw materials: Biomass costs	Ratio to NS	***	***	***	***	***
Raw materials: Purchased pulp costs	Ratio to NS	***	***	***	***	***
Raw materials: Other material input costs	Ratio to NS	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

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

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

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Raw materials: Biomass costs	Share	***	***	***	***	***
Raw materials: Purchased pulp costs	Share	***	***	***	***	***
Raw materials: Other material input costs	Share	***	***	***	***	***
COGS: Raw material costs	Share	***	***	***	***	***
COGS: Direct labor costs	Share	***	***	***	***	***
COGS: Other factory costs	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	***	***	***	***	***
Raw materials: Biomass costs	Unit value	***	***	***	***	***
Raw materials: Purchased pulp costs	Unit value	***	***	***	***	***
Raw materials: Other material input costs	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	4	5	7	6	7
Net losses	Count	4	5	7	6	7
Data	Count	7	8	9	8	9

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

Note: Shares represent the share of COGS. Shares and ratios shown as "0.00" represent values greater than zero, but less than "0.005" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 6.2 TMFPs: Changes in AUVs between comparison periods

Changes in percent; interim is January through March

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲ ***	▲ ***	▲ ***	▼ ***
Raw materials: Biomass costs	▲ ***	▲ ***	▲ ***	▲ ***
Raw materials: Purchased pulp costs	▲ ***	▲ ***	▲ ***	▲ ***
Raw materials: Other material input costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Raw material costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Direct labor costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▲ ***

Table continued.

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

Changes in dollars per pound; interim is January through March

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▲ ***	▲ ***	▲ ***	▼ ***
Raw materials: Biomass costs	▲ ***	▲ ***	▲ ***	▲ ***
Raw materials: Purchased pulp costs	▲ ***	▲ ***	▲ ***	▲ ***
Raw materials: Other material input costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Raw material costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Direct labor costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▲ ***
Gross profit or (loss)	▼ ***	▼ ***	▼ ***	▼ ***
SG&A expense	▲ ***	▲ ***	▲ ***	▲ ***
Operating income or (loss)	▼ ***	▼ ***	▼ ***	▼ ***
Net income or (loss)	▼ ***	▼ ***	▼ ***	▼ ***

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

Note: Percentages and unit values shown as “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table 6.3 TMFPs: U.S. producers' sales, costs/expenses, and profitability: net sales value and operating income or (loss) summary, by U.S. producer group and period

Value in 1,000 dollars; ratio in percent; interim period is January through March

Measure	Group	2022	2023	2024	Interim 2024	Interim 2025
Net sales value	Established	***	***	***	***	***
Operating income or (loss) value	Established	***	***	***	***	***
Operating income or (loss) value to net sales ratio	Established	***	***	***	***	***
Net sales value	Newer	***	***	***	***	***
Operating income or (loss) value	Newer	***	***	***	***	***
Operating income or (loss) value to net sales ratio	Newer	***	***	***	***	***
Net sales value	All U.S. producers	***	***	***	***	***
Operating income or (loss) value	All U.S. producers	***	***	***	***	***
Operating income or (loss) value to net sales ratio	All U.S. producers	***	***	***	***	***

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

Table 6.4 TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; interim is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table 6.4 (Continued) TMFPs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

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

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

Net sales

As presented in table 6.1, aggregated net sales quantity consistently decreased while net sales value irregularly decreased from 2022 to 2024; both net sales quantity and value were higher in interim 2025 than in interim 2024. As shown in tables 6.3 and 6.4 the company-specific pattern of net sales quantity and value reflect the aggregated results for established U.S. producers but were directionally mixed for the newer U.S. producers (the two newest U.S. producers (***) reported minimal net sales volume).

Table 6.4 shows that company-specific average per-pound net sales values were in a broadly similar range; differences presumably reflecting factors such as product mix and the wide range of TMFP shapes (standard and customized).¹¹ U.S. producers *** reported increasing while *** reported declining average per-pound net sales value from 2022 to 2024 but were more directionally mixed between the interim periods.^{12 13}

Cost of goods sold and gross profit or loss¹⁴

As presented in table 6.1, raw material costs represented the second largest component of COGS from 2022 to interim 2025, ranging from *** to *** percent of total COGS.¹⁵ The industry's total raw material costs irregularly increased from 2022 to 2024 (as sales volumes irregularly declined) and were lower in interim 2025 compared to interim 2024 (sales volumes were also higher). Raw material costs per unit increased from 2022 to 2024 and were higher in

¹¹ Conference transcript, pp. 46 to 47 (Tiller, Mokaddem) and pp. 49 to 50 (Mascarello).

¹² Without specifying the impact on average per-pound sales value, Genera indicated that its TMFP product mix changed over the period as its capabilities increased in conjunction with machinery additions. Conference transcript, p. 66 (Tiller).

¹³ Tellus indicated that, while the product mix of underlying shapes/products varied during the period, these changes did not substantially impact average per-pound sales value. Conference transcript, p. 67 (Dermont).

¹⁴ Four U.S. producers (***) are integrated in terms of pulp production (***). The remaining five U.S. producers (***) are non-integrated because they do not have pulp production. The U.S. industry's cost structure primarily reflects non-integrated production of the established and largest producers (***) given that group's large share of total net sales. Regardless of integrated versus non-integrated status, TMFP production itself is generally understood to be similar for all U.S. producers.

¹⁵ *** U.S. producer reporting purchased inputs from related suppliers. ***. *** U.S. producer questionnaire, 3.6 and 3.7a.

interim 2025 than in interim 2024. Since the cost structure of the U.S. industry is dominated by non-integrated producer Huhtamaki (and to a lesser extent Pactiv and Reynolds) that made up the large majority of total net sales, the U.S. industry's share of raw material costs to COGS largely reflects purchased pulp of these three U.S. producers. For the integrated producers raw material costs reflect underlying pulp feedstocks, other raw materials, and associated costs.^{16 17}

18 19 20

Table 6.4 shows that there was a relatively wide range of average per-pound raw material costs.²¹ While company-specific costs structures (i.e., integrated versus non-integrated) and product mix explain at least some of these differences, underlying capacity utilization levels are also a factor.²² For example new entrant ***, which reported a notable decline in its average per-pound raw material cost, as well as average per-pound direct labor and other factory costs, generally attributed this pattern to ***.²³ Conversely, *** reported a relatively large increase

¹⁶ Integrated producers' other raw material costs were identified as follows: ***. U.S. producer questionnaires, 3.9a.

¹⁷ Integrated producer Tellus used sugar cane bagasse as its some of its pulp feedstock, obtained from the Florida Crystals and the Sugar Cane Growers Cooperative (see also footnote 17). Conference transcript, p. 23 (Serafini). ***. *** U.S. producer questionnaire, 3.9a.

¹⁸ In the case of Genera, its primary pulp feedstock is perennial grass. Conference transcript, p. 113 (Tiller).

¹⁹ ***, reporting limited TMFP sales in 2023 with sales increasing in 2024, reported that its pulp feedstock is ***. *** U.S. producer questionnaire, 3.9a (note 2).

²⁰ ***. *** U.S. producer questionnaire, 3.9a (note 2).

²¹ As noted by a Genera company official, there are differences in pulp quality/cost depending on manufacturing process and end product. Conference transcript, p. 11 (Tiller).

²² At the Commission's staff conference and with regard to capacity associated with both pulp manufacturing and thermoforming, a Tellus company official stated ". . . it's a very fair assessment to say that it's very hard to run a pulp mill under its capacity utilization efficiently, in a cost efficient way. So, you will see the unit economics of the pulp that that pulp mill is producing improve as its capacity utilization increases." Conference transcript, p. 79 (Dermont).

²³ ***. Email from ***, October 31, 2024.

in its average per-pound raw material cost in 2023, caused by declines in its capacity utilization (reflecting lower production and an increased capacity base) as well as *** classified as raw material costs.²⁴

Table 6.1 shows that direct labor cost and other factory costs are the smallest and the largest components of COGS over the period examined, respectively: direct labor cost ranging from *** to *** percent of total COGS; other factory costs ranging from *** to *** percent of total COGS over the period examined. The relatively high level of other factory costs as a share of COGS (on an overall and company-specific basis) is generally consistent with the capital-intensive nature of the TMFP manufacturing process.²⁵

Similar to average per-pound raw material cost, company-specific average per-pound direct labor and other factory costs cover a relatively wide range (see table 6.4). The three largest and established manufacturers (***) generally had lower average per-pound direct labor and other factory costs, which appear to reflect factors such as higher levels of capacity utilization, purchasing pulp instead of making their own, and the absence of start-up costs/expenses and related activity. ***, whose average per-pound direct labor costs and other factory costs were both elevated compared to the longer-term manufacturers, indicated that sales volume was an important factor explaining its average per-pound costs, as opposed to start-up activity alone.²⁶ Similarly, *** indicated that the level of

²⁴ *** U.S. producer questionnaire, 3.10a and 3.10b. *** . Email with attachment from ***, November 1, 2024.

²⁵ Genera and Tellus company officials confirmed that they consider the overall manufacturing process to be capital intensive. Conference transcript, p. 78 (Tiller, Vermont).

²⁶ As shown in table 6.3, *** calculated average per pound COGS ranged from *** to *** per-pound over the period examined. *** . Email with attachment from ***, November 1, 2024. In response to a staff follow-up question regarding what its average per pound COGS would be at the expected/higher level of capacity utilization, *** reported that its projected COGS at full capacity would be *** per-pound. Petitioner's postconference brief (Response to staff questions, exh. 1, p. 58).

sales volume and corresponding capacity utilization was a factor impacting its average per-pound costs.²⁷

The U.S. industry's total COGS value, as a ratio to net sales, and per unit all increased consistently from 2022 to 2024 and were higher in interim 2025 than in interim 2024. The overall increase in total COGS despite a decline in sales volume in the full year periods primarily reflects increases in all three COGS categories, but especially the sharp increases in other factory costs per unit. Higher COGS between the interim periods mostly reflect increases in sales volume and continued increases in other factory costs as a ratio to net sales and per unit other factory costs.

Table 6.1 shows that total COGS increased consistently while net sales quantity declined consistently and value declined overall from 2022 to 2024, resulting in consistent declines in gross profit from 2022 to 2024. Gross profit was lower in interim 2025 than in interim 2024. On a company-specific basis U.S. producers reported a mixed directional pattern in terms of their gross results. All three established manufacturers reported gross profit declines from 2022 to 2024: *** reported irregular declines and *** reported consistent declines in gross profit from 2022 to 2024. *** interim 2025 gross profits were lower than in interim 2024 while *** were higher. The remaining six small U.S. producers (***) reported gross losses in every period when they also reported sales, with all six showing gross losses increasing from 2022 to 2024, but gross loss trend varied between the two interim periods.

²⁷ In response to a staff follow-up question regarding what its average per pound COGS would be at the expected/higher level of capacity utilization, *** reported that its projected COGS at full capacity would be *** per pound. Petitioner's postconference brief (Response to staff questions, exh. 1, p. 58).

SG&A expenses and operating income or loss

As presented in table 6.1, U.S. producers' total SG&A expenses, SG&A expense ratio (i.e., total SG&A expenses divided by net sales), and per unit SG&A expenses all consistently increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024. The increase in the U.S. industry's total SG&A expenses during the full-year period reflects a combination of increases in SG&A expenses reported by the largest U.S. producer *** and the SG&A expenses of new entrants. The company-specific SG&A expense ratios (total SG&A expenses divided by total net sales value) of the three largest U.S. producers *** in terms of net sales value were in a relatively stable range and lower than the industry average throughout the period. In contrast, the SG&A expense ratios of new or relatively new entrants *** and small producer *** were notably high and fluctuated widely.

In conjunction with the consistent decline in the U.S. industry's total gross profit, corresponding operating income also declined consistently, with increasing SG&A expenses during the full-year periods magnifying the impact of declining gross profit. On a company-specific basis and similar to the financial results at the gross level, two established U.S. producers *** reported positive but irregularly declining operating results throughout the period examined. *** shifted from positive but declining operating income in 2022 and 2023 to a loss in 2024 and in interim 2025. All six newer U.S. producers reported gross *** that extended to larger operating losses throughout the period examined. Operating profits between the interim periods varied among U.S. producers, with *** reporting lower operating profits in interim 2025 than in interim 2024 while *** reported the opposite trend.²⁸

²⁸ *** did not report any sales in interim 2024.

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. In table 6.1, these items are aggregated, and only the net amount is shown. Net other expenses and income irregularly increased from 2022 to 2024 and were higher in interim 2025 than in interim in 2024, mostly from increases in interest and all other expenses.²⁹

Table 6.1 shows that the U.S. industry's operating income and net income shared the same directional pattern of consistent decline throughout the period examined. As compared to operating income, the lower amount of net income reflects interest expense and other expenses, both varying in terms of their relative importance during the period, which were partially offset by other income. U.S. producers were mixed in terms of whether any items (interest expense, other expenses, other income) were reported.³⁰

²⁹ The large fluctuation in all other expenses/(income), net over the period examined is largely accounted for by ***. *** U.S. producer questionnaire, 3.10a and 3.10b.

³⁰ A variance analysis is not shown due to *** among the reporting firms.

Capital expenditures and R&D expenses

Table 6.5 presents capital expenditures, by firm, and table 6.7 presents R&D expenses, by firm. Tables 6.6 and 6.8 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table 6.5 TMFPs: U.S. producers' capital expenditures, by firm and period

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

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

Table 6.6 TMFPs: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Dart	***
Genera	***
Huhtamaki	***
Kanbol	***
Pactiv	***
Reynolds	***
Sabert	***
Tekni-Plex	***
Tellus	***

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

Table 6.7 TMFPs: U.S. producers' R&D expenses, by firm and period

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

Firm	2022	2023	2024	Interim 2024	Interim 2025
Huhtamaki	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Established producers	***	***	***	***	***
Dart	***	***	***	***	***
Genera	***	***	***	***	***
Kanbol	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
Newer producers	***	***	***	***	***
All firms	***	***	***	***	***

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

Table 6.8 TMFPs: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Dart	***
Genera	***
Huhtamaki	***
Kanbol	***
Pactiv	***
Reynolds	***
Tekni-Plex	***
Tellus	***

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

Assets and return on assets

Table 6.9 presents data on the U.S. producers' total assets while table 6.10 presents their operating ROA.³¹ Table 6.11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table 6.9 TMFPs: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
Huhtamaki	***	***	***
Pactiv	***	***	***
Reynolds	***	***	***
Established producers	***	***	***
Dart	***	***	***
Genera	***	***	***
Kanbol	***	***	***
Sabert	***	***	***
Tekni-Plex	***	***	***
Tellus	***	***	***
Newer producers	***	***	***
All firms	***	***	***

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

³¹ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table 6.10 TMFPs: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2022	2023	2024
Huhtamaki	***	***	***
Pactiv	***	***	***
Reynolds	***	***	***
Established producers	***	***	***
Dart	***	***	***
Genera	***	***	***
Kanbol	***	***	***
Sabert	***	***	***
Tekni-Plex	***	***	***
Tellus	***	***	***
Newer producers	***	***	***
All firms	***	***	***

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

Table 6.11 TMFPs: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Dart	***
Genera	***
Huhtamaki	***
Kanbol	***
Pactiv	***
Reynolds	***
Sabert	***
Tekni-Plex	***
Tellus	***

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

Capital and investment

The Commission requested U.S. producers of TMFPs to describe any actual or potential negative effects of imports of TMFPs from China and/or Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.12 presents the number of firms reporting an impact in each category and table 6.13 provides the U.S. producers' narrative responses.

Table 6.12 TMFPs: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	3
Denial or rejection of investment proposal	Investment	1
Reduction in the size of capital investments	Investment	1
Return on specific investments negatively impacted	Investment	3
Other investment effects	Investment	2
Any negative effects on investment	Investment	5
Rejection of bank loans	Growth	1
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	1
Ability to service debt	Growth	2
Other growth and development effects	Growth	3
Any negative effects on growth and development	Growth	4
Anticipated negative effects of imports	Future	6

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

Table 6.13 TMFPs: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Denial or rejection of investment proposal	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***

Table continued.

Item	Firm name and narrative on impact of imports
Return on specific investments negatively impacted	***
Other negative effects on investments	***
Other negative effects on investments	***
Rejection of bank loans	***
Problem related to the issue of stocks or bonds	***
Ability to service debt	***
Ability to service debt	***
Other effects on growth and development	***

Table continued.

Item	Firm name and narrative on impact of imports
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part 7: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,
- (V) inventories of the subject merchandise,

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,
- (VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),
- (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and
- (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, "... the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to 113 firms believed to produce and/or export TMFPs from China and Vietnam.³ Usable responses to the Commission's questionnaire were received from 11 firms in total, nine of which produce TMFPs. Four firms reporting reselling TMFPs, two of which, ***, are only resellers of TMFPs.

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

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

Subject foreign industry	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
China	7	***	***
Vietnam	4	***	***

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

Note: "Approximate share of production" reflects the responding firms' estimates of their production as a share of total country production of TMFPs in 2024. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm's share of the total requested.

Note: "Exports as a share of U.S. imports" reflects a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire with imports as reported in Table 4.2 of this report. The approximate share of production in China is likely overestimated as *** reported its share of total production in China in 2024 was *** percent. *** did not provide an estimate for its approximate share of production in 2024. Therefore, Staff believes responding firms from Vietnam represent the vast majority of the share of production of TMFPs from Vietnam, as reflected in the share of exports to U.S. imports from Vietnam. Additionally, *** is a producer in Vietnam but only started production in 2025.

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

Table 7.2 presents information on the TMFP operations of the responding producers in China and Vietnam (or the responding subject producers, by firm) and table 7.3 presents summary information on responding resellers of subject TMFPs. Table 7.4 presents summary data on foreign producers by source.

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

Producer and (subject foreign industry)	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
China: Clean Packaging	***	***	***	***	***	***
China: Green Industrial	***	***	***	***	***	***
China: Rypax	***	***	***	***	***	***
China: Sabert	***	***	***	***	***	***
China: Zhangzhou Huanlv	***	***	***	***	***	***
Vietnam: Honha	***	***	***	***	***	***
Vietnam: Huanlv	***	***	***	***	***	***
Vietnam: Rypax	***	***	***	***	***	***
Vietnam: Yuzhan	***	***	***	***	***	***
All individual producers	79,007	100.0	***	100.0	***	***

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

Note: ***, a TMFP producer in Vietnam, only started production in 2025.

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

Table 7.3 TMFPs: Summary data on responding subject foreign resellers, by firm, 2024

Reseller and (subject foreign industry)	Resales exported to the United States (1,000 pounds)	Share of resales exported to the United States (percent)
China: G-Cove	***	***
China: Jujin Packaging	***	***
China: Sabert	***	***
Vietnam: Yuzhan	***	***
All individual resellers	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". *** reported reselling TMFPs produced by *** in addition to its own production and shipments. *** reported reselling TMFPs produced by *** in addition to its own production and shipments. *** reported reselling TMFPs but only in 2022 and 2023.

Table 7.4 TMFPs: Summary data for subject foreign producers, by source, 2024

Subject foreign industry	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
China	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***
All subject foreign industries	79,007	100.0	43,560	100.0	75,912	***

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

Table 7.5 presents events in the subject countries' industries since January 1, 2022.

Table 7.5 TMFP: Important industry events in China since 2022.

Item	Firm: Event
New Production Line	LuzhouPack: In February 2022, LuzhouPack launched a new PFAS-FREE production line (Nanxiong, China).
Plant Upgrade	LuzhouPack: In March 2024, LuzhouPack's production automation upgrade increased annual capacity to over 120,000 tons (Nanxiong, China).
Memorandum of Understanding (MoU)	G-Cove Technology Group Co Ltd, Sichuan Vanov New Materials Co Ltd (Babo), and Sarawak Timber Industry Development Corp (STIDC): In July 2024, Sichuan Vanov New Materials Co Ltd (Babo) and G-Cove Technologies Co Ltd signed a memorandum of understanding (MoU) with Sarawak Timber Industry Development Corp (STIDC) in China for proposed bamboo processing projects. Babo and G-Cove Technologies would invest in manufacturing facilities to produce bamboo fiber and pulp in Tanjung Manis, central Sarawak, Malaysia and Demak, Indonesia. Shanghai-based G-Cove Technologies manufactures molded boxes for food, medical packaging and industrial uses that uses bamboo pulp produced by Babo. The estimated total investment for the development of the proposed projects is about \$400 million.
Facility Upgrade	FirstPak: In August 2024, ABB announced that its robots were used to upgrade FirstPak's facility in Laibin, China, which handles around 40,000 tons of sugarcane pulp every year, with 35,000 tons turned into finished products. ABB has provided more than 200 high performance robots for material handling, picking and palletizing.

Sources: LuzhouPack, "Milestone of Luzhou Pack," <https://luzhoupack.com/pages/about-us>, retrieved October 22, 2024. Aubrey, Samuel, Borneo Post online, "MoU signed to conduct feasibility study for proposed bamboo-related products mill in Sarawak," <https://www.theborneopost.com/2024/05/28/mou-signed-to-conduct-feasibility-study-for-proposed-bamboo-related-products-mill-in-sarawak/>, retrieved October 22, 2024. Wong, Jack, The Star, <https://www.thestar.com.my/business/business-news/2024/07/01/china-firms-in-bamboo-ventures>, retrieved October 22, 2024. ABB, "Tackling plastic pollution, one solution at a time," <https://global.abb/group/en/stories/sustainability/plastic-pollution>, retrieved August 22, 2025.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of TMFPs since January 1, 2022. Four of the responding producers/exports indicated in their questionnaires that they had experienced such changes. Tables 7.6 and 7.7 present the changes identified by these producers.

Table 7.6 TMFPs: Count of reported changes in operations since January 1, 2022, by change and subject foreign industry

Count in number of firms reporting

Item	China	Vietnam	Subject Producers
Plant openings	0	1	1
Plant closings	0	0	0
Prolonged shutdowns	0	0	0
Production curtailments	1	0	1
Relocations	0	0	0
Expansions	0	1	1
Acquisitions	0	0	0
Consolidations	0	0	0
Weather-related or force majeure events	0	0	0
Other	1	0	1
Any change	2	2	4

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

Note: Staff removed duplicate responses.

Table 7.7 TMFPs: Reported changes in operations in the subject countries since January 1, 2022, by change, subject foreign industry, and firm

Item	Firm name (subject foreign industry) and accompanying narrative response regarding changes in operations
Plant openings	***
Production curtailments	***
Expansions	***
Weather-related or force majeure events	***
Other	***

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

Table 7.8 presents anticipated changes in operations identified by subject producers.

***.

Table 7.8 TMFPs: Reported anticipated changes in operations in the subject countries since January 1, 2022, by change, subject foreign industry, and firm

Producer and (subject foreign industry)	Narrative response
***	***
***	***

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

Installed and practical overall capacity

Table 7.9 presents data on subject producers' installed capacity, practical overall capacity, and practical TMFP capacity and production on the same equipment. *** responding foreign producer (***) reported production of alternate products, other molded fiber products, using the same equipment and/or machinery as used to produce in-scope TMFPs.

Installed and practical overall capacity increased yearly from 2022 to 2024 and was higher in interim 2025 compared to interim 2024. *** reported an overall increase in installed and practical overall capacity from 2022 to 2024, except ***. Installed overall capacity utilization increased overall from 2022 to 2024, peaking at 64.2 percent in 2024, and was higher in interim 2025 compared to interim 2024. Practical overall capacity utilization decreased overall from 2022 to 2024 and was lower in interim 2025 than interim 2024.

Table 7.9 TMFPs: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 pounds; utilization in percent; Interim period is January through March

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	110,002	127,991	129,139	32,423	32,869
Installed overall	Production	58,495	66,949	82,883	18,170	19,414
Installed overall	Utilization	53.2	52.3	64.2	56.0	59.1
Practical overall	Capacity	69,557	84,144	100,247	22,890	25,729
Practical overall	Production	58,495	66,949	82,883	18,170	19,414
Practical overall	Utilization	84.1	79.6	82.7	79.4	75.5
Practical TMFPs	Capacity	69,548	81,583	96,371	21,933	24,817
Practical TMFPs	Production	58,487	64,389	79,007	17,214	18,502
Practical TMFPs	Utilization	84.1	78.9	82.0	78.5	74.6

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

Constraints on capacity

Tables 7.10 and 7.11 presents subject producers' reported production and capacity constraints since January 1, 2022. Nine of the eleven responding foreign producers/exporters reported constraints to practical overall capacity.

Table 7.10 TMFPs: Constraints on practical overall capacity, by subject foreign industry

Count in number of firms reporting

Type of constraint	China	Vietnam	Subject producers
Production bottlenecks	1	0	1
Existing labor force	3	1	4
Supply of material inputs	0	0	0
Fuel or energy	0	0	0
Storage capacity	0	1	1
Logistics/transportation	1	1	2
Other constraints	4	3	7

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

Table 7.11 TMFPs: Subject producers' reported practical overall capacity constraints since January 1, 2022, by constraint and firm

Type of constraint	Subject foreign industry, firm name, and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Storage capacity	***
Logistics/transportation	***
Logistics/transportation	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Operations on TMFPs

Aggregate TMFP operations in the subject countries

Table 7.12 presents information on the TMFP operations of the responding producers (aggregate data for all subject foreign industries). Capacity increased yearly, increasing overall by 38.6 percent from 2022 to 2024; it was 13.1 percent higher in interim 2025 than in interim 2024. Capacity is projected to decrease by 1.8 percent from 2024 to 2025 and to increase by 8.7 percent from 2025 to 2026. Production moved similarly, increasingly yearly, overall ending 2024 35.1 percent higher than in 2022 and was 7.5 percent higher in interim 2025 compared to interim 2024. Production is projected to decrease by 8.6 percent from 2024 to 2025 and to increase by 12.0 percent from 2025 to 2026. The practical capacity utilization of responding producers decreased irregularly, overall declining by 2.1 percentage points from 2022 to 2024 and was lower in interim 2025 than in interim 2024. Capacity utilization is projected to decrease from 2024 to 2025 but to increase from 2025 to 2026.

The responding foreign producers reported the majority of their shipments were home market shipments in 2022 before export shipments surpassed home market shipments in 2023 and continued to increase into 2024. Export markets continued to account for the largest share of shipments in interim periods and projected years. Commercial shipments accounted over *** percent of home market shipments in each year from 2022 to 2024, the interim periods, and projected years.

Total exports to the United States increased yearly from 2022 to 2024 and were higher in interim 2025 than in interim 2024. Compared to 2024, exports to the United States are projected to decrease in 2025 and to increase from 2025 to 2026. Exports to all other markets fluctuated, overall increasing from 2022 to 2024 and were higher in interim 2025 than in interim 2024. Exports to other markets are projected to decrease from 2024 to 2025 and increase from 2025 to 2026.

Subject producers' and resellers' exports to the United States as a share of their total shipments were over *** percent for each year, increasing yearly, and the interim periods (with interim 2025 representing the period with the highest share at *** percent). The share of total exports to the United States as a share of their total shipments is projected to decrease back to 2022 levels (around *** percent) in 2025 and 2026.

Table 7.12 TMFPs: Data on subject foreign industries, by item and period

Quantity in 1,000 pounds; interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity	69,548	81,583	96,371	21,933	24,817	94,666	102,878
Production	58,487	64,389	79,007	17,214	18,502	72,176	80,803
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	29,787	26,964	25,383	6,133	5,246	25,986	27,989
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	27,132	34,671	50,529	9,441	15,635	43,683	49,082
Total shipments	56,919	61,635	75,912	15,574	20,881	69,669	77,071
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***

Table continued.

Table 7.12 (Continued) TMFPs: Data on subject foreign industries, by period

Shares and ratios in percent; Interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity utilization ratio	84.1	78.9	82.0	78.5	74.6	76.2	78.5
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	52.3	43.7	33.4	39.4	25.1	37.3	36.3
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	47.7	56.3	66.6	60.6	74.9	62.7	63.7
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Total exports to the United States by producers	***	***	***	***	***	***	***
Total exports to the United States by resellers	***	***	***	***	***	***	***
Adjusted total shipments exported to the United States	45.2	52.1	59.2	53.4	67.7	55.5	55.5

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

Practical TMFPs capacity and production by subject foreign industry

Table 7.13 presents information on subject producers' production, capacity, and capacity utilization by subject country. China accounted for the *** share of TMFP production from 2022 to 2024 and interim 2024 but Vietnam accounted for the *** of TMFP production interim 2025 and projected production in 2025 and 2026.

Table 7.13 TMFPs: Subject producers' output: Practical capacity, by source and period

Practical capacity

Quantity in 1,000 pounds; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	69,548	81,583	96,371	21,933	24,817	94,666	102,878

Table continued.

Table 7.13 (Continued) TMFPs: Subject producers' output: Production, by source and period

Production

Production in 1,000 pounds; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	58,487	64,389	79,007	17,214	18,502	72,176	80,803

Table continued.

Table 7.13 (Continued) TMFPs: Subject producers' output: Capacity utilization, by source and period

Capacity utilization

Capacity utilization in percent; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	84.1	78.9	82.0	78.5	74.6	76.2	78.5

Table continued.

Table 7.13 (Continued) TMFPs: Subject producers' output: Share of production, by source and period

Share of production

Share in percent; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Responding Chinese producers' capacity increased yearly from 2022 to 2024, ending 2024 *** percent higher than in 2022 and was slightly higher in interim 2025 compared to interim 2024. Production reported by Chinese producers' decreased from 2022 to 2023, increased from 2023 to 2024, increasing overall by *** percent from 2022 to 2024 and was lower in interim 2025 compared to interim 2024. Capacity is expected to decrease both from 2024 to 2025 and from 2025 to 2026 while production is expected to also decrease from 2024 to 2025 but to increase slightly from 2025 to 2026. Following the trend in production, capacity utilization decreased irregularly from 2022 to 2024, decreasing overall by *** percentage points and was lower in interim 2025 than interim 2024. Additionally, the capacity utilization is projected to decrease from 2024 to 2025 and to increase from 2025 to 2026.

Vietnamese producers' capacity and production increased by *** percent and *** percent, respectively, from 2022 to 2024. Their capacity and production were both higher in interim 2025 than in interim 2024. As capacity increased at a rate higher than production, Vietnamese producers' capacity utilization decreased slightly from 2022 to 2024 and was lower in interim 2025 than in interim 2024. Their capacity and production are projected to be higher in 2025 than in 2024 and continued to increase from 2025 to 2026.

TMFPs exports, by subject country

Table 7.14 presents information on subject producers' (and resellers) exports of TMFPs by subject country. Subject producers' exports to the United States from both subject countries increased from 2022 to 2024, Exports from China were slightly lower in interim 2025 than in interim 2024 while exports from Vietnam were higher. Exports from China are projected to decrease from 2024 to 2025 and continue to decrease from 2025 to 2026 while exports from Vietnam and are projected to increase from both 2024 to 2025 and from 2025 to 2026. During 2022 to 2024, the share of total shipments exported to the United States increased by *** percentage points for China, and *** percentage points for Vietnam. The share of total shipments exported to the United States was higher in interim 2025 compared to interim 2024 for both China and Vietnam. The share of total shipments exported to the United States is expected to decrease by *** percentage points for China from 2024 to 2025 and continue to decrease from 2025 to 2026 while Vietnamese producers expect a slight increase in 2025 compared to 2024 and to remain constant in 2026.

Table 7.14 TMFPs: Subject producers' (and resellers') exports: Exports to the United States, by source and period

Exports to the United States

Quantity in 1,000 pounds; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table 7.14 (Continued) TMFPs: Subject producers' (and resellers') exports: Share of total shipments exported to the United States, by source and period

Share of total shipments exported to the United States

Share in percent; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table 7.14 (Continued) TMFPs: Subject producers' (and resellers') exports: Exports to all destination markets, by source and period

Total exports

Quantity in 1,000 pounds; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table 7.14 (Continued) TMFPs: Subject producers' (and resellers') exports: Share of total shipments exported to all destinations, by source and period

Share of total shipments exported

Share in percent; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

TMFPs inventories, by subject foreign industry

Table 7.15 presents information on ending inventory of the responding producers by subject foreign country. Overall, subject producers' TMFPs inventories increased yearly from 2022 to 2024, ending 2024 *** percent higher than 2022 but was *** percent lower in interim 2025 compared to interim 2024, and are projected to decrease from 2024 to 2025 but to increase from 2025 to 2026. During 2022 to 2024, TMFPs inventories in China fluctuated, decreasing from 2022 to 2023, increasing from 2023 to 2024, decreasing overall by *** percent from 2022 to 2024 and was lower in interim 2025 than in interim 2026. TMFPs inventories in Vietnam increased from 2022 to 2023, decreased from 2023 to 2024 ending 2024 *** percent higher than in 2022, but was *** percent lower in interim 2025 compared to interim 2024. TMFP inventories from China are projected to decrease from 2024 to 2025 and from 2025 to 2026 while TMFP inventories from Vietnam are projected to increase over the same periods.

During 2022 to 2024, the ratio of ending inventories to total shipments decreased irregularly from *** percent to *** percent for China and decreased yearly from *** percent to *** percent for Vietnam. It was lower in interim 2025 than in interim 2024 for both China and Vietnam. The ratio of ending inventories to total shipments for China is projected to decrease from 2024 to 2025 and to continue to decline from 2025 to 2026 it is projected to decrease from 2024 to 2025 but to increase slightly from 2025 to 2026 for Vietnam.

Table 7.15 TMFPs: Subject foreign industries' ending inventories: Ending inventories, by source and period

Quantity in 1,000 pounds; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table 7.15 (Continued) TMFPs: Subject foreign industries' ending inventories: Ratio of ending inventories to total shipments, by source and period

Ratio in percent; interim period is January through March

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
China	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Alternative products

As shown in table 7.16, responding firm in China and Vietnam produced other products on the same equipment and machinery used to produce TMFPs. TMFPs accounted for the vast majority of overall production, accounting for at least *** percent of all production in every period for which data were collected. *** reported it produced other molded fiber products on same machinery and sharply increased its production of molded fiber products from 2022 to 2024 but was lower in interim 2025 compared to interim 2024.

Table 7.16 TMFPs: Subject foreign industries’ overall production on the same equipment as in-scope production, by product type and period

Quantities in 1,000 pounds; shares and ratios in percent; interim period is January through March

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
TMFPs	Quantity	58,487	64,389	79,007	17,214	18,502
Other MFPs	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
TMFPs	Share	***	***	***	***	***
Other MFPs	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

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

Exports

Table 7.17 presents Global Trade Atlas (“GTA”) data for exports under HS subheading 4823.70 (“molded or pressed articles of paper pulp”), a category which includes TMFPs, from subject countries to the United States and to all destination markets. The table presents the value of exports from subject exporters to the United States, global exports from subject exporters (exports to all destination markets), and shares of exports exported to the United States, by exporter and period. Subject exporters accounted for between 42.2 percent and 32.0 percent of the value of total exports of molded or pressed articles of paper pulp to the United States. The share of such exports exported to the United States was the largest for Vietnam. By value, exports to the United States and to all destination markets collectively reported for the

subject foreign industries under this category increased by 114.8 percent and 63.2 percent, respectively, from 2022 to 2024.

Table 7.17 Molded or pressed articles of paper pulp: Global exports from subject exporters: Exports to the United States, by exporter and period

Value in 1,000 dollars

Exporter	Measure	2022	2023	2024
China	Value	129,223	165,906	293,753
Vietnam	Value	18,645	23,204	23,858
Subject exporters	Value	147,868	189,110	317,610

Table continued.

Table 7.17 (Continued) Molded or pressed articles of paper pulp: Global exports from subject exporters: Exports to all destination markets, by exporter and period

Value in 1,000 dollars

Exporter	Measure	2022	2023	2024
China	Quantity	431,603	453,612	711,523
Vietnam	Quantity	29,979	32,739	41,645
Subject exporters	Quantity	461,582	486,351	753,168

Table continued.

Table 7.17 (Continued) Molded or pressed articles of paper pulp: Global exports from subject exporters: Share of exports exported to the United States, by exporter and period

Shares in percent

Exporter	Measure	2022	2023	2024
China	Share	29.9	36.6	41.3
Vietnam	Share	62.2	70.9	57.3
Subject exporters	Share	32.0	38.9	42.2

Source: Official exports statistics and official global imports statistics from Vietnam (constructed exports) under HS subheadings 4823.70 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed July 22nd, 2025.

Note: Shares represent the shares of value exported to the United States out of all destination markets. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. inventories of imported merchandise

Table 7.18 presents data on U.S. importers' reported inventories of TMFPs. U.S. importers' inventories of TMFP imports from subject sources increased yearly, increasing overall by *** percent from 2022 to 2024. During this period, such inventories increased by *** percent for imports from China, *** percent for imports from Vietnam, and *** percent for imports from nonsubject sources. Subject U.S. importers' ratio of inventories to U.S. shipments of subject imports increased slightly from 2022 to 2024 but increased from *** percent in interim 2024 to *** percent in interim 2025.

Table 7.18 TMFPs: U.S. importers' inventories and their ratio to select items, by source and period

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

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	67,082	66,062	80,035	68,709	96,035
Ratio to imports	All import sources	23.3	24.9	26.1	23.0	30.2
Ratio to U.S. shipments of imports	All import sources	26.2	25.1	27.4	24.3	37.5
Ratio to total shipments of imports	All import sources	25.9	24.9	27.2	24.1	37.3

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of TMFPs from China and Vietnam after March 2025. Their reported data are presented in table 7.19. The majority of arranged imports of TMFPs after March 2025 were nonsubject sources, accounting for approximately *** percent. The leading individual source of U.S. importers' arranged subject imports from April to June (Q2) 2025 was China but was surpassed by arranged imports from Vietnam for the remaining 2025 and first quarter of 2026. Arranged imports from subject sources were approximately *** percent of total arranged imports of TMFPs from March 2025 to March 2026.

Table 7.19 TMFPs: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds

Source	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Total
China	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject Sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

Based on available information, TMFPs from China and Vietnam have not been subject to antidumping or countervailing duty investigations outside the United States.⁴

⁴ World Trade Organization ("WTO"), Trade Remedies Data Portal, <https://trade-remedies.wto.org/en>, retrieved August 22, 2025.

Information on nonsubject countries

Table 7.20 presents global export data for molded or pressed articles of paper pulp (HS 4823.70), a category which includes TMFPs. China was the largest exporter in 2024 and accounted for 38.5 percent of total global exports by value; Vietnam accounted for 2.3 percent.

Table 7.20 Molded or pressed articles of paper pulp: Global exports by exporter and period

Values in dollars; shares in percent

Exporting country	Measure	2022	2023	2024
United States	Value	90,966	102,579	110,224
China	Value	431,603	453,612	711,523
Vietnam	Value	29,979	32,739	41,645
Subject exporters	Value	461,582	486,351	753,168
Germany	Value	104,496	101,159	106,368
Canada	Value	79,199	80,330	99,774
Netherlands	Value	69,774	86,610	85,598
Czech Republic	Value	72,980	75,418	77,910
Mexico	Value	58,717	65,429	67,223
Hungary	Value	52,959	94,796	64,974
Spain	Value	62,962	61,102	60,971
Malaysia	Value	40,862	49,584	41,080
Belgium	Value	36,341	37,042	35,528
Croatia	Value	36,597	38,341	28,071
All other exporters	Value	300,865	296,152	316,181
All reporting exporters	Value	1,468,298	1,574,893	1,847,071
United States	Share of value	6.2	6.5	6.0
China	Share of value	29.4	28.8	38.5
Vietnam	Share of value	2.0	2.1	2.3
Subject exporters	Share of value	31.4	30.9	40.8
Germany	Share of value	7.1	6.4	5.8
Canada	Share of value	5.4	5.1	5.4
Netherlands	Share of value	4.8	5.5	4.6
Czech Republic	Share of value	5.0	4.8	4.2
Mexico	Share of value	4.0	4.2	3.6
Hungary	Share of value	3.6	6.0	3.5
Spain	Share of value	4.3	3.9	3.3
Malaysia	Share of value	2.8	3.1	2.2
Belgium	Share of value	2.5	2.4	1.9
Croatia	Share of value	2.5	2.4	1.5
All other exporters	Share of value	20.5	18.8	17.1
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics and official global imports statistics from Vietnam (constructed exports) under HS subheadings 4823.70 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed July 22, 2025.

Note: United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2024 data.

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
89 FR 83051, October 15, 2024	Thermoformed Molded Fiber Products From China and Vietnam; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	https://www.govinfo.gov/content/pkg/FR-2024-10-15/pdf/2024-23714.pdf
89 FR 87551, November 4, 2024	Thermoformed Molded Fiber Products From the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations	https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25562.pdf
89 FR 87556, November 4, 2024	Thermoformed Molded Fiber Products From the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Countervailing Duty Investigations	https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25561.pdf
89 FR 91321, November 19, 2024	Thermoformed Molded Fiber Products From the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Countervailing Duty Investigations; Correction	https://www.govinfo.gov/content/pkg/FR-2024-11-19/pdf/2024-26908.pdf
89 FR 94762, November 29, 2024	Thermoformed Molded Fiber Products From China and Vietnam	https://www.govinfo.gov/content/pkg/FR-2024-11-29/pdf/2024-27937.pdf
89 FR 103778, December 19, 2024	Thermoformed Molded Fiber Products From the People's Republic of China and the Socialist Republic of Vietnam: Postponement of Preliminary Determination in the Countervailing Duty Investigations	https://www.govinfo.gov/content/pkg/FR-2024-12-19/pdf/2024-30306.pdf
90 FR 11153, March 4, 2025	Thermoformed Molded Fiber Products From the People's Republic of China and the Socialist Republic of Vietnam: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations	https://www.govinfo.gov/content/pkg/FR-2025-03-04/pdf/2025-03450.pdf
90 FR 12123, March 14, 2025	Thermoformed Molded Fiber Products From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination	https://www.govinfo.gov/content/pkg/FR-2025-03-14/pdf/2025-04093.pdf
90 FR 12126, March 14, 2025	Thermoformed Molded Fiber Products	https://www.govinfo.gov/content/pkg/FR-2025-03-14/pdf/2025-04094.pdf

Citation	Title	Link
	From the Socialist Republic of Vietnam: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, and Alignment of Final Determination With Final Antidumping Duty Determination	
90 FR 14243, March 31, 2025	Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, and Alignment of Final Determination With Final Antidumping Duty Determination; Correction	https://www.govinfo.gov/content/pkg/FR-2025-03-31/pdf/2025-05418.pdf
90 FR 14246, March 31, 2025	Thermoformed Molded Fiber Products From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination; Correction	https://www.govinfo.gov/content/pkg/FR-2025-03-31/pdf/2025-05417.pdf
90 FR 20147, May 12, 2025	Thermoformed Molded Fiber Products From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures	https://www.govinfo.gov/content/pkg/FR-2025-05-12/pdf/2025-08304.pdf
90 FR 20153, May 12, 2025	Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures	https://www.govinfo.gov/content/pkg/FR-2025-05-12/pdf/2025-08305.pdf
90 FR 23066, May 30, 2025	Thermoformed Molded Fiber Products From China and Vietnam; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations	https://www.govinfo.gov/content/pkg/FR-2025-05-30/pdf/2025-09822.pdf
90 FR 24571, June 11, 2025	Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures; Correction	https://www.govinfo.gov/content/pkg/FR-2025-06-11/pdf/2025-10632.pdf

Citation	Title	Link
90 FR 24590, June 11, 2025	Thermoformed Molded Fiber Products From the People's Republic of China: Correction and Amended Preliminary Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2025-06-11/pdf/2025-10631.pdf
90 FR 25642, June 17, 2025	Thermoformed Molded Fiber Products From China and Vietnam; Revised Schedule for the Subject Investigations	https://www.govinfo.gov/content/pkg/FR-2025-06-17/pdf/2025-10964.pdf
90 FR 46800, September 30, 2025	Thermoformed Molded Fiber Products From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2025-09-30/pdf/2025-18891.pdf
90 FR 46791, September 30, 2025	Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2025-09-30/pdf/2025-18890.pdf
90 FR 46787, September 30, 2025	Thermoformed Molded Fiber Products From the People's Republic of China: Final Affirmative Countervailing Duty Determination	https://www.govinfo.gov/content/pkg/FR-2025-09-30/pdf/2025-18892.pdf
90 FR 46805, September 30, 2025	Thermoformed Molded Fiber Products From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination	https://www.govinfo.gov/content/pkg/FR-2025-09-30/pdf/2025-18899.pdf
90 FR 52697, November 21, 2025	Thermoformed Molded Fiber Products From China and Vietnam; Revised Schedule for the Subject Proceeding	https://www.govinfo.gov/content/pkg/FR-2025-11-21/pdf/2025-20514.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

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

Subject: Thermoformed Molded Fiber Products from China and Vietnam

Inv. Nos.: 701-TA-739-740 and 731-TA-1716-1717 (Final)

Date and Time: September 30, 2025 - 9:30 a.m.

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

OPENING REMARKS:

In Support of Imposition (**Roop Bhatti**, Cassidy Levy Kent (USA) LLP)
In Opposition to Imposition (**Irene Chen**, VCL Law LLP)

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

Cassidy Levy Kent (USA) LLP
Washington, DC
on behalf of

Genera
Tellus Products, LLC
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,
Allied Industrial and Service Workers International Union, AFL-CIO ("USW")

Ben Mascarello, Chief Executive Officer, Genera

Kelly Tiller, Founder and Chief Executive Officer, Genera

Gabriel Buenaventura, President, Tellus Products, LLC

Andrew B. Dermont, Director of Finance and Strategy, Tellus Products, LLC

Rebecca Serafini, Senior Director of Sales and Marketing, Tellus Products, LLC

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

Alonzo Scott, Key Staff Member for the USW Paper Sector, USW

Yohai Baisburd	)
Roop Bhatti	)
James R. Cannon, Jr.	) – OF COUNSEL
Margaret E. Monday	)
Natalia M. King	)

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

VCL Law LLP
Vienna, VA
on behalf of

World Centric

Aseem Das (remote witness), Chief Executive Officer, World Centric

Irene Chen	) – OF COUNSEL

Interested Party

KD Distributing, LLC dba Ultra Green Packaging
Mound, MN

Kristin Davidson, President, KD Distributing, LLC

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Yohai Baisburd**, Cassidy Levy Kent (USA) LLP)

In Opposition to Imposition (**Irene Chen**, VCL Law LLP)

APPENDIX C

SUMMARY DATA

Table C.1: TMFPs: Summary data concerning the U.S. market	C.3
Table C.2: TMFPs and Other MFPs: Summary data concerning the U.S. market.....	C.7

Co-extensive

Table C.1

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

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

Item	Reported data					Period change comparisons			
	Calendar year		2024	Interim		Calendar year		Interim	
	2022	2023		2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Producers' share (fn1).....									
Established producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Newer producers.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All U.S. producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1).....									
Established producers.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Newer producers.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All U.S. producers.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	215,983	205,691	237,153	55,522	39,922	▲9.8	▼(4.8)	▲15.3	▼(28.1)
Value.....	530,400	466,322	477,959	110,127	86,836	▼(9.9)	▼(12.1)	▲2.5	▼(21.1)
Unit value.....	\$2.46	\$2.27	\$2.02	\$1.98	\$2.18	▼(17.9)	▼(7.7)	▼(11.1)	▲9.7
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Vietnam:									
Quantity.....	7,832	19,876	21,921	5,924	11,467	▲179.9	▲153.8	▲10.3	▲93.6
Value.....	14,580	29,467	32,786	7,956	16,659	▲124.9	▲102.1	▲11.3	▲109.4
Unit value.....	\$1.86	\$1.48	\$1.50	\$1.34	\$1.45	▼(19.7)	▼(20.4)	▲0.9	▲8.2
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources:									
Quantity.....	223,815	225,567	259,074	61,446	51,389	▲15.8	▲0.8	▲14.9	▼(16.4)
Value.....	544,980	495,789	510,745	118,083	103,495	▼(6.3)	▼(9.0)	▲3.0	▼(12.4)
Unit value.....	\$2.43	\$2.20	\$1.97	\$1.92	\$2.01	▼(19.0)	▼(9.7)	▼(10.3)	▲4.8
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Quantity.....	32,502	37,997	32,827	9,353	12,608	▲1.0	▲16.9	▼(13.6)	▲34.8
Value.....	55,811	60,019	44,454	12,738	24,237	▼(20.3)	▲7.5	▼(25.9)	▲90.3
Unit value.....	\$1.72	\$1.58	\$1.35	\$1.36	\$1.92	▼(21.1)	▼(8.0)	▼(14.3)	▲41.2
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources:									
Quantity.....	256,317	263,564	291,901	70,799	63,997	▲13.9	▲2.8	▲10.8	▼(9.6)
Value.....	600,791	555,808	555,199	130,821	127,732	▼(7.6)	▼(7.5)	▼(0.1)	▼(2.4)
Unit value.....	\$2.34	\$2.11	\$1.90	\$1.85	\$2.00	▼(18.9)	▼(10.0)	▼(9.8)	▲8.0
Ending inventory quantity.....	67,082	66,062	80,035	68,709	96,035	▲19.3	▼(1.5)	▲21.2	▲39.8

Table continued.

Table C.1 Continued

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

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

Item	Reported data					Period change comparisons			
	Calendar year		2024	Interim	2025	Calendar year		Interim	2024–25
	2022	2023				2022–24	2022–23		
Established U.S. producers':									
Practical capacity quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Newer U.S. producers':									
Practical capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Production workers.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▼***	▼***
All U.S. producers':									
Practical capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production workers.....	***	***	***	***	***	▲***	▲***	***	▲***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

Table C.1 Continued

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

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

Item	Reported data					Period change comparisons			
	Calendar year		2024	Interim 2024	2025	Calendar year		Interim 2024–25	
	2022	2023				2022–24	2022–23		
Established U.S. producers':									
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Research and development expenses.....	***	***	***	***	***	▼***	▲***	▼***	***
Total assets.....	***	***	***	***	***	▲***	▲***	▲***	***
Newer U.S. producers':									
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total assets.....	***	***	***	***	***	▲***	▲***	▲***	***

Table continued.

Table C.1 Continued

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

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

Item	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
All U.S. producers':									
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Total assets.....	***	***	***	***	***	▲***	▲***	▲***	***

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

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Expanded like product

Table C.2

TMFPs and other MFPs: Summary data concerning the U.S. market, by item and period

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

Item	Reported data					Period change comparisons				
	Calendar year			Interim		Calendar year			Interim	
	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25	
U.S. consumption quantity:										
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Importers' share (fn1):										
TMFPs: China.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
TMFPs: Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
TMFPs: Subject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***	
TMFPs: Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***	
TMFPs: All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***	
Other MFPs: All import sources..	***	***	***	***	***	▼***	▼***	▼***	▼***	
All MFPs: All import sources...	***	***	***	***	***	▼***	▼***	▲***	▼***	
U.S. consumption value:										
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Importers' share (fn1):										
TMFPs: China.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
TMFPs: Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
TMFPs: Subject sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
TMFPs: Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***	
TMFPs: All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
Other MFPs: All import sources..	***	***	***	***	***	▲***	▲***	▼***	▲***	
All MFPs: All import sources...	***	***	***	***	***	▼***	▼***	▲***	▼***	
U.S. importers' U.S. shipments of imports from:										
TMFPs: China:										
Quantity.....	215,983	205,691	237,153	55,522	39,922	▲9.8	▼(4.8)	▲15.3	▼(28.1)	
Value.....	530,400	466,322	477,959	110,127	86,836	▼(9.9)	▼(12.1)	▲2.5	▼(21.1)	
Unit value.....	\$2.46	\$2.27	\$2.02	\$1.98	\$2.18	▼(17.9)	▼(7.7)	▼(11.1)	▲9.7	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
TMFPs: Vietnam:										
Quantity.....	7,832	19,876	21,921	5,924	11,467	▲179.9	▲153.8	▲10.3	▲93.6	
Value.....	14,580	29,467	32,786	7,956	16,659	▲124.9	▲102.1	▲11.3	▲109.4	
Unit value.....	\$1.86	\$1.48	\$1.50	\$1.34	\$1.45	▼(19.7)	▼(20.4)	▲0.9	▲8.2	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
TMFPs: Subject sources:										
Quantity.....	223,815	225,567	259,074	61,446	51,389	▲15.8	▲0.8	▲14.9	▼(16.4)	
Value.....	544,980	495,789	510,745	118,083	103,495	▼(6.3)	▼(9.0)	▲3.0	▼(12.4)	
Unit value.....	\$2.43	\$2.20	\$1.97	\$1.92	\$2.01	▼(19.0)	▼(9.7)	▼(10.3)	▲4.8	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
TMFPs: Nonsubject sources:										
Quantity.....	32,502	37,997	32,827	9,353	12,608	▲1.0	▲16.9	▼(13.6)	▲34.8	
Value.....	55,811	60,019	44,454	12,738	24,237	▼(20.3)	▲7.5	▼(25.9)	▲90.3	
Unit value.....	\$1.72	\$1.58	\$1.35	\$1.36	\$1.92	▼(21.1)	▼(8.0)	▼(14.3)	▲41.2	
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
TMFPs: All import sources:										
Quantity.....	256,317	263,564	291,901	70,799	63,997	▲13.9	▲2.8	▲10.8	▼(9.6)	
Value.....	600,791	555,808	555,199	130,821	127,732	▼(7.6)	▼(7.5)	▼(0.1)	▼(2.4)	
Unit value.....	\$2.34	\$2.11	\$1.90	\$1.85	\$2.00	▼(18.9)	▼(10.0)	▼(9.8)	▲8.0	
Ending inventory quantity.....	67,082	66,062	80,035	68,709	96,035	▲19.3	▼(1.5)	▲21.2	▲39.8	
Other MFPs: All import sources:										
Quantity.....	78,181	77,207	68,577	6,500	5,315	▼(12.3)	▼(1.2)	▼(11.2)	▼(18.2)	
Value.....	63,886	69,778	64,122	6,998	7,516	▲0.4	▲9.2	▼(8.1)	▲7.4	
Unit value.....	\$0.82	\$0.90	\$0.94	\$1.08	\$1.41	▲14.4	▲10.6	▲3.5	▲31.3	
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
All MFPs: All import sources:										
Quantity.....	334,498	340,771	360,478	77,299	69,312	▲7.8	▲1.9	▲5.8	▼(10.3)	
Value.....	664,677	625,586	619,321	137,819	135,248	▼(6.8)	▼(5.9)	▼(1.0)	▼(1.9)	
Unit value.....	\$1.99	\$1.84	\$1.72	\$1.78	\$1.95	▼(13.5)	▼(7.6)	▼(6.4)	▲9.4	
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	

Table continued.

Table C.2 Continued

TMFPs and other MFPs: Summary data concerning the U.S. market, by item and period

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

Item	Reported data					Period change comparisons			
	Calendar year		2024	Interim	2025	Calendar year		Interim	
	2022	2023				2022–24	2022–23	2023–24	2024–25
U.S. producers:									
Average production capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production workers.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Total assets.....	***	***	***	***	***	▲***	▲***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, 7, and appendix F of this report.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

APPENDIX D

NARRATIVES COMPARING TMFPS TO OTHER MFPS

Table D.1 All MFPs: U.S. producers' narratives comparing TMFPs to other MFPs

Factor	Producer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***

Factor	Producer name and narrative response on comparability
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***

Factor	Producer name and narrative response on comparability
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***

Factor	Producer name and narrative response on comparability
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***

Factor	Producer name and narrative response on comparability
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

Table D.2 All MFPs: U.S. importers' narratives comparing TMFPs to other MFPs

Factor	Importer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***

Factor	Importer name and narrative response on comparability
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Importer name and narrative response on comparability
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***

Factor	Importer name and narrative response on comparability
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Importer name and narrative response on comparability
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Importer name and narrative response on comparability
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

Factor	Importer name and narrative response on comparability
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

Table D.3 All MFPs: U.S. purchasers' narratives comparing TMFPs to other MFPs

Factor	Purchaser name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***

Factor	Purchaser name and narrative response on comparability
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***

Factor	Purchaser name and narrative response on comparability
Price	***
Price	***
Price	***
Price	***
Price	***

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

APPENDIX E

U.S. PRODUCERS' AND U.S. IMPORTERS' SHIPMENTS BY

PRODUCT FORM AND FIBER APPEARANCE

Table E.1 TMFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain unbleached	All plain	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	***
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	***
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	***

Table continued.

Table E.1 (Continued) TMFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Share and ratio in percent; shares are calculated down and across; ratio is the ratio of shipment quantity to overall apparent consumption

Product form	Measure	Plain bleached	Plain unbleached	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0
Round or oval plates	Ratio	***	***	***	***	***
Square or rectangular trays	Ratio	***	***	***	***	***
Bowls	Ratio	***	***	***	***	***
Clamshells	Ratio	***	***	***	***	***
Lids	Ratio	***	***	***	***	***
Cup carriers	Ratio	***	***	***	***	***
Portion cups	Ratio	***	***	***	***	***
All other products	Ratio	***	***	***	***	***
All product forms	Ratio	***	***	***	***	***

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

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

Table E.2 TMFPs: U.S. importers' U.S. shipments of imports from China in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	237,152
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	477,960
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	2.02

Table continued.

Table E.2 (Continued) TMFPs: U.S. importers' U.S. shipments of imports from China in 2024, by product form and fiber appearance

Share and ratio in percent; shares are calculated down and across; ratio is the ratio of shipment quantity to overall apparent consumption

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0
Round or oval plates	Ratio	***	***	***	***	***
Square or rectangular trays	Ratio	***	***	***	***	***
Bowls	Ratio	***	***	***	***	***
Clamshells	Ratio	***	***	***	***	***
Lids	Ratio	***	***	***	***	***
Cup carriers	Ratio	***	***	***	***	***
Portion cups	Ratio	***	***	***	***	***
All other products	Ratio	***	***	***	***	***
All product forms	Ratio	***	***	***	***	***

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

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

Table E.3 TMFPs: U.S. importers' U.S. shipments of imports from Vietnam in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	21,922
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	32,785
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	1.50

Table continued.

Table E.3 (Continued)TMFPs: U.S. importers' U.S. shipments of imports from Vietnam in 2024, by product form and fiber appearance

Share and ratio in percent; shares are calculated down and across; ratio is the ratio of shipment quantity to overall apparent consumption

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product types	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product types	Share of value	***	***	***	***	100.0
Round or oval plates	Ratio	***	***	***	***	***
Square or rectangular trays	Ratio	***	***	***	***	***
Bowls	Ratio	***	***	***	***	***
Clamshells	Ratio	***	***	***	***	***
Lids	Ratio	***	***	***	***	***
Cup carriers	Ratio	***	***	***	***	***
Portion cups	Ratio	***	***	***	***	***
All other products	Ratio	***	***	***	***	***
All product types	Ratio	***	***	***	***	***

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

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

Table E.4 TMFPs: U.S. importers' U.S. shipments of imports from nonsubject sources in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	32,828
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	44,456
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	1.35

Table continued.

Table E.4 (Continued)TMFPs: U.S. importers' U.S. shipments of imports from nonsubject sources in 2024, by product form and fiber appearance

Share and ratio in percent; shares are calculated down and across; ratio is the ratio of shipment quantity to overall apparent consumption

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0
Round or oval plates	Ratio	***	***	***	***	***
Square or rectangular trays	Ratio	***	***	***	***	***
Bowls	Ratio	***	***	***	***	***
Clamshells	Ratio	***	***	***	***	***
Lids	Ratio	***	***	***	***	***
Cup carriers	Ratio	***	***	***	***	***
Portion cups	Ratio	***	***	***	***	***
All other products	Ratio	***	***	***	***	***
All product forms	Ratio	***	***	***	***	***

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

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

Table E.5 TMFPs: U.S. importers' U.S. shipments of imports from all import sources in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other forms	Quantity	***	***	***	***	***
All product types	Quantity	***	***	***	***	291,902
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	555,201
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	1.90

Table continued.

Table E.5 (Continued) TMFPs: U.S. importers' U.S. shipments of imports from all import sources in 2024, by product form and fiber appearance

Share and ratio in percent; shares are calculated down and across; ratio is the ratio of shipment quantity to overall apparent consumption

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0
Round or oval plates	Ratio	***	***	***	***	***
Square or rectangular trays	Ratio	***	***	***	***	***
Bowls	Ratio	***	***	***	***	***
Clamshells	Ratio	***	***	***	***	***
Lids	Ratio	***	***	***	***	***
Cup carriers	Ratio	***	***	***	***	***
Portion cups	Ratio	***	***	***	***	***
All other products	Ratio	***	***	***	***	***
All product forms	Ratio	***	***	***	***	***

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

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

Table E.6 TMFPs: U.S. shipments from all sources in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	***
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	***
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	***

Table continued.

Table E.6 (Continued) TMFPs: U.S. shipments from all sources in 2024, by product form and fiber appearance

Share and ratio in percent; shares are calculated down and across; ratio is the ratio of shipment quantity to overall apparent consumption

Product form	Measure	Plain bleached	Plain unbleached	Plain total	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0
Round or oval plates	Ratio	***	***	***	***	***
Square or rectangular trays	Ratio	***	***	***	***	***
Bowls	Ratio	***	***	***	***	***
Clamshells	Ratio	***	***	***	***	***
Lids	Ratio	***	***	***	***	***
Cup carriers	Ratio	***	***	***	***	***
Portion cups	Ratio	***	***	***	***	***
All other products	Ratio	***	***	***	***	***
All product forms	Ratio	***	***	***	***	100.0

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

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

APPENDIX F

DATA FOR OTHER MFPS AND ALL MFPS

Table F.1 All MFPs: U.S. producers, their position on the petition, location of production, and share of reported production, 2024

Shares in percent

Firm	Position on petition	Production location(s)	Share of production of Other MFPs	Share of production of All MFPs
Dart	***	Mason, MI Lancaster, PA	***	***
Fibreform	***	Germantown, Wi Mount Sterling, KY	***	***
Genera	Petitioner	Vonore, TN	***	***
Hartmann	***	Rolla, MO	***	***
Huhtamaki	***	Waterville, ME Sacramento, CA Hammond, IN Albertville, AL	***	***
Kanbol	***	Auburn, KY	***	***
MFT-CKF	***	Clinton, Iowa El Paso, Texas	***	***
Pactiv	***	Macon, GA Moorhead, MN City of Industry, CA Plattsburg, NY	***	***
Reynolds	***	Red Bluff, CA	***	***
Sabert	***	Greenville, TX	***	***
Tekni-Plex	***	Tacoma, WA Van Wert, OH Wenatchee, WA	***	***
Tellus	Petitioner	Belle Glade, FL	***	***
All firms	Various	Various	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires. Email from ***, September 4, 2025.

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

Table F.2 Other MFPs: U.S. producers' ownership, related and/or affiliated firms, 2024

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

Source: Compiled from data submitted in response to Commission questionnaires

Table F.3 Other MFPs: U.S. producer *'s output, by item and period**

Capacity and production in 1,000 pounds; capacity utilization ratio is in percent; interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Practical Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity Utilization	***	***	***	***	***

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

Figure F.1 Other MFPs: U.S. producer *'s output, by item and period**

* * * * *

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

Table F.4 Other MFPs: U.S. producer *'s output, by item and period**

Capacity and production in 1,000 pounds; capacity utilization ratio is in percent; interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Practical Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity Utilization	***	***	***	***	***

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

Figure F.2 Other MFPs: U.S. producer *'s output, by item and period**

* * * * *

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

Table F.5 Other MFPs: U.S. producer *'s output, by item and period**

Capacity and production in 1,000 pounds; Capacity utilization ratio is in percent; Interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Practical Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity Utilization	***	***	***	***	***

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

Figure F.3 Other MFPs: U.S. producer *'s output, by item and period**

* * * * *

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

Table F.6 Other MFPs: U.S. producer *'s output, by item and period**

Capacity and production in 1,000 pounds; Capacity utilization ratio is in percent; Interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Practical Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity Utilization	***	***	***	***	***

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

Figure F.4 Other MFPs: U.S. producer *'s output, by item and period**

* * * * *

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

Table F.7 Other MFPs: U.S. producer *'s output, by item and period**

Capacity and production in 1,000 pounds; Capacity utilization ratio is in percent; Interim period is January through March

Item	2022	2023	2024	Interim 2024	Interim 2025
Practical Capacity	***	***	***	***	***
Production	***	***	***	***	***
Capacity Utilization	***	***	***	***	***

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

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

Figure F.5 Other MFPs: U.S. producer **'s output, by item and period**

* * * * *

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

Table F.8 All MFPs: U.S. producers' output: Practical capacity, by firm and period

Capacity in 1,000 pounds; interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Dart	***	***	***	***	***
Fibreform	***	***	***	***	***
Genera	***	***	***	***	***
Hartmann	***	***	***	***	***
Huhtamaki	***	***	***	***	***
Kanbol	***	***	***	***	***
MFT-CKF	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F.8 (Continued) All MFPs: U.S. producers' output: Production, by firm and period

Production in 1,000 pounds; Interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Dart	***	***	***	***	***
Fibreform	***	***	***	***	***
Genera	***	***	***	***	***
Hartmann	***	***	***	***	***
Huhtamaki	***	***	***	***	***
Kanbol	***	***	***	***	***
MFT-CKF	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F.8 (Continued) All MFPs: U.S. producers' output: Capacity Utilization, by firm and period

Capacity utilization ratios in percent; Interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Dart	***	***	***	***	***
Fibreform	***	***	***	***	***
Genera	***	***	***	***	***
Hartmann	***	***	***	***	***
Huhtamaki	***	***	***	***	***
Kanbol	***	***	***	***	***
MFT-CKF	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F.8 (Continued) All MFPs: U.S. producers' output: Share of Production, by firm and period

Share of production in percent; Interim period is January through March

Firm	2022	2023	2024	Interim 2024	Interim 2025
Dart	***	***	***	***	***
Fibreform	***	***	***	***	***
Genera	***	***	***	***	***
Hartmann	***	***	***	***	***
Huhtamaki	***	***	***	***	***
Kanbol	***	***	***	***	***
MFT-CKF	***	***	***	***	***
Pactiv	***	***	***	***	***
Reynolds	***	***	***	***	***
Sabert	***	***	***	***	***
Tekni-Plex	***	***	***	***	***
Tellus	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

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

Figure F.6 All MFPs: U.S. producers' capacity, production, and capacity utilization, by period

* * * * *

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

Table F.9 Other MFPs: U.S. producer's total shipments, by destination and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound; shares in percent; interim period is January through March

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

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

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

Table F.10 All MFPs: All MFPs: U.S. producers' total shipments, by destination and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound; shares in percent; interim period is January through March

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

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

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

Table F.11 Other MFPs: U.S. producer's inventories and their ratio to select items, by period

Quantity in 1,000 pounds; ratios in percent; Interim period is January through March

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

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

Table F.12 All MFPs: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds; ratios in percent; Interim period is January through March

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

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

Table F.13 Other MFPs: U.S. producers' employment related information, by item and period

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

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

Table F.14 All MFPs: U.S. producers' employment related information, by item and period

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

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

Note: Total wages paid by *** were derived using reported industry average wages as their submitted questionnaire lacked wage data.

Table F.15 Other MFPs: U.S. imports, by source and period

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

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
All import sources	Quantity	78,515	77,200	68,890	6,500	5,230
All import sources	Value	57,132	64,632	60,186	6,080	6,856
All import sources	Unit value	0.73	0.84	0.87	0.94	1.31

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

Table F.16 All MFPs: U.S. imports, by source and period

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

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
All import sources	Quantity	365,904	342,150	375,982	81,145	84,654
All import sources	Value	492,979	406,932	441,437	93,965	107,624
All import sources	Unit value	1.35	1.19	1.17	1.16	1.27
All import sources	Ratio	***	***	***	***	***

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

Table F.17 Other MFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

Quantity in 1,000 pounds

Source	Round or Oval plate	Square or rectangular tray	Bowls	Clamshells	Lids
U.S. producers	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table F.17 (Continued) Other MFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

Quantity in 1,000 pounds

Source	Cup carriers	Portion cups	Other	All product forms
U.S. producers	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table F.17 (Continued) Other MFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

Share across in percent

Source	Round or Oval plate	Square or rectangular tray	Bowls	Clamshells	Lids
U.S. producers	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table F.17 (Continued) Other MFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

Share across in percent

Source	Cup carriers	Portion cups	Other	All product forms
U.S. producers	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table F.17 (Continued) Other MFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

Share down in percent

Source	Round or Oval plate	Square or rectangular tray	Bowls	Clamshells	Lids
U.S. producers	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	***

Table continued.

Table F.17 (Continued) Other MFPs: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

Share down in percent

Source	Cup carriers	Portion cups	Other	All product forms
U.S. producers	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	***	100.0	100.0

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

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

Figure F.7 All MFPS: U.S. producers' and U.S. importers' U.S. shipments in 2024, by source and product form

* * * * *

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

Table F.18 Other MFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	***
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	***
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	***

Table continued.

Table F.18 (Continued) Other MFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Share across in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product form	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product form	Share of value	***	***	***	***	100.0

Table continued.

Table F.18 (Continued) Other MFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Share down in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product form	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product form	Share of value	***	***	***	***	100.0

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

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

Table F.19 All MFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	***
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	***
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	***

Table continued.

Table F.19 (Continued) All MFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Share across in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	***
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	***

Table continued.

Table F.19 (Continued) All MFPs: U.S. producers' U.S. shipments in 2024, by product form and fiber appearance

Share down in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	100.0	100.0	100.0	100.0	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	100.0	100.0	100.0	100.0	100.0

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

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

Table F.20 Other MFPs: U.S. importers' U.S. shipments of imports from all import sources in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	68,577
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	64,122
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	0.9

Table continued.

Table F.20 (Continued) Other MFPs: U.S. importers' U.S. shipments of imports from all import sources in 2024, by product form and fiber appearance

Share across in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0

Table continued.

Table F.20 (Continued) Other MFPs: U.S. Importers' U.S. shipments from all import sources in 2024, by product form and fiber appearance

Share down in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	***	***	***	***	100.0

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

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

Table F.21 All MFPs: U.S. Importers' U.S. shipments from all import sources in 2024, by product form and fiber appearance

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Quantity	***	***	***	***	***
Square or rectangular trays	Quantity	***	***	***	***	***
Bowls	Quantity	***	***	***	***	***
Clamshells	Quantity	***	***	***	***	***
Lids	Quantity	***	***	***	***	***
Cup carriers	Quantity	***	***	***	***	***
Portion cups	Quantity	***	***	***	***	***
All other products	Quantity	***	***	***	***	***
All product forms	Quantity	***	***	***	***	360,479
Round or oval plates	Value	***	***	***	***	***
Square or rectangular trays	Value	***	***	***	***	***
Bowls	Value	***	***	***	***	***
Clamshells	Value	***	***	***	***	***
Lids	Value	***	***	***	***	***
Cup carriers	Value	***	***	***	***	***
Portion cups	Value	***	***	***	***	***
All other products	Value	***	***	***	***	***
All product forms	Value	***	***	***	***	619,323
Round or oval plates	Unit Value	***	***	***	***	***
Square or rectangular trays	Unit Value	***	***	***	***	***
Bowls	Unit Value	***	***	***	***	***
Clamshells	Unit Value	***	***	***	***	***
Lids	Unit Value	***	***	***	***	***
Cup carriers	Unit Value	***	***	***	***	***
Portion cups	Unit Value	***	***	***	***	***
All other products	Unit Value	***	***	***	***	***
All product forms	Unit Value	***	***	***	***	1.7

Table continued.

Table F.21 (Continued) All MFPs: U.S. Importers' U.S. shipments from all import sources in 2024, by product form and fiber appearance

Share across in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	100.0
Square or rectangular trays	Share of quantity	***	***	***	***	100.0
Bowls	Share of quantity	***	***	***	***	100.0
Clamshells	Share of quantity	***	***	***	***	100.0
Lids	Share of quantity	***	***	***	***	100.0
Cup carriers	Share of quantity	***	***	***	***	100.0
Portion cups	Share of quantity	***	***	***	***	100.0
All other products	Share of quantity	***	***	***	***	100.0
All product forms	Share of quantity	***	***	***	***	100.0
Round or oval plates	Share of value	***	***	***	***	100.0
Square or rectangular trays	Share of value	***	***	***	***	100.0
Bowls	Share of value	***	***	***	***	100.0
Clamshells	Share of value	***	***	***	***	100.0
Lids	Share of value	***	***	***	***	100.0
Cup carriers	Share of value	***	***	***	***	100.0
Portion cups	Share of value	***	***	***	***	100.0
All other products	Share of value	***	***	***	***	100.0
All product forms	Share of value	***	***	***	***	100.0

Table continued.

Table F.21 (Continued) All MFPs: U.S. Importers' U.S. shipments from all import sources in 2024, by product form and fiber appearance

Share down in percent

Product form	Measure	Plain bleached	Plain natural	All plain	Other than plain	All fiber appearances
Round or oval plates	Share of quantity	***	***	***	***	***
Square or rectangular trays	Share of quantity	***	***	***	***	***
Bowls	Share of quantity	***	***	***	***	***
Clamshells	Share of quantity	***	***	***	***	***
Lids	Share of quantity	***	***	***	***	***
Cup carriers	Share of quantity	***	***	***	***	***
Portion cups	Share of quantity	***	***	***	***	***
All other products	Share of quantity	***	***	***	***	***
All product forms	Share of quantity	100.0	100.0	100.0	100.0	100.0
Round or oval plates	Share of value	***	***	***	***	***
Square or rectangular trays	Share of value	***	***	***	***	***
Bowls	Share of value	***	***	***	***	***
Clamshells	Share of value	***	***	***	***	***
Lids	Share of value	***	***	***	***	***
Cup carriers	Share of value	***	***	***	***	***
Portion cups	Share of value	***	***	***	***	***
All other products	Share of value	***	***	***	***	***
All product forms	Share of value	100.0	100.0	100.0	100.0	100.0

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

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

Figure F.8 All MFPS: U.S. producers' and U.S. Importers' U.S. shipments in 2024, by firm type, source and fiber appearance

* * * * *

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

Table F.22 All MFPs: Apparent U.S. consumption and market shares based on quantity data, by source and period

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

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
TMFPs: U.S. producers	Quantity	***	***	***	***	***
Other MFPs: U.S. producers	Quantity	***	***	***	***	***
All MFPs: U.S. producers	Quantity	***	***	***	***	***
TMFPs: China	Quantity	215,983	205,691	237,153	55,522	39,922
TMFPs: Vietnam	Quantity	7,832	19,876	21,921	5,924	11,467
TMFPs: Subject sources	Quantity	223,815	225,567	259,074	61,446	51,389
TMFPs: Nonsubject sources	Quantity	32,502	37,997	32,827	9,353	12,608
TMFPs: All import sources	Quantity	256,317	263,564	291,901	70,799	63,997
Other MFPs: All import sources	Quantity	78,181	77,207	68,577	6,500	5,315
All MFPs: All import sources	Quantity	334,498	340,771	360,478	77,299	69,312
All MFPs: All sources	Quantity	***	***	***	***	***
TMFPs: U.S. producers	Share	***	***	***	***	***
Other MFPs: U.S. producers	Share	***	***	***	***	***
All MFPs: U.S. producers	Share	***	***	***	***	***
TMFPs: China	Share	***	***	***	***	***
TMFPs: Vietnam	Share	***	***	***	***	***
TMFPs: Subject sources	Share	***	***	***	***	***
TMFPs: Nonsubject sources	Share	***	***	***	***	***
TMFPs: All import sources	Share	***	***	***	***	***
Other MFPs: All import sources	Share	***	***	***	***	***
All MFPs: All import sources	Share	***	***	***	***	***
All MFPs: All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

Figure F.9 All MFPS: Apparent U.S. consumption and market shares based on quantity data, by source and period

* * * * *

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

Table F.23 All MFPs: Apparent U.S. consumption and market shares based on value data, by source and period

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

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
TMFPs: U.S. producers	Value	***	***	***	***	***
Other MFPs: U.S. producers	Value	***	***	***	***	***
All MFPs: U.S. producers	Value	***	***	***	***	***
TMFPs: China	Value	530,400	466,322	477,959	110,127	86,836
TMFPs: Vietnam	Value	14,580	29,467	32,786	7,956	16,659
TMFPs: Subject sources	Value	544,980	495,789	510,745	118,083	103,495
TMFPs: Nonsubject sources	Value	55,811	60,019	44,454	12,738	24,237
TMFPs: All import sources	Value	600,791	555,808	555,199	130,821	127,732
Other MFPs: All import sources	Value	63,886	69,778	64,122	6,998	7,516
All MFPs: All import sources	Value	664,677	625,586	619,321	137,819	135,248
All MFPs: All sources	Value	***	***	***	***	***
TMFPs: U.S. producers	Share	***	***	***	***	***
Other MFPs: U.S. producers	Share	***	***	***	***	***
All MFPs: U.S. producers	Share	***	***	***	***	***
TMFPs: China	Share	***	***	***	***	***
TMFPs: Vietnam	Share	***	***	***	***	***
TMFPs: Subject sources	Share	***	***	***	***	***
TMFPs: Nonsubject sources	Share	***	***	***	***	***
TMFPs: All import sources	Share	***	***	***	***	***
Other MFPs: All import sources	Share	***	***	***	***	***
All MFPs: All import sources	Share	***	***	***	***	***
All MFPs: All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Figure F.10 All MFPs: Apparent U.S. consumption and market shares based on value data, by source and period

* * * * *

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

Table F.24 All MFPs: Share of U.S. shipments by source, channel of distribution, and period

Share in percent; interim period is January through March

Product type and source	Packaging type and channel	2022	2023	2024	Interim 2024	Interim 2025
TMFPs: United States	Packaged for retail: to Distributors	***	***	***	***	***
TMFPs: United States	Packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: United States	Not packaged for retail: to Distributors	***	***	***	***	***
TMFPs: United States	Not packaged for retail: to Retailers/end users	***	***	***	***	***
Other MFPs: United States	Packaged for retail: to Distributors	***	***	***	***	***
Other MFPs: United States	Packaged for retail: to Retailers/end users	***	***	***	***	***
Other MFPs: United States	Not packaged for retail: to Distributors	***	***	***	***	***
Other MFPs: United States	Not packaged for retail: to Retailers/end users	***	***	***	***	***
All MFPs: United States	Packaged for retail: to Distributors	***	***	***	***	***
All MFPs: United States	Packaged for retail: to Retailers/end users	***	***	***	***	***
All MFPs: United States	Not packaged for retail: to Distributors	***	***	***	***	***
All MFPs: United States	Not packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: China	Packaged for retail: to Distributors	***	***	***	***	***
TMFPs: China	Packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: China	Not packaged for retail: to Distributors	***	***	***	***	***
TMFPs: China	Not packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: Vietnam	Packaged for retail: to Distributors	***	***	***	***	***
TMFPs: Vietnam	Packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: Vietnam	Not packaged for retail: to Distributors	***	***	***	***	***
TMFPs: Vietnam	Not packaged for retail: to Retailers/end users	***	***	***	***	***

Table continued.

Table F.24 (Continued) All MFPs: Share of U.S. shipments by source, channel of distribution, and period

Share in percent; interim period is January through March

Product type and source	Packaging type and channel	2022	2023	2024	Interim 2024	Interim 2025
TMFPs: Subject sources	Packaged for retail: to Distributors	***	***	***	***	***
TMFPs: Subject sources	Packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: Subject sources	Not packaged for retail: to Distributors	***	***	***	***	***
TMFPs: Subject sources	Not packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: Nonsubject sources	Packaged for retail: to Distributors	***	***	***	***	***
TMFPs: Nonsubject sources	Packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: Nonsubject sources	Not packaged for retail: to Distributors	***	***	***	***	***
TMFPs: Nonsubject sources	Not packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: All import sources	Packaged for retail: to Distributors	***	***	***	***	***
TMFPs: All import sources	Packaged for retail: to Retailers/end users	***	***	***	***	***
TMFPs: All import sources	Not packaged for retail: to Distributors	***	***	***	***	***
TMFPs: All import sources	Not packaged for retail: to Retailers/end users	***	***	***	***	***
Other MFPs: All import sources	Packaged for retail: to Distributors	***	***	***	***	***
Other MFPs: All import sources	Packaged for retail: to Retailers/end users	***	***	***	***	***
Other MFPs: All import sources	Not packaged for retail: to Distributors	***	***	***	***	***
Other MFPs: All import sources	Not packaged for retail: to Retailers/end users	***	***	***	***	***
All MFPs: All import sources	Packaged for retail: to Distributors	***	***	***	***	***
All MFPs: All import sources	Packaged for retail: to Retailers/end users	***	***	***	***	***
All MFPs: All import sources	Not packaged for retail: to Distributors	***	***	***	***	***
All MFPs: All import sources	Not packaged for retail: to Retailers/end users	***	***	***	***	***

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

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

Table F.25 Other MFPs: U.S. producers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through March

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

Table continued.

Table F.25 (Continued) Other MFPs: U.S. producers' results of operations, by item and period

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

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs	Share	***	***	***	***	***
COGS: Direct labor costs	Share	***	***	***	***	***
COGS: Other factory costs	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

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

Table F.26 Other MFPs: Changes in AUVs between comparison periods

Changes in percent; interim period is January through March

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▼***	▼***	▲***	▲***
COGS: Raw material costs	▼***	▼***	▼***	▼***
COGS: Direct labor costs	▼***	▼***	▲***	▼***
COGS: Other factory costs	▼***	▲***	▼***	▲***
COGS: Total	▼***	▼***	▼***	▲***

Table continued.

Table F.26 (Continued) Other MFPs: Changes in AUVs between comparison periods

Changes in dollars per pound; interim period is January through March

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

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

Note: Changes in percentages and unit values shown as “0.0” or “0” represent values greater than zero, but less than “0.05” or “0.5,” respectively. Zeroes, no changes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table F.27 All MFPs: U.S. producers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through March

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

Table continued.

Table F.27 (Continued) All MFPs: U.S. producers' results of operations, by item and period

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

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs	Share	***	***	***	***	***
COGS: Direct labor costs	Share	***	***	***	***	***
COGS: Other factory costs	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

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

Table F.28 All MFPs: Changes in AUVs between comparison periods

Changes in percent; interim period is January through March

Item	2022–24	2022–23	2023–24	Interim 2024–25
Total net sales	▼ ***	▼ ***	▼ ***	▲ ***
COGS: Raw material costs	▼ ***	▼ ***	▼ ***	▼ ***
COGS: Direct labor costs	▲ ***	▲ ***	▲ ***	▼ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▲ ***

Table continued.

Table F.28 (Continued) All MFPs: Changes in AUVs between comparison periods

Changes in dollars per pound; interim period is January through March

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

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

Note: Changes in percentages and unit values shown as “0.0” or “0” represent values greater than zero, but less than “0.05” or “0.5,” respectively. Zeroes, no changes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

