

**SULFANILIC ACID: PROBABLE
ECONOMIC EFFECT OF
REMOVAL FROM THE LIST
OF ELIGIBLE ARTICLES
UNDER THE U.S.
GENERALIZED SYSTEM
OF PREFERENCES**

**Report to the President on
Investigation No. 332-330**

USITC PUBLICATION 2562

OCTOBER 1992

**United States International Trade Commission
Washington, DC 20436**



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Note.--This report is a declassified
version of the confidential probable
effect advice report submitted to
the President on October 9, 1992

INTRODUCTION

The Commission instituted this investigation following receipt on August 5, 1992, of a request from the United States Trade Representative (USTR) (appendix A) for an investigation under section 332(g) of the Tariff Act of 1930 (19 U.S.C. 1332(g)), in order that it might provide advice to the USTR--

as to the probable economic effect on U.S. industries producing like or directly competitive articles and on consumers of the removal of sulfanilic acid, provided for in subheading 2921.42.24 of the Harmonized Tariff Schedule, from eligibility for duty-free treatment under the Generalized System of Preferences (GSP).

The USTR requested this investigation and advice following acceptance by the Trade Policy Staff Committee (TPSC) of a petition from R-M Industries, Inc., for expedited removal of sulfanilic acid from GSP. The Commission instituted the investigation, No. 332-330, on August 20, 1992. The Commission notice of investigation is contained in appendix B.¹ Interested parties were afforded an opportunity to submit written statements.

¹ The USTR and the Commission issued the following Federal Register notices relating to investigation No. 332-330:

<u>Date</u>	<u>Notice</u>	<u>Subject</u>
August 12, 1992	57 F.R. 36123	USTR Notice of GSP Review
August 26, 1992	57 F.R. 38696	Notice of ITC Investigation

PRESENTATION OF PROBABLE ECONOMIC EFFECT ADVICE

This report is similar in format to Commission reports requested by USTR in connection with the annual review of proposed changes to the President's list of GSP-eligible articles. The requested information and advice are presented in a "commodity digest" that contains the following sections:

I. Introduction.--This section provides basic information on the item, including description and uses, rate of duty, and an indication of whether there was U.S. production of the item on January 3, 1985.

II. U.S. market profile.--This section provides information on U.S. producers, employment, shipments, exports, imports, consumption, import market share, and capacity utilization. Where exact information is not obtainable, the best available estimates are provided.

III. GSP import situation, 1991.--This section provides 1991 U.S. import data, including the world total and certain GSP country-specific data. Individual GSP country data are provided for the top two GSP suppliers during 1991.

IV. Competitiveness profiles, GSP suppliers.--This section provides background information on GSP supplier countries that are (1) the most significant sources, (2) likely to emerge as significant suppliers as a result of the GSP modification, and/or (3) affected by changes in eligibility as a result of the modification. Information is provided on the level and significance of the country as a supplier, the elasticities of supply and demand for imports from the country,² and the price and quality of imports compared with U.S. and other foreign products.

² Price elasticity is a measure of the changes in quantity that are brought about as a result of changes in price. The guidelines used for both supply and demand are as follows: The elasticity is low when the percentage change in quantity is less than the percentage change in price; moderate when it is between one and two times the percentage change in price; and, high when it is greater than two times the percentage change in price. It should be noted that the elasticity levels ("low, moderate, and high") are only estimates, and are not based on empirical research on the various products under consideration.

V. Position of interested parties.--This section provides brief summaries of written submissions from interested parties.

VI. Summary of probable economic effects.--This section provides advice on the short-to-near-term (1-5 years, 1993-97) impact of the proposed GSP-eligibility modifications in three areas: (1) U.S. imports, (2) U.S. industry, and (3) U.S. consumers. The probable economic effect advice, to a degree, integrates and summarizes the data provided in sections I-V of the digests with particular emphasis on the price sensitivity of import supply and demand. Thus, for example, if the price elasticity of demand in the United States and the price elasticity of supply in the exporting beneficiary country are both relatively high, elimination of even a moderate-level tariff suggests the possibility of large import increases from the beneficiary country.

It should be noted that the probable economic effect advice with respect to changes in import levels is presented in terms of the degree to which GSP modifications will affect U.S. trade levels with the world. Consequently, although U.S. imports of a particular product from GSP beneficiaries may change significantly, if GSP beneficiaries supply a very small share of total U.S. imports of that product or if imports from beneficiaries readily substitute for imports from developed countries, the overall effect on U.S. imports could be minimal.

The digest contains a coded summary of the probable economic effect advice. The coding scheme is shown as follows:

Level of total U.S. imports:

- Code X: Little or no decrease (0 to 5 percent).
- Code Y: Moderate decrease (6 to 15 percent).
- Code Z: Significant decrease (over 15 percent).
- Code N: No impact.

Impact on the U.S. industry and employment:

- Code X: Little or negligible beneficial impact.
- Code Y: Significant beneficial impact (significant number of additional workers employed; increases in output; increases in profit levels; new firms; but beneficial impact not industry wide).
- Code Z: Substantial beneficial impact (substantial increase in employment; widespread increased production; substantial increases in profit levels; beneficial impact on the industry as a whole).
- Code N: No impact.

Impact on the U.S. consumer:³

- Code X: The bulk of the duty increase (greater than 75 percent) is expected to be absorbed by the foreign suppliers.

³ The "U.S. consumer" may be a firm/person receiving an intermediate good for further processing or an end user in the case of a final good.

- Code Y: The duty increase is expected to increase costs to both the foreign suppliers and the domestic consumer (neither absorbing more than 75 percent of the cost).
- Code Z: The bulk of the duty increase (greater than 75 percent) is expected to be passed on to the U.S. consumer.
- Code N: None.

Further, confidence in available data and data estimates often varies by product and by type of information. To give the report user some indication of the degree of confidence in data provided in the digests, the Commission uses the following coding system:

- No code = Response based on complete or almost complete information/data adequate for a high degree of confidence.
- * = Based on partial information/data adequate for estimation with a moderately high degree of confidence (e.g., *5, *X).
- ** = Based on limited information/data adequate for estimation with a moderate degree of confidence (e.g., **5).
- (¹) = Not available.

The probable economic effect advice for U.S. imports and the domestic industry are estimates of what is expected in the future with the proposed change in GSP eligibility compared with what is expected without it. That is, the estimated effects are independent of and in addition to any changes that will otherwise occur. Although a number of factors, such as exchange rate changes, relative inflation rates, and relative rates of economic growth could have a significant effect on imports, these other factors are not within the scope of the USTR request.

COMMODITY DIGEST

SULFANILIC ACID

I. Introduction

HTS subheading	Short description	Col. 1 rate of duty (1/1/92) Percent ad valorem	Like or directly competitive article produced in the United States on Jan. 3, 1985?
2921.42.2420	Sulfanilic acid	20.3% (AVE)	Yes

Description and uses.--Sulfanilic acid is a grey-white crystalline product used in the production of synthetic dyes and optical brightening agents, and as an additive to concrete to reduce the amount of water required for curing. The use of sulfanilic acid provides a unique portion of the molecular structure of the end-use products, and from such a standpoint, no substitutes exist. The chemical does not make up a substantial part of the end-use products in terms of value, however. Several grades of purity exist for sulfanilic acid. For example, "Reagent Grade" is considered the highest grade, followed by "refined" grade, and "crude" grade. With the exception of "Reagent Grade" specified by the American Chemical Society, there is no universally defined standard of purity. Most facilities produce a "refined" grade although some produce a "crude" grade. Dyes and brightening agents uses typically demand high-purity and quality product, while concrete additives may use lower-quality material.

II. U.S. market profile

Profile of U.S. industry and market, 1987-91

Item	1987	1988	1989	1990	1991
Producers (number)	2	2	2	2	2
Employment (number)	(1)	(1)	***	***	***
Shipments ² (1,000 dollars)	(1)	(1)	***	***	***
Exports ³ (1,000 dollars)	***	***	***	***	***
Imports (1,000 dollars)	(1)	(1)	***	***	***
Consumption (1,000 dollars)	(1)	(1)	***	***	***
Import-to-consumption ratio (percent)	(4)	(4)	***	***	***
Capacity utilization (percent)	(1)	(1)	***	***	***

¹ Data for 1987-88 are not available. Data for 1989-91 are compiled from responses to questionnaires of the U.S. International Trade Commission related to investigation Nos. 701-TA-318, 731-TA-538, 731-TA-560, and 731-TA-561.

² The bulk of domestic and export product shipments referred to in this commodity digest is in the form of the sodium salt of sulfanilic acid. The Commission determined that the sodium salt was a "like" product compared with sulfanilic acid in investigation Nos. 701-TA-318, 731-TA-538, 731-TA-560, and 731-TA-561. For purposes of this special GSP review, the sodium salt of sulfanilic acid is considered to be a "like or directly competitive" product.

³ Export data for sodium sulfanilate were supplied to the Commission by R-M Industries, Inc., the sole U.S. exporter of this product, in a submission dated September 8, 1992.

⁴ Not available.

Comment.--The U.S. producers have sufficient facilities and production capacity to meet the needs of the U.S. market, and have developed channels of distribution. Most purchasers of sulfanilic acid are more concerned with quality and purity than price. Some imported product, while lower in price than the U.S. product, is somewhat lower in quality within any given grade. Pricing is competitive within the respective end-use categories for concrete additives, and dyes and optical brightening agents.

In 1991, exports ***.

The U.S. producers have produced the subject chemical since at least 1984, providing the U.S. market with high-quality product to be used ultimately in the production of optical brighteners and synthetic dyes. R-M Industries ceased production of refined sulfanilic acid in 1989, and currently manufactures and sells the "like" product sodium sulfanilate. ***. Many U.S. consumers of sulfanilic acid have supplemented their needs by sourcing material from overseas. It is likely that import channels of distribution are nearly as well developed as those for domestic producers. However, importers tend to concentrate their sales efforts for different grades of material that have different end-use applications. Low-purity or technical grade sulfanilic acid is not generally substitutable for higher grade material. There is, however, a higher degree of substitutability between refined sulfanilic acid and sodium sulfanilate. While most purchasers indicate a current preference for either refined sulfanilic acid or sodium sulfanilate, purchasers can and have switched between them.

Certain countries are associated with the differing grades of material because of the specific manufacturing processes; thus, India is typically associated with lower grade sulfanilic acid, while Hungary is associated with top-grade material in demand for optical brighteners and dye uses. Pricing differences also exist between grades of material. Current (1992) prices for sulfanilic acid, based on unit value of Customs valuation, range from \$1.72 to \$2.07 per kilogram for Hungarian product, and \$1.54 per kilogram for product from India. In contrast, the current domestic price for sulfanilic acid is about \$2.10 per kilogram in bulk. Other costs related to importation or transportation may affect the overall price for imported sulfanilic acid.

Demand conditions for the subject chemical and the "like" product are affected by changes in U.S. economic activity. For example, the current decline in the housing and construction industries has, in turn, led to some reduced demand for concrete structures that would use additives derived from technical sulfanilic acid. The demand for sulfanilic acid used in producing optical brighteners and synthetic dyes, however, is less affected by the overall performance of the economy, and, therefore, this segment of the market accounted for the largest portion in the growth of consumption of refined sulfanilic acid and sodium sulfanilate over 1989-91.

III. GSP import situation, 1991

U.S. imports and share of U.S. consumption, 1991¹

Item	Imports 1,000 dollars	Percent of total imports	Percent of GSP imports	Percent of U.S. consumption
Total	***	***	***	***
Imports from GSP countries:				
Total	***	***	***	***
Hungary	***	***	***	***
India	***	***	***	***

¹ Data are compiled from responses to questionnaires of the U.S. International Trade Commission related to investigation Nos. 701-TA-318, 731-TA-538, 731-TA-560, and 731-TA-561.

Comment.—On July 1, 1991, when GSP eligibility for sulfanilic acid was established, India and Hungary were the only two GSP suppliers. Other non-GSP suppliers during 1991 were China and Japan; China supplied most of the non-GSP imports. Hungary first entered the U.S. market in 1990. In 1992, GSP eligibility for India was removed for sulfanilic acid, pursuant to section 504(a)(1) of the Trade Act of 1974, and in consideration of factors concerning the adequate and effective protection of intellectual property rights set forth in 501 and 502(c) of the act.

Recent antidumping and countervailing duty investigations¹

Sulfanilic acid has been and continues to be the subject of several investigations under the U.S. antidumping and countervailing duty laws (19 U.S.C. 1671 et seq.). Sulfanilic acid from China was recently made the subject of an antidumping order, and sulfanilic acid from India and Hungary is the subject of pending countervailing duty and antidumping investigations (imports from Hungary are the subject of an antidumping investigation only).

Imports from China. On October 3, 1991, R-M Industries, Inc., Fort Mill, SC, filed a petition under the antidumping law with the Commission and the U.S. Department of Commerce alleging that an industry in the United States is being materially injured, and is threatened with further material injury, by reason of imports from the People's Republic of China of sulfanilic acid that is being sold in the United States at less than fair value (LTFV). The Commission instituted a preliminary injury investigation and in late November 1991 made an affirmative preliminary injury determination (Inv. No. 731-TA-538 (Preliminary), USITC Pub. 2457), finding that there is a "reasonable indication" that an industry in the United States is materially injured or threatened with material injury by reason of such imports.

Following receipt of notice from Commerce in May 1992 that it had found that imports of sulfanilic acid from China are being, or are likely to be, sold in the United States at LTFV, the Commission instituted a final injury investigation, No. 731-TA-538 (Final). As a result of that investigation, the Commission in August 1992 determined that an industry in the United States is threatened with material injury by reason of imports from the People's Republic of China of sulfanilic acid that have been found by the Department of Commerce to be sold in the United States at LTFV (USITC Pub. 2542). The Commission further determined that it would not have found material injury but for the suspension of liquidation of entries of the merchandise under investigation. Commerce subsequently issued an antidumping order, notice of which was published in the Federal Register of August 19, 1992 (57 F.R. 37524). In September 1992, counsel for the importers/producers of the Chinese product filed a notice of appeal with the U.S. Court of International Trade with respect to the Commission's final determination.

Imports from India and Hungary. On May 8, 1992, R-M Industries filed a petition with the Commission and the Department of Commerce under the U.S. antidumping and countervailing laws alleging that an industry in the United States is being materially injured or threatened with material injury by reason of imports from Hungary and India of sulfanilic acid that are alleged to be subsidized by the Government of India and, in the case of both India and Hungary, to be sold in the United States at LTFV. Accordingly, the Commission instituted three preliminary injury investigations (Inv. Nos. 701-TA-318 (Preliminary) and 731-TA-560 and 561 (Preliminary)). In June 1992, the Commission made affirmative determinations in all three investigations, finding that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of sulfanilic acid from the Republic of Hungary and India allegedly sold at LTFV and by reason of allegedly subsidized imports from India (USITC Pub. 2526). On August 11, 1992, the Department of Commerce made a preliminary affirmative countervailing duty determination pertaining to sulfanilic acid from India (57 Fed. Reg. 35784). Commerce must issue final antidumping and countervailing duty determinations in these investigations not later than December 29, 1992.

¹ Commissioner Brunsdale did not participate in the investigation on sulfanilic acid from China.

IV. Competitiveness profiles, 1991 GSP eligible suppliers

Competitiveness indicators for Hungary for all digest products

Ranking as a U.S. import supplier, 1991. 2

Price elasticity:

Can the U.S. purchaser easily shift among this and other suppliers? Yes X No

What is the price elasticity of U.S. demand? High Moderate X Low

Can production in the country be easily expanded or contracted
in the short term? Yes X No

Does the country have significant export markets besides the
United States? Yes X No

Could exports from the country be readily redistributed among
its foreign export markets? Yes X No

What is the price elasticity of import supply? High Moderate X Low

Price level compared with--

U.S. products. Above Equivalent X Below

Other foreign products Above X Equivalent Below

Quality compared with--

U.S. products. Above X Equivalent Below

Other foreign products Above X Equivalent Below

Comment.--Hungary is a supplier of refined sulfanilic acid destined for uses as optical brighteners and synthetic dyes. Hungarian prices are generally higher than prices for other GSP imported product. Whether purchasers of Hungarian material shift to other suppliers may depend on price. Prior to the imposition of antidumping duties on sulfanilic acid from China, purchasers did shift portions of their purchases from Hungarian to Chinese suppliers. Also, depending on purchasers' manufacturing processes, they may prefer refined sulfanilic acid over sodium sulfanilate, or vice versa. Some purchasers, however, have switched from one form to another, or used both, in recent years.

Competitiveness indicators for India for all digest products

GSP eligibility for imports of sulfanilic acid from India was removed in 1992. Therefore, although removal of GSP treatment for India is not considered in this commodity digest, the following competitiveness profile for India is included to provide complete information on all suppliers of U.S. imports of sulfanilic acid that were eligible for GSP during 1991.

Ranking as a U.S. import supplier, 1991. 3

Price elasticity:

Can the U.S. purchaser easily shift among this and other suppliers? Yes X No

What is the price elasticity of U.S. demand? High Moderate X Low

Can production in the country be easily expanded or contracted
in the short term? Yes X No

Does the country have significant export markets besides the
United States? Yes X No

Could exports from the country be readily redistributed among
its foreign export markets? Yes X No

What is the price elasticity of import supply? High X Moderate Low

Price level compared with--

U.S. products. Above Equivalent Below X

Other foreign products Above Equivalent Below X

Quality compared with--

U.S. products. Above Equivalent Below X

Other foreign products Above Equivalent Below X

Comment.--India supplies a lower quality product than Hungary or U.S. producers. The principal end-use market for Indian product is in the manufacture of additives for concrete. The Indian product and the Hungarian product do not generally compete for end uses. Based on data from the Bureau of the Census, unit values based on Customs valuation for India are lower than those for Hungary, ranging from 18 to 53 cents per kilogram.

Competitiveness indicators for all 1991 GSP eligible countries and for all digest products

Price elasticity:

Can the U.S. purchaser easily shift among this and other suppliers? Yes X No

What is the price elasticity of U.S. demand? High Moderate X Low

Can production in the country be easily expanded or contracted
in the short term? Yes X No

Does the country have significant export markets besides the
United States? Yes X No

Could exports from the country be readily redistributed among
its foreign export markets? Yes X No

What is the price elasticity of import supply? High Moderate X Low

Price level compared with—

U.S. products. Above Equivalent X Below

Other foreign products Above Equivalent X Below

Quality compared with—

U.S. products. Above Equivalent X Below

Other foreign products Above Equivalent X Below

V. Position of interested parties

Petitioner.—The petitioner, R-M industries, Inc., Fort Mill, SC, has stated that since GSP status was granted for sulfanilic acid in July 1991, the domestic industry has been injured, and there is a threat of continued injury resulting from these imports.

Opposition.—A statement of opposition was submitted on behalf of the U.S. importer Nitrokemia Ipartelepek, and its Hungarian supplier Nitrochem Co. Ltd. These firms have stated that U.S. imports of Hungarian sulfanilic acid into the U.S. have had no adverse impact on the U.S. industry, and that imposition of duties will result in artificial price increases to the U.S. consumer.

VI. Summary of probable economic effects—Removal

* * * * *

APPENDIX A

UNITED STATES TRADE REPRESENTATIVE'S REQUEST, RECEIVED
AUGUST 5, 1992, FOR PROBABLE ECONOMIC EFFECT ADVICE

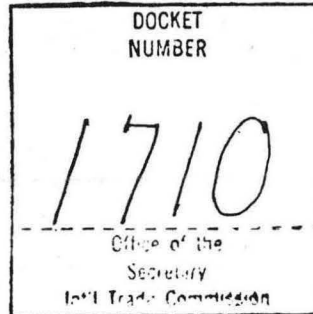
Rec'd in Chairman's Office 8/5/74

cc: The Commission

Dr. of Operations

TO: Dockets.

THE UNITED STATES TRADE REPRESENTATIVE
Executive Office of the President
Washington, D.C. 20506



The Honorable Don E. Newquist
Chairman
United States International
Trade Commission
500 E Street, S.W.
Washington, D.C. 20436

92 AUG -5 AM 10:06

RECEIVED
U.S. DEPT. OF COMMERCE
OFFICE OF THE SECRETARY
WASHINGTON

Dear Chairman Newquist:

The Trade Policy Staff Committee (TPSC) has accepted a petition for the expedited removal of sulfanilic acid that is provided for in subheading 2921.42.24 of the Harmonized Tariff Schedule of the United States (HTS) from the Generalized System of Preferences (GSP). In this connection, under authority delegated by the President, I request, pursuant to section 332(g) of the Tariff Act of 1930, that the Commission provide its advice as to the probable economic effect on United States industries producing like or directly competitive articles and on consumers of the removal of sulfanilic acid provided for in HTS subheading 2921.42.24 from eligibility for duty-free treatment under the GSP.

The TPSC has granted a request from R-M Industries, Inc. to conduct the review of this petition on an expedited basis. The Commission is therefore requested to consider the case on an expedited basis and to endeavor to provide its advice 60 days after receipt of this letter. In view of this compressed time, we do not expect the Commission to hold a public hearing on this case.

I direct you to mark as "Confidential" those portions of the Commission's report and related working papers that contain the Commission's advice on the probable economic effect on United States industries producing like or directly competitive articles and on consumers. All other parts of the report are unclassified, but the overall classification marked on the front and back covers of the report should be "Confidential" to conform with the confidential sections contained therein. All business confidential information contained in the report should be clearly identified.

When the Commission's confidential report is provided to my Office, the Commission should issue a public version of the

The Honorable Don E. Newquist
Page Two

report, as soon as possible thereafter, that contains only the unclassified sections, with any business confidential information deleted.

The Commission's assistance in this matter is greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carla A. Hills", written in dark ink. The signature is fluid and stylized, with a long horizontal stroke at the end.

Carla A. Hills

APPENDIX B

U.S. INTERNATIONAL TRADE COMMISSION NOTICE OF
INVESTIGATION

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

(Inv. No. 332-330)

SULFANILIC ACID: PROBABLE ECONOMIC EFFECT OF REMOVAL FROM THE LIST
OF ELIGIBLE ARTICLES UNDER THE U.S. GENERALIZED SYSTEM OF PREFERENCES

AGENCY: United States International Trade Commission

ACTION: Institution of investigation.

Summary: Following receipt of a request on August 5, 1992, from the United States Trade Representative (USTR) under section 332(g) of the Tariff Act of 1930 (19 U.S.C. 1332(g)), the Commission instituted investigation No. 332-330 in order that it might provide advice as to the probable economic effect on U.S. industries producing like or directly competitive articles and on consumers of the removal of sulfanilic acid, provided for in subheading 2921.42.24 of the Harmonized Tariff Schedule, from eligibility for duty-free treatment under the Generalized System of Preferences (GSP).

In her letter the USTR said that the request was made following acceptance by the Trade Policy Staff Committee (TPSC) of a petition from R-M Industries, Inc., for expedited removal of sulfanilic acid from GSP.

As requested by USTR, the Commission will seek to provide its advice not later than October 5, 1992.

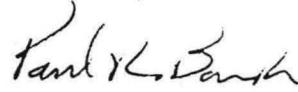
EFFECTIVE DATE: August 20, 1992

FOR FURTHER INFORMATION CONTACT: With respect to information on the designated product, Mr. David Michels of the Commission's Office of Industries (202-205-3352); and for information on legal aspects of the investigation, Mr. William Gearhart of the Commission's Office of the General Counsel (202-205-3091).

WRITTEN SUBMISSIONS: Interested persons are invited to submit written statements concerning the matters to be addressed in the investigation. Commercial or financial information that a party desires the Commission to treat as confidential must conform with the requirements of § 201.6 of the Commission's Rules of Practice and Procedure (19 CFR 201.6)--that is, it must be submitted on separate sheets of paper, each clearly marked "Confidential Business Information" at the top. (Generally, submission of separate confidential and public versions of the submission would be appropriate.) All written submissions, except for confidential business information, will be made available in the Office of the Secretary to the Commission for inspection by interested persons. To be assured of consideration by the Commission, written statements should be submitted to the Commission at the earliest practical date and should be received no later than September 9, 1992. All submissions should be addressed to the Secretary to the Commission at the Commission's office in Washington, D.C.

Hearing-impaired individuals are advised that information on this matter can be obtained by contacting our TDD terminal on 202-205-1810.

By order of the Commission.

A handwritten signature in dark ink, appearing to read "Paul R. Bardos".

Paul R. Bardos
Acting Secretary

Issued: August 20, 1992

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INTERNATIONAL TRADE COMMISSION

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