Raw Honey from Argentina, Brazil, India, and Vietnam

Investigation Nos. 731-TA-1560-1562 and 1564 (Final)

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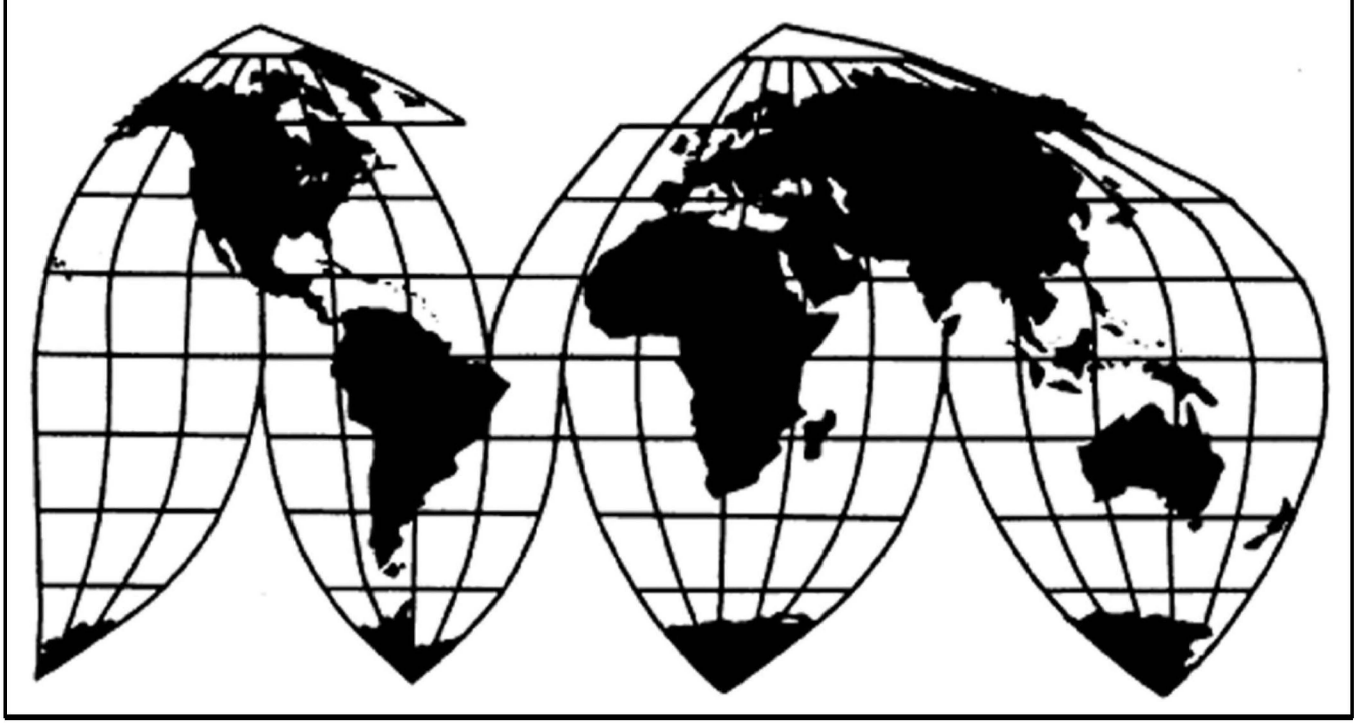
U.S. International Trade Commission



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Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets in confidential reports and is deleted and replaced with asterisks (***) in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-1560-1562 and 1564 (Final)

Raw Honey from Argentina, Brazil, India, and Vietnam

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that an industry in the United States is materially injured by reason of imports of raw honey from Argentina, Brazil, India, and Vietnam, provided for in subheading 0409.00.00 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").[2] [3]

BACKGROUND

The Commission instituted these investigations effective April 21, 2021, following receipt of petitions filed with the Commission and Commerce by the American Honey Producers Association ("AHPA"), Bruce, South Dakota, and the Sioux Honey Association ("SHA"), Sioux City, Iowa. The Commission scheduled the final phase of the investigations following notification of preliminary determinations by Commerce that imports of raw honey from Argentina, Brazil, India, Ukraine, and Vietnam were being sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)).[4] Notice of the scheduling of the final phase of

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

[2] 87 FR 22179, 87 FR 22182, 87 FR 22188, 87 FR 22184 (April 14, 2022).

[3] The Commission also finds that imports subject to Commerce's affirmative critical circumstances determination are not likely to undermine seriously the remedial effect of the antidumping duty order on Argentina. The Commission finds that imports subject to Commerce's affirmative critical circumstances determination are likely to undermine seriously the remedial effect of the antidumping duty order on Vietnam.

[4] On March 24, 2022, counsel for petitioners filed with Commerce and the Commission a withdrawal of their petition regarding imports of raw honey from Ukraine. Accordingly, the antidumping duty investigation concerning raw honey from Ukraine (Investigation No. 731-TA-1563 (Final)) was terminated. 87 FR 19855 (April 6, 2022), 87 FR 20462 (April 07, 2022).

the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of December 9, 2021 (*86 FR 70144*). The Commission conducted its hearing on April 11, 2022. All persons who requested the opportunity were permitted to participate.

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 raw honey from Argentina, Brazil, India, and Vietnam found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value. We find that critical circumstances exist with respect to imports of raw honey from Vietnam that are subject to Commerce's final affirmative critical circumstances determination.[1] We also find that critical circumstances do not exist with respect to imports of raw honey from Argentina that are subject to Commerce's final affirmative critical circumstances determination.

I. Background

The American Honey Producers Association and the Sioux Honey Association ("SHA") (collectively, "Petitioners") filed the petitions in these investigations on April 21, 2021, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value ("LTFV") imports of raw honey from Argentina, Brazil, India, Ukraine,[2] and Vietnam.[3] Representatives from members of the associations provided written testimony, appeared at the hearing accompanied by counsel, and submitted joint prehearing and posthearing briefs, and final comments.[4]

Several respondent entities participated in the final phase investigations. The National Honey Packers & Dealers Association ("NHPDA") provided written testimony, appeared at the hearing accompanied by counsel, and submitted prehearing and posthearing briefs, and final comments.[5] Purchasers Bimbo Bakeries USA, Inc. ("Bimbo Bakeries"), General Mills Operations, LLC ("General Mills"), Post Holdings, Inc. ("Post"), and Smithfield Foods, Inc. ("Smithfield")

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[1] Commissioner Johanson has made a negative critical circumstances finding with respect to imports of raw honey from Vietnam that are subject to Commerce's final affirmative critical circumstances determination. *See* Separate Views of Commissioner David S. Johanson.

[2] The petition as originally filed included imports of raw honey from Ukraine. On March 24, 2022, citing the war in Ukraine, Petitioners filed a letter with the Commission and Commerce withdrawing the petition as to imports of raw honey from Ukraine. The Commission and Commerce subsequently terminated their respective investigations with respect to raw honey from Ukraine. Confidential Report, Memorandum INV-UU-043 (Apr. 28, 2022) ("CR") and Public Report, USITC Pub. 5327 (May 2022) ("PR") at Table I-1; *Raw Honey from Ukraine; Termination of Investigation*, 87 Fed. Reg. 20462 (Apr. 7, 2022).

[3] CR/PR at I-1.

[4] In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing through written witness testimony and a videoconference held on April 13, 2022, as set forth in procedures provided to the parties. *Raw Honey From Argentina, Brazil, India, Ukraine, and Vietnam, Scheduling of the Final Phase of Antidumping Duty Investigations,* 86 Fed. Reg. 70144 (Dec. 9, 2021).

[5] The Export Packers Company Limited and Sweet Harvest Foods, both importers of the subject merchandise, joined with NHPDA in submitting a separate appendix to NHPDA's Prehearing brief addressing critical circumstances. *See* NHPDA's Prehearing Brief, Appendix A. A representative from Sweet Harvest Honey also appeared at the hearing, accompanied by counsel.

(collectively, "Ingredient Purchasers") provided written testimony, appeared at the hearing accompanied by counsel, and submitted prehearing and posthearing written statements.[6]

U.S. industry data are based on data reported by the National Agriculture Statistics Services of the U.S. Department of Agriculture ("USDA/NASS") and the questionnaire responses of 84 firms that accounted for 31.2 percent of U.S. production of raw honey during 2020 as reported by USDA/NASS.[7] U.S. imports are based on official import statistics and the questionnaire responses of 25 importers that represent 101.5 percent of U.S. imports from subject sources and 71.8 percent of U.S. imports from nonsubject sources in 2020 based on official import statistics.[8] The Commission received 21 usable questionnaire responses from firms that had purchased raw honey during the period of investigation ("POI") (January 2018-September 2021).[9] Foreign industry data are based on the questionnaire responses of 53 firms that reported exports to the United States equivalent to 94.3 percent of U.S. imports of raw honey from Argentina, Brazil, India, and Vietnam during 2020 as reported in official U.S. import statistics.[10]

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."[11] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), defines the relevant domestic industry as the "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of

[6] Because purchasers of the subject merchandise are not interested parties, they submitted brief written statements rather than briefs. A representative from the American Bakers' Association also presented written testimony and appeared at the hearing in opposition to the imposition of duties.

[7] CR/PR at III-2.

[8] CR/PR at I-5, IV-1 n.2. The ***.

[9] CR/PR at II-2.

[10] CR/PR at I-5. Industry data for Argentina are based on 13 firms that provided foreign producer questionnaires to the Commission. These firms' exports to the United States accounted for approximately 97.1 percent of U.S. imports of raw honey from Argentina in 2020. CR/PR at VII-3. Industry data for Brazil are based on 10 firms that provided foreign producer questionnaires to the Commission. These firms' exports to the United States accounted for approximately four-fifths, *i.e.*, 81.6 percent, of U.S. imports of raw honey from Brazil in 2020. CR/PR at VII-10. Industry data for India are based on nine firms that provided foreign producer questionnaires to the Commission. These firms' exports to the United States accounted for approximately 105.6 percent of U.S. imports of raw honey from India in 2020. CR/PR at VII-16. Industry data for Vietnam are based on 21 firms that provided foreign producer questionnaires to the Commission. These firms' exports to the United States accounted for approximately 92.1 percent of U.S. imports of raw honey from Vietnam in 2020. CR/PR at VII-22.

[11] 19 U.S.C. § 1677(4)(A).

the product."[12] In turn, the Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[13]

By statute, the Commission's "domestic like product" analysis begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by Commerce.[14] Therefore, Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is "necessarily the starting point of the Commission's like product analysis."[15] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[16] The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.[17] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[18] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[19]

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[12] 19 U.S.C. § 1677(4)(A).

[13] 19 U.S.C. § 1677(10).

[14] 19 U.S.C. § 1677(10). The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See*, *e.g.*, *USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States,* 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

[15] *Cleo Inc. v. United States,* 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce's subject merchandise in reaching its own like product determination).

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

[17] *See, e.g., Cleo Inc. v. United States,* 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep't 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).

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

[19] *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 (Continued...)

B. Product Description

Commerce defined the scope of the imported merchandise under investigation as:

> {R}aw honey. Raw honey is honey as it exists in the beehive or as obtained by extraction, settling and skimming, or coarse straining. Raw honey has not been filtered to a level that results in the removal of most or all of the pollen, *e.g.,* a level that removes pollen to below 25 microns. The subject products include all grades, floral sources and colors of raw honey and also include organic raw honey.
>
> Excluded from the scope is any honey that is packaged for retail sale (*e.g.,* in bottles or other retail containers of five (5) lbs. or less).
>
> The merchandise subject to this investigation is currently classifiable under statistical subheading 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this investigation is dispositive.[20]

As is evident from the above scope description, these investigations concern raw honey, *i.e.,* honey that has not had most or all of the pollen filtered out, a process performed by "packers."[21] Processing by packers also includes the heating, straining, and FDA grading of the honey.[22] Once processed, the honey is packaged for retail, food service, industrial food manufacturing, and other industrial uses, such as cosmetics.[23] In addition to the scope not including processed honey, the scope language specifically excludes any honey bottled for retail sale.

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the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

[20] *Raw Honey From Argentina: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances,* 87 Fed. Reg. 22179 (Apr. 14, 2022); *Raw Honey From Brazil: Final Determination of Sales at Less Than Fair Value,* 87 Fed. Reg. 22182 (Apr. 14, 2022); *Raw Honey From India: Final Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 87 Fed. Reg. 22188 (Apr. 14, 2022); *Raw Honey From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances,* 87 Fed. Reg. 22184 (Apr. 14, 2022).

[21] Processors of raw honey are known as packers. CR/PR at I-27.

[22] Petitioners' Prehearing Brief at 8 n.10 and Exhibit 4, para. 7. Beekeepers may also perform a certain amount of processing. CR/PR at I-26 to I-27.

[23] CR/PR at I-3. Retail honey is often labeled "raw and unfiltered" even though it has in fact been processed to some extent. Petitioners' Prehearing Brief at 8 n.10 and Exhibit 4, para. 7. Petitioners' witness stated that it is filtered to 150 microns instead of 25 microns. Hearing Tr. at 144 (Blumenthal).

The USDA describes filtered honey as having most of the pollen grains, air bubbles, or other materials normally found in suspension, removed.[24] While the scope language provides 25 microns as an example of the level of filtration that occurs during the processing of raw honey, this level does not appear in honey grading standards or in FDA guidance documents related to the labeling of honey.[25] Rather, 25 microns is an estimate of the size of pollen grains.[26]

C. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that the Commission should define a single domestic like product, coextensive with Commerce's scope, as it did in its preliminary determinations. They contend that the Commission correctly rejected Respondents' arguments in the preliminary phase to define the domestic like product more broadly than Commerce's scope definition to include a downstream product, processed honey.[27]

Petitioners also argue that consistent with the like product definition in the preliminary phase of these investigations, the Commission should not include raw honey packaged for retail sale in its definition of the domestic like product. They maintain that retail packaged raw honey, which is explicitly excluded from Commerce's scope definition and represents roughly 3 percent of beekeepers' sales, differs in important ways from raw honey packaged in bulk containers.[28] Petitioners highlight a survey of market participants in the Commission's final phase questionnaires concerning the comparability of raw honey packaged in bulk and that packaged for retail sale. They maintain that the survey results confirm that raw honey packaged for retail sale differs from raw honey sold in bulk containers.[29]

Respondents' *Arguments*. None of the Respondents addressed the issue of the domestic like product definition in the final phase of these investigations.

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[24] CR/PR at I-16.

[25] CR/PR at I-16.

[26] CR/PR at I-16. The Ingredient Purchasers report that they purchase in-scope raw honey from processors or packers of raw honey for use in products such as ***. The purchased honey is often ***. *See* Ingredient Purchasers' Posthearing Statement, Answers to Commissioner Questions at 10-13. They maintain the honey they purchase is in-scope raw honey because ***. *See* CR/PR at II-2 n.12; Ingredient Purchasers' Posthearing Statement, Answers to Commissioner Questions at 19-21. Petitioners dispute that Ingredient Purchasers purchase raw honey and argue that ***. Petitioners' Prehearing Brief at 49 and Exhibit 8 at paras. 4, 6, 8, and 10 and Attachments B, C and D (***). We assume, for the sake of argument, that the Ingredient Purchasers purchased in-scope raw honey and we have therefore included their questionnaire responses as purchasers. We did not, however, include their pricing data in the price comparisons in order to avoid double counting, as those quantities were already included in the price comparisons as sales from importers to processor/packers. Furthermore, the purchases by Ingredient Purchasers from processor/packers were at a different level of trade than the sales from domestic producers or importers to processor/packers.

[27] Petitioners' Prehearing Brief at 5-7.

[28] Petitioners' Prehearing Brief at 7-9.

[29] Petitioners' Prehearing Brief at 8-9.

D. Analysis

In its preliminary determinations, the Commission defined a single domestic like product coextensive with the scope. It rejected Respondents' arguments that it should expand the domestic like product beyond Commerce's scope definition to include processed honey and raw honey in retail packaging.[30]

In considering Respondents' arguments that it should define the domestic like product more broadly to include processed honey, the Commission indicated that it generally does not define a domestic like product more broadly than the scope definition to include a downstream product such as processed honey. The Commission observed that such an expansion would include firms in the domestic industry (honey packers) whose interests are adverse to the members of the industry (beekeepers) producing the articles (raw honey) subject to investigation. It also declined to apply a semi-finished like product analysis, stating that such an analysis examines whether different articles within the scope at different stages of processing should be included in the same definition of the domestic like product.[31]

The Commission considered whether to include raw honey in retail packaging (also excluded from the scope definition) in its definition of the domestic like product. In doing so, the Commission applied its traditional six-factor like product analysis. The Commission found that raw honey in bulk and raw honey packaged for retail sale share the same physical characteristics other than packaging and may be produced in the same facilities and with the same employees. It found, however, that differences in packaging and price appear to limit interchangeability as a practical matter, and that raw honey in bulk packaging and packaged for retail sale are sold through different channels of distribution. The Commission also noted that information concerning producer and customer perceptions of raw honey in bulk and retail packaging was limited. Finally, it stated that raw honey sold in retail packaging would necessarily be priced higher than that sold in bulk containers.[32]

Given these differences, the Commission determined in its preliminary determinations not to include raw honey in retail packaging in its domestic like product definition and defined the domestic like product coextensive with Commerce's scope definition to include raw honey other than that in retail packaging. The Commission indicated, however, that it would seek additional information relevant to the analysis of this issue in any final phase investigations.[33]

In the final phase of the investigations, the Commission issued questionnaires designed to gather additional information concerning the comparability of raw honey in retail packaging and other raw honey from domestic producers, importers, and purchasers for each of the six domestic like product factors.[34]

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[30] *Raw Honey from Argentina, Brazil, India, Ukraine, and Vietnam*, Inv Nos. 731-TA-1560-1564 (Preliminary), USITC Pub. 5204 (June 2021) ("Preliminary Determinations") at 10-14.

[31] Preliminary Determinations, USITC Pub. 5204 at 10, 10 n.35.

[32] Preliminary Determinations, USITC Pub. 5204 at 12-13.

[33] Preliminary Determinations, USITC Pub. 5204 at 12-13.

[34] In its comments on draft questionnaires in the final phase of the investigations, NHPDA requested that the Commission seek additional information concerning raw honey in retail packaging. NHPDA's Comments on Draft Questionnaires (Sept. 10, 2021) at 5-8. NHPDA did not, however, pursue any domestic like product arguments in the final phase.

In their questionnaire responses, domestic producers generally reported that raw honey in retail packaging is not at all comparable or similar to other raw honey with respect to any of the six domestic like product factors the Commission typically analyzes.[35] The majority of domestic producers reported that raw honey in retail packaging is "never" comparable to other raw honey for each of the six factors.[36]

A majority of purchasers reported that raw honey in different packaging is "somewhat" or "never" comparable for four domestic like product factors: Channels of distribution, manufacturing facilities and employees, producer and customer perceptions, and price. A majority of purchasers indicated that raw honey in different packaging is "fully" or "mostly" comparable with respect to two domestic like product factors: physical characteristics and uses, and interchangeability. Importers reported substantially more comparability between raw honey in different packaging: a majority of importers reported that raw honey in different packaging was "fully" or "mostly" comparable with respect to each domestic like product factor.[37]

Market participants were also asked in the questionnaires to discuss the reasons for the ratings of comparability they provided. While there were a wide range of comments, many of the comments do not address the comparability of retail packaged raw honey and bulk raw honey and instead appear addressed to processed honey.[38] Those comments that do make the proper comparison tend to support the Commission's findings in its preliminary investigations with respect to the six domestic like product factors.[39]

Thus, the comparability information collected in the final phase and limited additional information[40] continue to support defining a single domestic like product coextensive with

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[35] The Commission generally considers the following factors: (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.

[36] *See* CR/PR at Table D-1.

[37] *See* CR/PR at Table D-1.

[38] *See* CR/PR at Tables D-2 to D-4.

[39] The comments indicate that the physical characteristics of raw honey in different packaging are the same but that different packaging of raw honey limits interchangeability. The comments also confirm that raw honey in retail packaging is sold through different channels of distribution: raw honey in retail packaging is sold to retail customers while bulk raw honey is sold to processors. While the comments suggest some overlap in manufacturing facilities, production processes, and production employees, the comments also indicate that raw honey in retail packaging is priced higher than bulk raw honey. With respect to producer and customer perceptions concerning raw honey in retail packaging, market participants' opinions varied widely but suggest comparability to bulk raw honey insofar as the raw honey is the same honey despite being packaged differently. *See* CR/PR at Tables D-2 to D-4.

[40] The record in the final phase indicates that raw honey in retail packaging is sold at higher prices than bulk honey. The financial data staff collected on these sales reflect higher sales values for combined sales. *Compare* CR/PR at Table VI-1 ($1.58 to $1.78 per pound) *with* Table O-1 ($1.62 to $1.82 per pound).

Petitioners have also identified new information in the final phase of the investigations pertinent to the Commission's analysis of raw honey in retail packaging. They attach an exhibit to their (Continued...)

Commerce's scope, as the Commission did in its preliminary determinations. Moreover, no party has argued to the contrary in the final phase. Consequently, we define a single domestic like product consisting of raw honey coextensive with the scope of the investigations.

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."[41] 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 consider below whether appropriate circumstances exist to exclude two related parties from the domestic industry pursuant to the related parties provision.[42] This provision of the statute 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.[43] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[44]

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prehearing brief showing higher prices for honey sold at retail than raw honey sold in bulk. Petitioners' Prehearing Brief at 9 and Exhibit 5. They also highlight two questionnaire responses commenting on the limited interchangeability of raw honey in retail packaging and bulk raw honey. Petitioners' Prehearing Brief at 9 n.12. As noted, Respondents did not address the domestic like product issue in the final phase.

[41] 19 U.S.C. § 1677(4)(A).

[42] 19 U.S.C. § 1677(4)(B).

[43] *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).

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

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

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

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

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

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

In the final phase of the investigations, the record indicates that *** and *** are related parties subject to possible exclusion because of their affiliation with a U.S. importer of subject merchandise.[45]

A. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that the record shows that appropriate circumstances exist to exclude *** and *** from the definition of the domestic industry because they oppose imposition of duties, produce far less raw honey domestically than imported by their affiliate, and account for a small percentage of domestic production. Petitioners also initially stated that ***, and therefore it is "not necessary" to exclude them.[46]

Petitioners, however, reversed their position in their posthearing brief, indicating that the two related parties should be excluded from the domestic industry because each of their responses to the Commission's producer questionnaire were reflective of Respondents' position and not that of domestic producers.[47] They further observed that the domestic industry would ***.[48]

Respondents' Arguments. None of the Respondents addressed the issue of related parties.

B. Analysis

We discuss below whether appropriate circumstances exist to exclude the two related parties from the domestic industry.[49]

**** and ***.* Both *** and *** are domestic producers controlled by an importer of subject merchandise and eligible for possible exclusion as related parties. ***, an importer and purchaser of subject merchandise during the POI.[50] *** is owned by the CEO and Board

[45] CR/PR at III-8 and Table III-2.

[46] Petitioners' Prehearing Brief at 10-11.

[47] Petitioners' Posthearing Brief at 1 n.1.

[48] Petitioners' Posthearing Brief, Answers to Commissioner Questions at 23-26. Petitioners' reversal was in response to a question from Chair Kearns regarding the logic of not excluding a firm from the domestic industry because its effect on the data is small and whether the related parties' narrative or more qualitative responses to U.S. producer questionnaires also skewed the data collected in the staff report. Hearing Tr. at 160-61 (Kearns).

[49] In its preliminary determinations, the Commission found that the two domestic producers – *** and *** – met the statutory definition of a related party because they were related to an importer of subject merchandise. The Commission did not, however, find appropriate circumstances to exclude the two domestic producers because the record did not indicate that ***. The Commission, however, stated that it would reexamine their possible exclusion from the definition of the domestic industry in any final phase investigations. Preliminary Determinations, USITC Pub. 5204 at 14-16; *Confidential Preliminary Determinations,* EDIS Doc. 744844 at 18-22, 22 n.66.

[50] CR/PR at Table III-2; *** Producer Questionnaire at III-9. It is therefore a related party, pursuant to 19 U.S.C. § 1677(4)(B)(ii)(II). The firm also reported that ***. *** Producer Questionnaire at III-9.

Chairman of the same importer ***.[51] Because the importer and domestic producer are controlled by the same individual, the domestic producer *** is a related party.[52] *** and *** accounted for *** percent and *** percent respectively of reported domestic raw honey production in 2020, and both firms *** the petition.[53]

*** imported *** pounds of subject merchandise from *** in 2018, and *** pounds from *** in 2019; it did not import subject merchandise in 2020 or interim 2021.[54] The ratio of its subject imports to *** U.S. production was *** percent in 2018 and *** percent in 2019,[55] and the ratio of its subject imports to *** U.S. production was *** percent in 2018 and *** percent in 2019.[56]

*** explained that it ***.[57] However, ***.[58]

*** and *** also did not directly compete with subject imports; both reported ***, and all their shipments were ***.[59] Thus, they were both arguably shielded from the effects of the subject imports during the POI.

Moreover, the primary interests of *** and *** do not appear to have been aligned with their domestic production operations, but rather lay with their parent company's importation and purchases of subject imports. The ratio of their parent's subject imports to their domestic production was *** for two years of the POI and their parent also purchased substantial quantities of subject merchandise throughout the POI that far exceeded the related parties' domestic production.[60] As previously discussed, both firms oppose the petitions. In fact, ***.[61] We recognize that *** did not import subject merchandise during 2020 or interim

[51] ***. U.S. Producer Questionnaire of *** at I-7 and I-8. ***. Questionnaire of *** at I-5. ***. Importer Questionnaire of *** at 1.

[52] 19 U.S.C. § 1677(4)(B)(ii)(III).

[53] CR/PR at Table III-1.

[54] CR/PR at Table III-20.

[55] CR/PR at Table III-21.

[56] CR/PR at Table III-20.

[57] CR/PR at Tables III-20 and III-22.

[58] *** reported purchases from other importers of subject imports from *** totaling *** pounds in 2018, *** pounds in 2019, *** pounds in 2020, and *** pounds during interim 2021. *** reported purchases from other importers of combined subject sources were *** pounds in 2018, *** pounds in 2019, *** pounds in 2020 and *** pounds during interim 2021. It noted in its questionnaire response ***. CR/PR at Table III-20. Its purchaser questionnaire indicates that it *** in 2020. *See* *** Purchaser Questionnaire at III-24.

[59] *See* U.S. Producer Questionnaires at III-5 and III-9. These transfers are, however, reported at market value which suggests they are not entirely shielded from pricing trends in the U.S. market. *See* U.S. Producer Questionnaires at III-9.

[60] *See* CR/PR at Table III-21. As noted, most of the purchases do ***.

[61] *See* Hearing Tr. at 181-186 (Wenger). Eric Wenger and Brent Barkman also appeared at the Commission's staff conference in opposition to the imposition of duties. *See* Conf. Tr. at 163-170 (Wenger), 192 (Barkman).

2021,[62] and that *** and *** are both "large domestic producers,"[63] which increased their domestic production and made appreciable capital investments over the course of the POI.[64] However, ***, which were significantly more than these related producers' domestic production, along with the direct corporate control of the two related domestic producers, are (in addition to its substantial importation of subject imports from Brazil during 2018 and 2019) factors that weigh in favor of exclusion of the two related parties. Given this record, we find that appropriate circumstances exist to exclude *** and *** from the domestic industry as related parties in the final phase of these investigations.

Consequently, we define the domestic industry to consist of all domestic producers of raw honey, with the exception of *** and ***.

IV. Cumulation[65]

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;

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[62] ***. CR/PR at Table III-20 Note.

[63] Beekeepers with over 3,800 bee colonies were considered "large." Forty-seven large beekeepers reported data to the Commission. CR/PR at III-2. *** reported *** bee colonies in 2020 while *** reported *** colonies. U.S. Producer Questionnaires at III-5.

[64] *See* CR/PR at Table I-1.

[65] 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. 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)).

During the most recent 12-month period preceding the filing of the petitions in these investigations, April 2020 through March 2021, official import statistics indicate that subject imports from Argentina accounted for 20.3 percent of total U.S. imports of raw honey, subject imports from Brazil accounted for 19.2 percent of total U.S. imports of raw honey, subject imports from India accounted for 19.2 percent of total U.S. imports of raw honey, and subject imports from Vietnam accounted for 26.1 percent of total U.S. imports of raw honey. CR/PR at Table IV-5. Because imports for all four investigations were above the negligibility threshold, we find that imports with respect to each subject investigation are not negligible.

(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

(4) whether the subject imports are simultaneously present in the market.[66]

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.[67] Only a "reasonable overlap" of competition is required.[68]

A. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that the Commission should cumulatively assess subject imports from Argentina, Brazil, India, and Vietnam for purposes of present material injury.[69] They contend that there is an overlap of colors of raw honey imported from each subject country and domestically produced raw honey. Petitioners further contend that colors of honey next to each on the color spectrum (*e.g.,* white and extra light amber) are also somewhat substitutable and the routine blending of domestically produced raw honey and the subject imports further supports a finding of substitutability of honey from subject and domestic sources. While most raw honey from Brazil is organic, they maintain that it competes based on price with conventional raw honey from other sources.[70]

With respect to channels of distribution, Petitioners argue that raw honey from each subject country and the domestic like product are primarily sold to packers. Petitioners argue that raw honey from domestic and subject sources is sold to all regions of United States. Finally, Petitioners argue that subject imports from all four subject countries and the domestic like product were present in the U.S. market in each year of the POI.[71]

Respondents' Arguments. Respondents do not address cumulation for present material injury.

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[66] *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).

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

[68] 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.").

[69] Petitioners' Prehearing Brief at 12-16.

[70] Petitioners' Prehearing Brief at 13-15.

[71] Petitioners' Prehearing Brief at 15-16.

B. Analysis

As an initial matter, Petitioners filed all antidumping duty petitions on the same day,[72] April 21, 2021.[73] In addition, we find a reasonable overlap of competition among subject imports from both subject countries, and between subject imports from each source and the domestic like product, for reasons described below.

Fungibility. The record in the final phase of these investigations indicates that raw honey is at least moderately fungible, regardless of source, despite some reported limitations on interchangeability between raw honey from different sources. The great majority of reporting U.S. producers reported that raw honey from each subject country was always interchangeable with the domestic like product as was raw honey from different subject countries.[74] U.S. importers reported less interchangeability. A majority of importers indicated that the domestic like product was frequently interchangeable with subject imports from Argentina. However, a majority of importers reported that the domestic like product was never interchangeable with subject imports from Brazil and Vietnam and sometimes interchangeable with subject imports from India.[75] In comparing subject imports from Argentina, Brazil, and India, a majority of importers indicated that they were sometimes or never interchangeable.[76] A majority of importers reported subject imports from Vietnam were never interchangeable with subject imports from Argentina and Brazil, although they reported subject imports from Vietnam were sometimes interchangeable with subject imports from India.[77]

Purchasers also reported somewhat limited interchangeability for raw honey from domestic and subject sources. A majority of purchasers indicated that the domestically produced product was at least sometimes interchangeable with subject imports from Argentina.[78] However, a majority of purchasers indicated that the domestic like product was never interchangeable with subject imports from Brazil and Vietnam and a majority of purchasers reported that the domestic product was sometimes or never interchangeable with subject imports from India.[79] A majority of purchasers reported that subject imports from Brazil were never interchangeable with subject imports from Vietnam.[80] In contrast, a majority of purchasers reported that subject imports from Brazil and India were sometimes interchangeable.[81] Otherwise when comparing imports from different subject countries, a majority of purchasers reported that they were sometimes or never interchangeable.[82]

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[72] *See* 19 U.S.C. § 1677(7)(G)(i).

[73] CR/PR at Table I-1. None of the statutory exceptions to cumulation apply. *See* 19 U.S.C. § 1677(7)(G)(ii).

[74] CR/PR at Table II-15.

[75] CR/PR at Table II-16.

[76] CR/PR at Table II-16.

[77] CR/PR at Table II-16.

[78] CR/PR at Table II-17.

[79] CR/PR at Table II-17.

[80] CR/PR at Table II-17.

[81] CR/PR at Table II-17.

[82] CR/PR at Table II-17.

The interchangeability of raw honey from different sources was reported to be limited by the darker color and stronger flavor of raw honey from Vietnam, as well as an organic designation for the majority of raw honey from Brazil.[83] Nonetheless, despite differences in the types of raw honey available from different sources,[84] there is substantial overlap in the colors and flavors[85] of raw honey for shipments of the domestic like product and imports from subject countries. Extra light amber honey comprised 23.3 percent of U.S. shipments of domestically produced raw honey, *** percent of U.S shipments of honey from Argentina, *** percent of U.S shipments of honey from Brazil, and *** percent of U.S shipments of honey from India.[86] While there were fewer U.S. shipments of extra light amber raw honey from Vietnam, there was overlap in light amber honey from Vietnam with honey from the other subject sources and the domestic like product.[87] *** U.S. shipments of raw honey from Vietnam were light amber as were 18.0 percent of U.S. shipments of domestically produced raw honey, *** percent of U.S. shipments of honey from Argentina, *** percent of U.S shipments of honey from Brazil, and *** percent of U.S shipments of raw honey from India.[88] A majority of reporting purchasers also reported that colors of raw honey next to each other on the color spectrum (white and extra light amber, extra light amber and light amber, and light amber and amber) were sometimes interchangeable.[89]

Purchasers also reported that the domestic like product and subject imports were comparable for important purchasing factors such as color and quality. Purchasers were asked about the importance of 21 purchasing factors. The five most important factors as reported by purchasers were: 1) availability, 2) reliability of supply, 3) quality meets industry standards, 4) color, and 5) flavor.[90] A plurality or a majority of purchasers rated the domestic like product as comparable to subject imports from Argentina and Brazil for three of the five factors (color, flavor, and quality meets industry standards).[91] A plurality or a majority of purchasers rated the domestic like product as comparable or superior to subject imports from India with respect to

[83] CR/PR at II-34 and II-41.

[84] Just under 90 percent of the subject imports from Brazil were organic raw honey while the vast majority of imports from every other subject country was conventional as was domestic production. *See* CR/PR at Table IV-11. Nonetheless, a majority of purchasers reported that subject imports from Brazil were at least sometimes interchangeable with subject imports from Argentina and a majority of purchasers reported that subject imports from Brazil were sometimes interchangeable with subject imports from India. CR/PR at Table II-17.

[85] CR/PR at Table IV-10 and Fig. IV-4. In general, lighter-colored honeys (*e.g.*, clover honey) are milder than darker-colored honeys (*e.g.*, buckwheat honey) which have a stronger flavor. CR/PR at I-23.

[86] CR/PR at Table IV-10.

[87] CR/PR at Table IV-10.

[88] CR/PR at Table IV-10.

[89] CR/PR at Table II-7. Most U.S. producers reported that these color pairs were always interchangeable. CR/PR at Table II-5. U.S. importers mostly reported that the color pairs were sometimes or never interchangeable. *See* CR/PR at Table II-6.

[90] *See* CR/PR at Table II-11.

[91] CR/PR at Table II-14. A majority rated the domestic product as inferior to subject imports from Argentina and Brazil for availability and reliability of supply. CR/PR at Table II-14.

three of five factors (color, flavor, and quality meets industry standards).[92] A plurality or a majority of purchasers rated the domestic like product as comparable or superior to subject imports from Vietnam with respect to three of the five factors (color, flavor, and quality meets industry standards).[93]

The routine consolidating and blending of raw honey from different sources by packers, including different countries, suggests that raw honey from different sources is often used interchangeably despite some differences in color and flavor.[94] Further, the pricing data show substantial numbers of pricing observations between the domestic like product and subject imports from the four subject countries for the four pricing products.[95] Purchase price data reported by responding firms accounted for approximately 74.9 percent of U.S. producers' U.S. shipments in 2020, 87.4 percent of importers' U.S. shipments of raw honey from Argentina, 84.4 percent of shipments from Brazil, 55.8 percent from India, and 46.8 percent of raw honey from Vietnam in 2020.[96]

Thus, although there are some limitations on the interchangeability of the subject imports from each country and the domestic like product as reflected in the market participants' questionnaire responses, raw honey within each color category regardless of source can at least sometimes be used interchangeably. Further, the overlap in raw honey colors/ flavors and the widespread practice by purchasers of blending raw honey from different sources,[97] indicate that the domestic product and subject imports have a moderate degree of fungibility.

Channels of Distribution. Responding large U.S. producers and importers reported that over half of their total U.S. shipments of domestically produced raw honey were commercial shipments to firms other than co-ops, such as packers/processors.[98]

Geographic Overlap. During the POI, U.S. producers reported selling raw honey to all regions of the United States and U.S. importers reported selling raw honey to all regions in the contiguous United States.[99]

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[92] CR/PR at Table II-14. A majority of purchasers rated the domestic product as inferior to subject imports from India for availability and reliability of supply. CR/PR at Table II-14.

[93] CR/PR at Table II-14. A majority of purchasers rated the domestic product as inferior to subject imports from India for availability and reliability of supply. CR/PR at Table II-14.

[94] CR/PR at I-18, I-23, I-27, II-16. ***. NHPDA's Posthearing Brief, Exhibit 9 (Wenger Affidavit). The Ingredient Purchasers argue that ***. Ingredient Purchasers' Posthearing Statement at 3-5.

[95] The pricing products were based on honey color, specifically, raw white honey, raw extra light amber honey, raw light amber honey, and raw amber honey. CR/PR at V-6.

[96] CR/PR at V-6.

[97] CR/PR at II-16. *See also* Petitioners' Prehearing Brief, Exhibit 7 (examples of retail honey containing blends of honey from multiple countries).

[98] *See* CR/PR at II-1, Table II-1. A substantial portion of the domestic industry's shipments were to cooperatives which function as a packer/processor in the market. *Id.*

[99] CR/PR at Table II-2. Importers did not report sales in Alaska, Hawaii, Puerto Rico or the U.S. Virgin Islands. *Id.* A substantial portion of imports from each subject country also entered the United States in the Eastern region. *See* CR/PR at Table IV-12.

Simultaneous Presence in Market. The record indicates that subject imports from each subject country and the domestic like product were present in the U.S. market throughout the POI.[100]

Conclusion. The record indicates that the domestic like product and imports from each subject source overlap in terms of channels of distribution, geographic markets, and presence in the U.S. market. That overlap, together with the degree of fungibility discussed above, indicate a reasonable overlap of competition. In light of the foregoing, we find a reasonable overlap of competition between the domestic like product and imports from each subject country and among imports from each subject country. We consequently analyze subject imports from Argentina, Brazil, India, and Vietnam on a cumulated basis for our analysis of whether there is material injury by reason of subject imports.

V. 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 cumulated subject imports of raw honey from Argentina, Brazil, India, and Vietnam.

A. Legal Standards

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.[101] 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.[102] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[103] 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.[104] 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."[105]

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[100] *See* CR/PR at Table IV-13. Imports from each subject source were present in every month during January 2018 through December 2021. *Id.* The pricing data also show purchases of the domestic product during each quarter from January-March 2018 to July-September 2021. *See* CR/PR at Tables V-4 to V-7.

[101] 19 U.S.C. §§ 1671d(b), 1673d(b).

[102] 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).

[103] 19 U.S.C. § 1677(7)(A).

[104] 19 U.S.C. § 1677(7)(C)(iii).

[105] 19 U.S.C. § 1677(7)(C)(iii).

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,[106] 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.[107] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[108]

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

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[106] 19 U.S.C. §§ 1671d(b), 1673d(b).

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

[108] 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).

[109] 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.

the injury caused by other factors from injury caused by unfairly traded imports.[110] Nor does the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[111] It is clear that the existence of injury caused by other factors does not compel a negative determination.[112]

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."[113] 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

[110] SAA at 851-52 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports."); *Taiwan Semiconductor Industry Ass'n,* 266 F.3d at 1345 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports." (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int'l Trade 2002) ("{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury" or make "bright-line distinctions" between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that "{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e*., it is not an 'other causal factor,' then there is nothing to further examine regarding attribution to injury"), *citing Gerald Metals,* 132 F.3d at 722 (the statute "does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.").

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

[112] *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.").

[113] *Mittal Steel*, 542 F.3d at 876, 878; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology."), *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

sources to the subject imports." [114] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[115]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.[116] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[117]

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.[118]

1. Demand Considerations

Demand for raw honey is driven by demand for the downstream products in which processed honey is used, such as cereals, baked goods, pharmaceutical products, and hair care products, as well as the demand for processed honey in the retail sector.[119] Raw honey is sold by beekeepers and importers to packers, which process and sell honey to retailers, the food

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[114] *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.

[115] *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.").

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

[117] *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.").

[118] The parties have not addressed application of the captive production provision in the final phase of these investigations. The captive production provision can be applied only if, as a threshold matter, significant production of the domestic like product is internally transferred and significant production is sold in the merchant market. In the final phase of these investigations, internal consumption by larger firms ranged between 3.0 percent and 3.9 percent of the domestic industry's total U.S. shipments of raw honey during the POI, and accounted for 3.0 percent in 2020. CR/PR at Table III-14. While a roughly equal portion of the larger firms' shipments, between 3.0 percent and 3.5 percent, were transferred to related firms, most were reported by domestic producers, ***, which have been excluded from the domestic industry. *See* CR/PR at Table III-14 and U.S. Producer Questionnaires at III-5. By contrast, the commercial U.S. shipments ranged between 93.0 percent and 93.8 percent of the larger firms total U.S. shipments during the POI, and accounted for 93.8 percent in 2020. CR/PR at Table III-14. Because of the relatively modest amount of domestic production internally transferred, we conclude that the threshold criterion is not satisfied and that the captive production provision does not apply in the final phase of these investigations.

[119] CR/PR at I-23 and II-11.

service industry, and industrial customers as a bulk food ingredient.[120] Almost all raw honey gets processed to a degree and raw honey accounts for almost all of the cost of processed honey.[121] Purchasers reported that changes in demand for the end uses of processed honey affected the demand for raw honey.[122]

Most market participants reported that U.S. demand for raw honey had increased since January 1, 2018.[123] Demand reportedly increased in all three categories of uses in the downstream markets.[124] The record indicates that the COVID-19 pandemic caused demand to increase due to an increase in demand for honey products at home.[125] Apparent U.S. consumption increased by 1.8 percent from 2018 to 2020, decreasing from 547.4 million in 2018 to 531.2 million in 2019, before increasing to 557.0 million in 2020; it was higher in interim 2021, at 459.6 million pounds, than in interim 2020, at 369.0 million pounds.[126] In full year 2021, apparent U.S. consumption was 587.4 million pounds.[127]

2. Supply Considerations

The domestic industry was the second largest source of supply to the U.S. market throughout the POI.[128] Domestic production decreased irregularly over the POI, initially increasing from *** pounds in 2018 to *** pounds in 2019, before decreasing to *** pounds in 2020, for an overall decrease of *** percent.[129] It was *** pounds in interim 2020 and *** pounds in interim 2021.[130] Domestic production in full year 2021 was *** pounds.[131] The number of colonies in the United States decreased throughout the POI from 2.8 million colonies in 2018 and 2019 to 2.7 million colonies in 2020 and full year 2021.[132] Beekeepers usually operate at full capacity and can only increase production if they increase the number of their hives.[133] The average yield per colony for the domestic industry also fluctuated from year-to-

[120] CR/PR at I-30.

[121] CR/PR at II-1, II-10.

[122] CR/PR at II-10.

[123] CR/PR at Table II-8.

[124] CR/PR at Table II-8.

[125] *See* CR/PR at II-18. *See also*, Petitioners' Posthearing Brief at Answers to Commissioner Questions, p. 2; NHPDA's Prehearing Brief at 7-8; and Ingredient Purchasers' Prehearing Statement at 1.

[126] CR/PR at Table C-2.

[127] CR/PR at Table G-1.

[128] CR/PR at Table IV-14.

[129] CR/PR at Tables C-2 and H-1.

[130] CR/PR at Table C-2.

[131] CR/PR at Table H-1. Interim period production is based on full year NASS data. CR at Table C-2 n.3. Accordingly, actual production during the nine-month interim periods was likely somewhat lower, although production is seasonal and relatively few beekeepers engage in raw honey production during the fourth quarter. CR/PR at II-17, III-21 & Table III-2.

[132] CR/PR at Tables III-6 and III-7.

[133] CR/PR at II-6. Petitioners estimated that it takes three to four months for a new hive to reach capacity. *See id.*

year, initially increasing from *** per colony in 2018 to *** pounds per colony in 2019, before decreasing to *** pounds per colony in 2020 and *** pounds per colony in full year 2021.[134]

Raw honey production is primarily located in Midwestern states such as North Dakota and South Dakota, but beekeepers are located across the United States.[135] As noted above, virtually all raw honey is processed and packaged. Petitioner SHA is a cooperative that processes, packages, and markets honey for its beekeeper members. Members are required to sell virtually all of their production to the cooperative and are paid a share of the proceeds at the end of the year.[136] SHA reported *** pounds of production by its members in 2020.[137]

Colony collapse disorder ("CCD") and Varroa mites, which carry bee viruses, have historically been major challenges, and both remain major problems for the industry.[138] Beekeepers reported difficulty maintaining their hives during the POI; beekeepers reported having to replace hives each year due to losses from CCD and Varroa mites.[139]

Weather is another major factor affecting yield. Beekeepers cited weather events such as hurricanes, fires, heat, drought, excessive rain/flooding, cold/freeze, thunderstorms, and hail as reducing yield during the POI.[140] Raw honey production is seasonal, but it is often held in inventory and sold throughout year.[141]

Beekeepers also reported that labor costs have risen because they have had difficulty in finding enough labor, and some beekeepers thus increased reliance on temporary agricultural foreign workers through the H2A visa program.[142]

The domestic industry's share of apparent U.S. consumption by quantity decreased irregularly throughout the POI, increasing from *** percent in 2018 to *** percent in 2019, before decreasing to *** percent in 2020; its share of apparent U.S. consumption was lower in

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[134] CR/PR at H-1.

[135] CR/PR at Tables III-4 and III-5. Over 40 percent of beekeepers' colonies were located in the Midwest throughout the POI. *Id*. at Table III-5. However, "{b}eekeepers are often migratory moving their hives as needed to areas in need of bees' pollination services or areas rich in certain flora to promote production of a distinct type of honey." CR/PR at II-2. About two-thirds of colonies are subject to migration. CR/PR at I-25. The migration is generally from north in the summer to south in the winter, as well as to California during almond season (January to March) and several other states for pollination of crops such as melons. *Id*. at I-20-21 and I-25.

[136] CR/PR at I-17 and VI-7.

[137] Petition at 4, Exhibit GEN-1. Slightly fewer than half of the reporting beekeepers were members of SHA. CR/PR at VI-7.

[138] *See* CR/PR at Tables III-3 and III-7. *See also id.* at I-28. CCD became a significant problem in 2006. *Id*. As a result of the disorder, U.S. producers ***. *E.g.*, CR/PR at Table III-3. Varroa mites were introduced to the U.S. bee population in the 1980s. *Honey from China*, Inv. No. TA-406-13, USITC Pub. 2715 (Jan. 1994) at II-7 n.12.

[139] CR/PR at Table III-3.

[140] CR/PR at Table III-3.

[141] CR/PR at II-17, II-24. Honey can be stored in inventory for up to 20 years, but the quality of the honey may degrade. CR/PR at II-6.

[142] CR/PR at Table III-3.

interim 2021, at *** percent, than in interim 2020, at *** percent.[143] Its share of apparent U.S. consumption in full year 2021 was 20.7 percent.[144]

Cumulated subject imports' share of apparent U.S. consumption increased from 56.9 percent in 2018 to 60.1 percent in 2019 and 63.1 percent in 2020; it was higher in interim 2021, at 75.9 percent, than in interim 2020, at 67.5 percent.[145] Their share of apparent U.S. consumption in full year 2021 was 69.9 percent.[146]

Nonsubject imports' share of apparent U.S. consumption decreased from 15.6 percent in 2018 to 11.1 percent in 2019, increasing to 11.4 percent in 2020; it was lower in interim 2021 than in interim 2020, at 8.7 percent and 11.9 percent, respectively.[147] Their share of apparent U.S. consumption in full year 2021 was 9.4 percent.[148] The largest sources of nonsubject imports during the POI were Canada, Mexico, and New Zealand.[149] Honey from China remains subject to an antidumping duty order.[150]

3. Substitutability and Other Conditions

We find that there is at least a moderate degree of substitutability between domestically produced raw honey and cumulated subject imports and that price is an important factor in purchasing decisions.

While the record indicates that product specifications are an important factor in purchasing decisions and some purchasers may have optimized their recipes to work with certain blends, it also indicates that packers blend honey from different sources and across different colors, including domestic and subject sources, suggesting interchangeability of honey from different sources.[151] Market participants indicated that honey across different colors can sometimes be used interchangeably, particularly if the colors are close, for example white and extra-light amber honey.[152] Moreover, when comparing domestic raw honey with subject imports, more than half of responding purchasers reported that the products were comparable with respect to factors pertaining to product quality and characteristics, including product quality meeting industry standards, product range, product specifications, and product consistency as well as honey color and flavor.[153]

As discussed previously, U.S. producers and importers differed in their reports of interchangeability between the domestic like product and subject imports; domestic producers

[143] CR/PR at Table C-2 and Table H-7.

[144] CR/PR at Table G-1.

[145] CR/PR at Tables C-2 and H-7.

[146] CR/PR at Table G-1.

[147] CR/PR at Table C-2.

[148] CR/PR at Table G-1.

[149] CR/PR at II-6.

[150] CR/PR at I-8; *Honey From the People's Republic of China: Continuation of Antidumping Duty Order*, 83 Fed. Reg. 18277 (Apr. 26, 2018).

[151] CR/PR at I-18, I-21, I-27, II-1, II-16. *See also* Hearing Tr. at 169 (Blumenthal), and 224, 226, 290 (Bash).

[152] CR/PR at II-13-14 and Tables II-5-7.

[153] CR/PR at Table II-14.

indicated that product from domestic and subject sources were generally interchangeable, while importers argued that substitutability is limited by end uses based on organic designations, honey color, and floral source.[154] Additionally, purchaser responses were mixed on the comparability of raw honey by source. A plurality of responding purchasers indicated that domestic raw honey, when compared to subject imports from Argentina, Brazil, and nonsubject sources, was comparable or inferior on all factors that were rated as very important to purchasers.[155] A plurality of purchasers indicated that domestic raw honey is comparable or inferior to honey from India and Vietnam on 19 of 20 and 16 of 20 factors respectively.[156] Eight of 21 purchasers also reported purchasing subject imports instead of the domestic like product.[157]

Raw honey is produced from nectar from different floral sources, which determines the color and flavor of the honey, and some purchasers require specific color and flavor profiles.[158] Lighter-colored processed honey is generally sold at retail, while darker honey is more often used as an ingredient in food production and, to a lesser extent, in food service applications.[159] The domestic industry mostly shipped white, extra light amber, and light amber honey, while subject imports were more of the extra light amber and light amber varietals of honey.[160] Furthermore, the production of organic honey in the United States is limited and subject imports from Brazil are primarily organic raw honey.[161] Thus, the record indicates that customer specifications regarding the color and flavor of raw honey, as well as an organic designation, may moderate substitutability to some extent.[162]

The record further indicates that price is an important factor in purchasing decisions for raw honey. The most frequently cited top three factors firms consider in their purchasing

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[154] CR/PR at II-34 and Tables II-15 and II-16. Specifically, the majority of U.S. producers indicated that product from all sources were always interchangeable. CR/PR at II-34 and Table II-15. On the other hand, most importers reported that the domestic like product and product from Argentina were frequently interchangeable or sometimes interchangeable, a majority of importers reported that raw honey from India is sometimes interchangeable with the domestic like product, while most importers reported that raw honey from Brazil and Vietnam is never interchangeable with the domestic like product. CR/PR at II-34 and Table II-16.

[155] CR/PR at II-27 and Table II-14. The one exception is the comparison of honey flavor of U.S. raw honey as compared to Brazilian raw honey, for which eight purchasers reported that the flavor of raw honey from the United States is superior and eight purchasers reported that it is comparable to raw honey from Brazil. *Id*.

[156] CR/PR at Table II-14.

[157] CR/PR at V-27. Five purchasers reported purchasing raw honey from Argentina instead of the domestic like product; four reported purchasing raw honey from Brazil instead of the domestic like product; six reported purchasing raw honey from India instead of the domestic like product; and seven reported purchasing raw honey from Vietnam instead of the domestic like product. *Id*. Only one of these purchasers, ***, reported that price was a primary reason in purchasing subject imports instead of the domestic product. *Id*.

[158] CR/PR at I-23, II-12, II-14.

[159] CR/PR at II-11 and Table II-4.

[160] CR/PR at IV-16 and Table IV-10.

[161] CR/PR at IV-19 and Table IV-11.

[162] *See, e.g.,* CR/PR at II-11-15.

decisions were price/cost (14 firms), specifications/certifications (12 firms), and quality and availability (11 firms each).[163] Fifteen of 21 purchasers reported that price is very important.[164] Additionally, most responding purchasers (12 of 21) reported that they sometimes purchase the lowest-priced product. Two reported that they always purchased the lowest priced product, four reported usually, and three reported never purchasing the lowest priced product.[165]

The primary components of raw honey are fructose, glucose, and water, produced by honeybees. Beekeepers use stacked wooden "bee" boxes that contain bee colony hives; they then extract the raw honey from the boxes and seal it in 55-gallon drums for sale to packers.[166] Virtually all raw honey is processed and packed; some beekeepers pack their own honey, while others sell to independent packers or cooperatives such as SHA.[167] Packers or processors subsequently sell processed honey to retailers, the food service industry, and to industrial customers for bulk food ingredients.[168]

Twenty-six of 39 responding domestic producers and 17 of 23 responding importers indicated that the price of raw materials has increased during the POI, with both groups reporting the cost of lumber (used to produce the boxes containing the hives) and fuel (used to transport the hives) as factors contributing to increased raw material costs.[169] Domestic producers also reported rising costs for bee feed and sugar and inflation as additional factors in the increasing price of raw materials.[170]

Domestic raw honey production is seasonal, with production occurring in summer, and while evidence reflects that there may be peak purchasing activity within the first six to nine months following crop production, honey can be held in inventory for sale at a later time.[171] Many beekeepers who produce raw honey also provide commercial pollination services, primarily for almond crops in California during January to March.[172] In addition to transporting bees for pollination services, beekeepers may transport their bees throughout the year for foraging purposes and to enhance colony survival and growth.[173]

Raw honey is primarily sold from inventory. U.S. producers reported that most of their shipments (89.0 percent) were from U.S. inventories with reported lead times generally ranging from 7 to 45 days, while the remaining 11.0 percent were produced-to-order with lead times of 3 to 180 days.[174] Importers reported that 48.0 percent of their shipments were from U.S. inventories, 28.7 percent were produced-to-order, and 23.4 percent were from foreign inventories. They generally reported lead times averaging 1 to 90 days for product from U.S. inventories and 45 to 120 days from foreign inventories, and 14 to 90 days for product

[163] CR/PR at Table II-10.
[164] CR/PR at Table II-11.
[165] CR/PR at II-23.
[166] CR/PR at V-1.
[167] CR/PR at I-27.
[168] CR/PR at II-17.
[169] CR/PR at V-1.
[170] CR/PR at V-1.
[171] CR/PR at II-17.
[172] CR/PR at I-20-21.
[173] CR/PR at I-25.
[174] CR/PR at II-24.

produced-to-order.[175] U.S. producers reported that 48.8 percent of their commercial U.S. shipments were made pursuant to annual contracts and 31.1 percent through short-term contracts, while subject importers reported that 3.6 percent of their shipments were made through annual contracts and 90.7 percent through short-term contracts.[176]

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."[177]

The volume of cumulated subject imports increased by 12.9 percent from 2018 to 2020, from 311.4 million pounds in 2018 to 319.2 million pounds in 2019, and to 351.7 million pounds in 2020; it was 29.6 percent higher in interim 2021 at 348.9 million pounds than in interim 2020 at 269.2 million pounds.[178]

Subject imports' share of apparent U.S. consumption, by quantity, increased by 6.2 percentage points from 2018 to 2020, increasing from 56.9 percent in 2018 to 60.1 percent in 2019, and 63.1 percent in 2020; their share was also higher in interim 2021, at 75.9 percent, than in interim 2020, at 67.5 percent.[179] The ratio of subject imports to total domestic production increased by 37.7 percentage points from 2018 to 2020. The ratio increased from 204.1 percent in 2018 to 206.4 percent in 2019 and 241.8 percent in 2020.[180]

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[175] CR/PR at II-24-25.

[176] CR/PR at Table V-2.

[177] 19 U.S.C. § 1677(7)(C)(i).

[178] CR/PR at Tables C-2 and G-1. By value, cumulated subject import volume decreased from $310.7 million in 2018 to $276.2 million in 2019 and $295.6 million in 2020; it was $222.2 million in interim 2020 and $416.3 million in interim 2021. *Id.*

U.S. importers' shipments of cumulated subject imports increased by 24.4 percent from 2018 to 2020, from 292.2 million pounds in 2018 to 334.9 million pounds in 2019, and 363.5 million pounds in 2020; they were 10.1 percent higher in interim 2021 (303.5 million pounds) than in interim 2020 (275.7 million pounds). CR/PR at Table E-6.

Because U.S. imports and U.S. producer shipments are based on publicly available data (official import statistics and USDA/NASS data), certain market information such as imports, and U.S. producers' production and shipments are available for all 12 months of 2021. *See* CR/PR at Tables III-4 to III-9 and Appendix G. The absolute volume of subject imports in 2021 was 410.5 million pounds, which is a 16.7 percent increase from 2020. Re-exports have been subtracted from the subject import totals. CR/PR at Table IV-14, C-2.

[179] CR/PR at Table C-2. For the full year 2021, subject imports' share of apparent U.S. consumption increased to 69.9 percent, for an overall increase of 13 percentage points from 2018 to 2021. CR/PR at Table G-1. By value, the market share of cumulated subject imports increased from 40.2 percent in 2018 to 40.9 percent in 2019, and 42.8 percent in 2020; it was higher in interim 2021, at 61.2 percent than in interim 2020, at 47.4 percent. CR/PR at Table C-2.

[180] CR/PR at Table IV-3 (including all USDA/NASS production).

Based on the foregoing, we find that the volume of cumulated subject imports, and their increase, were significant both in absolute terms and relative to production and consumption in the United States.[181]

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.[182]

As previous discussed in Section V.B.3, we find that the domestic like product and cumulated subject imports have at least a moderate degree of substitutability, and that price is an important factor in purchasing decisions for raw honey.

The Commission collected quarterly purchase price data from purchasers of raw honey concerning their purchases of four different colors of raw honey: white, extra light amber, light amber, and amber in 55-gallon drums.[183] Sixteen purchasers provided usable quarterly purchase price data for the four pricing products, although not all firms reported pricing for all products for all quarters.[184] Purchase price data reported by responding firms accounted for

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[181] Respondents have argued that the volume of subject imports was not significant because imports were needed in the U.S. market and subject imports compete only to a limited extent with domestically produced raw honey. We address these arguments and others in our discussion of the impact of the subject imports on the domestic industry in Sections VI.D and VI.E below.

[182] 19 U.S.C. § 1677(7)(C)(ii).

[183] CR/PR at V-6. The four products were defined as:

Product 1.-- Raw white honey (0 – 34 mm), packaged in 55-gallon drums.

Product 2.-- Raw extra light amber honey (35 – 50 mm), packaged in 55-gallon drums.

Product 3.-- Raw light amber honey (51 – 85 mm), packaged in 55-gallon drums.

Product 4.-- Raw amber honey (greater than 86 mm), packaged in 55-gallon drums. *Id.*

The specification in millimeters (mm) refers to the Pfund grade which indicates the darkness of the honey. CR/PR at V-6 n.19.

[184] At NHPDA's request, the Commission collected pricing data from purchasers for the four pricing products. NHPDA's Comments on Draft Questionnaires (Sept. 10, 2021) at 3, 10-11 ("Soliciting pricing data from purchasers would ensure the most comprehensive and representative dataset, because the packers account for all or nearly all sales of imported and domestically produced raw honey in the U.S. market.") (internal quotation marks omitted).

approximately three-fourths, *i.e.*, 74.9 percent, of U.S. producers' U.S. shipments and two-thirds, *i.e.*, 66.7 percent, of importers' U.S. shipments of subject imports in 2020.[185]

The Commission's pricing data show pervasive underselling. Subject imports were priced below domestically produced product in 182 of 194 available quarterly comparisons from the first quarter of 2018 through the third quarter of 2021, at margins ranging up to 60.7 percent and an average underselling margin of 37.2 percent.[186] The quantity of subject imports that undersold the domestic like product during the POI was 818.2 million pounds while 51.1 million pounds oversold the domestic like product.[187] Underselling by subject imports accounted for 94 percent of the quarterly comparisons and 94 percent of the volume encompassed by the pricing data.

The Commission also gathered price data for January 2018-September 2021 from the National Honey Report published by USDA's Agricultural Marketing Service ("AMS") for the same four colors of raw honey used for the purchaser pricing data: white, extra light amber, light amber, and amber.[188] The AMS monthly price data are consistent with the Commission's purchaser data, showing widespread underselling by the subject imports over the POI. Subject imports were sold at lower prices in 505 of 523 instances.[189] The Commission's lost sales and lost revenues survey of purchasers corroborates that subject imports were lower priced than the domestic like product during the POI.[190] Domestic producers also reported losing sales and having to lower their prices due to competition from the subject imports.

Given the importance of price in purchasing decisions, and the extensive pricing data, as well as other record information showing that cumulated subject imports were lower priced than the domestic product as reviewed above, we find that there has been significant price underselling of the domestic like product by subject imports, and as this underselling occurred, subject imports captured sales from the domestic industry and gained market share at the

[185] CR/PR at V-6. The data accounted for 87.4 percent of importers' U.S. shipments of raw honey from Argentina, 84.4 percent of shipments from Brazil, 55.8 percent from India, and 46.9 percent of raw honey from Vietnam in 2020. *Id.* Purchases by the Ingredient Purchasers *** were excluded from the dataset because their downstream purchases of honey from packers had already been reported as purchases by the packers and often were a blend of honey from different sources. *See* CR/PR at V-5 n.16. In addition, purchases by Ingredient Purchasers from packers are at a different level of trade than purchases by packers from producers or importers.

[186] CR/PR at Table V-11. Subject imports oversold the domestic like product at an average margin of 7.4 percent at margins ranging up to 16.2 percent. *Id.*

[187] CR/PR at Table V-11.

[188] CR/PR at V-22 and Appendix L. Unlike Commission pricing data, the AMS data do not specify container size but reported sales are generally over 10,000 pounds. CR/PR at L-3 n.1.

[189] CR/PR at V-22. The consistent underselling by the subject imports in the AMS data is most easily observed in figures V-6 to V-9. CR/PR at V-23 and V-24.

[190] Eight of 21 responding purchasers reported purchasing subject imports instead of domestic raw honey and all eight purchasers reported that subject imports were priced lower than the domestic like product. CR/PR at V-27.

direct expense of the domestic industry.[191] Cumulated subject imports gained 6.2 percentage points of market share from 2018 to 2020, and the domestic industry lost *** percentage points of market share during that timeframe.[192] In addition, cumulated subject imports gained 8.4 percentage points of market share between the interim 2020 and interim 2021 periods, while the domestic industry lost *** percentage points of market share during that timeframe.[193]

We have also considered price trends during the POI. Although the domestic industry's raw honey prices increased during the POI as a whole, that overall trend obscures the price declines in domestically produced raw honey that occurred over the greater portion of the POI, from the first quarter of 2018 to the fourth quarter of 2020.[194] The Commission's purchase price data for domestically produced honey indicate that the purchase price of domestically produced product 1 fell 27.6 percent, the price of product 2 fell 29.7 percent, the price of product 3 fell 13.8 percent, and the price of product 4 fell 18.6 percent over the three-year period.[195] The purchase price data show that prices for domestically produced raw honey generally declined until the latter portion of 2020, before beginning to increase, in late 2020 and into the first three quarters of 2021.[196] AMS data show price decreases from 2018 through 2020 for the same four colors of domestically produced raw honey with price increases not beginning until 2021.[197] Similarly, the domestic industry's net sales average unit values

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[191] Respondents have suggested that the higher quality of domestically produced honey may account for the underselling. Ingredient Purchasers' Prehearing Statement at 27. The record does not support this argument. For instance, purchasers view domestically produced raw honey as comparable to raw honey from Argentina with respect to flavor and "quality meets minimum standards," yet raw honey from Argentina consistently undersold the domestic like product. CR/PR at Tables II-14 and V-12. In general, purchasers also reported that suppliers of the subject imports were more frequently able to meet minimum quality specifications than suppliers of domestically priced honey. *See* CR/PR at Table II-12. Respondents also argued that a preference for domestically produced local honey explains the underselling. NHPDA's Posthearing Brief at 8. Most purchasers, however, reported that buying locally sourced honey was not an important purchasing factor. CR/PR at II-24, Table II-11.

[192] CR/PR at Table C-2.

[193] CR/PR at Table C-2. From 2018 to 2021, subject imports gained 13.0 percentage points of market share and the domestic industry lost *** percentage points of market share. CR/PR at Table G-1. From 2018 to 2020, subject imports gained 6.2 percentage points of market share and the domestic industry lost *** percentage points of market share. *See* CR/PR at Table C-2. Petitioner SHA also reported that it bought subject imports instead of domestic products because of their lower price. CR/PR at V-32.

[194] As discussed below, prices increased in interim 2021 when importers gained knowledge in late 2020 about the imminent filing of the petitions, and prices continued to increase during the pendency of the investigations.

[195] CR/PR at Table V-8 and Tables V-4 to V-7 (calculated percentage declines from first quarter 2018 to fourth quarter 2020).

[196] *See* CR/PR at Figs. V-1 to V-5.

[197] *See* CR/PR at Figs. V-6 to V-9. The AMS data include reports from both domestic producer and purchasers while the Commission's questionnaire data are from 20 purchasers. *See* CR/PR at V-5 and L-3 n1.

("AUVs") declined *** percent from 2018 to 2020.[198] Generally, purchase price data for subject imports followed this same pattern, *i.e.*, declining from 2018 to the beginning of the POI through the latter portion of 2020, before beginning to increase in late 2020 and into the first three quarters of 2021.[199]

Given the declines in the domestic industry's prices for raw honey from 2018 to 2020, in conjunction with the pervasive underselling by subject imports, we consider whether subject imports depressed the domestic industry's prices to a significant degree during this period. Domestic producers reported having to lower their prices due to competition from the subject imports[200] during a time when declining prices would not be expected given the overall increase in demand, as discussed above.[201] The substantial price declines also cannot be explained by domestic industry cost reductions. Although the domestic industry experienced some cost reductions, they were small compared to price declines,[202] and its unit net sales value declined to a greater degree, causing the ratio of its operating expenses to its net sales values to remain high and over *** percent throughout the POI, and increase from 2018 to 2020.[203] Thus, instead of being able to maintain or even increase its prices consistent with rising demand and being able also to increase prices to at least cover operating expenses, the domestic industry faced declining prices for raw honey.[204]

While prices for domestically produced raw honey did begin to increase beginning in the second half of 2020, we find that these increases were at least partly attributable to the behavior of subject imports' prices. When importers became aware in late 2020 that petitions were likely to be filed commencing these investigations, domestic prices for both imported and domestically produced raw honey increased, and continued to increase during the pendency of

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[198] The domestic industry's net sales values decreased from $*** per pound in 2018 to $*** per pound in 2019, before increasing to $*** per pound in 2020. CR/PR at Table C-2.

[199] CR/PR at V-18, Fig. V-5.

[200] Responding U.S. producers generally reported having to reduce prices. Of the 47 responding large U.S. producers, 40 reported that they had to reduce prices and 12 reported that they had to roll back announced price increases. CR/PR at V-25. In addition, five small producers reported that they had to reduce prices, and two reported having to roll back announced price increases. CR/PR at V-25 nn.24 & 25.

[201] *Supra* Section V.B.1. CR/PR at Tables C-2 and G-1.

[202] The domestic industry's unit operating expenses decreased *** percent from 2018 through 2020, while prices for the two most important domestic industry pricing products fell more than 25 percent. CR/PR at Table C-2; CR/PR at Table V-8 and Tables V-4 to V-7 (calculated percentage declines from first quarter 2018 to fourth quarter 2020).

[203] The industry operating expenses as a ratio to net sales increased from *** percent in 2018 to *** percent in 2019 before declining to *** percent in 2020. CR/PR at Tables C-2 and M-1.

[204] CR/PR at Tables C-2 and M-1. Most members of the industry were already reporting losses, and certain beekeepers chose to inventory their honey rather than sell at prices they believed to be too low. CR/PR at VI-13 to VI-14.

the investigations.[205] Indeed, the ***, acknowledged the effect of these investigations on domestic prices, indicating that the investigations had an effect on pricing.[206] [207]

In our view, the increases in market prices after the filing of the petitions indicate that low-priced subject imports, which pervasively undersold the domestic product, materially contributed to the domestic price declines from 2018 to 2020.[208] [209] Given the price declines

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[205] *See* CR/PR at Figs. V-5 to V-9. We recognize that the purchase price data show prices increasing earlier than the AMS data but the general trends are consistent with importer knowledge of the imminent filing of the petitions and the pendency of the investigations affecting prices in late 2020 into 2021.

[206] Petitioners' Prehearing Brief, Exhibit 4, Attachment 1 (***). *See also* Petitioners' Prehearing Brief, Exhibit 4 at 5-6 (Blumenthal declaration) (noting 2021 improvements in market conditions); Hearing Tr at 24 Blumenthal (substantial improvements in pricing since filing of petitions as importers raised prices).

NHPDA argues that the possibility of an antidumping duty case was known in the market in early 2020, when prices were still falling, demonstrating that general knowledge regarding the filing of the petitions does not account for the improvements in prices in the market in 2021. *See, e.g.,* Hearing Tr. at 280-81 (Campbell). As evidence, NHPDA cites an agenda item for a January 2020 annual NHPDA meeting that purportedly concerned the possibility of a trade case being filed. The item on the agenda, however, indicated only an overview of the AD/CVD process and did not refer to the possibility of a new trade case being filed. *See* NHPDA's Posthearing Brief at 10 and Exhibit 10 (agenda item "Overview of Antidumping/Countervailing Duty Petition Process"). Petitioners claim that, beginning in late 2020, the prospect of the investigations led importers to increase their prices. Hearing Tr. at 26 (Hiatt). As Petitioners describe, it was only after a virtual meeting of the AHPA and its counsel on November 10, 2020, discussing the upcoming case at which representatives of packers and importers were present that it became known to NHPDA members with any degree of certainty that the petitions in these investigations would be imminently filed. Petitioners' Prehearing Brief at 59, Exhibit 3 at 5-6 (Hiatt Declaration); Hearing Tr. at 352 (Cannon). Further, ***. Petitioners' Prehearing Brief Exhibit 3 Attachment 1.

[207] We find that the pendency of the investigations affected the pricing of the subject imports in the post-petition period. *See* SAA at 854 ("{w}hen the Commission finds evidence on the record of a significant change in data concerning the imports or their effects subsequent to the filing of the petition or the imposition of provisional duties, the Commission may presume that such change is related to the pendency of the investigation"). *See also* 19 U.S.C. § 1677(7)(I) (Commission considers whether any change in the volume, price effects, or impact of imports of the subject merchandise since the filing of the petition is related to pendency of investigation).

[208] NHPDA has suggested that an increase in demand accounts for the increase in prices in 2021. Hearing Tr. at 280 (Campbell). The record does not support this argument. While the record shows that apparent U.S. consumption was 15.2 percent higher in interim 2021 than in interim 2020, full year data for 2021 show a 5.5 percent increase. *See* CR/PR at Tables C-2 and M-1. In any case, the record does not indicate that there was such a substantial increase in demand that would alone account for the sharp increase in subject import prices observed in 2021. *See* CR/PR at Fig. V-5 (subject import prices).

[209] Commissioner Schmidtlein does not agree that post-petition effects are evidence of price depression earlier in the POI before the petition was filed. Rather, in her view, these price increases do not weigh against a finding of price depression because she accords them less weight as post-petition effects, pursuant to 19 USC § 1677(7)(I).

from 2018 to 2020 during a time of strong and increasing demand, in conjunction with the significant underselling detailed above, and the subject imports' dominant share of the U.S. market , we find that low-priced subject imports depressed prices for domestically produced raw honey to a significant degree.[210]

In sum, we find that the significant underselling by cumulated subject imports enabled the subject imports to gain sales and market share from the domestic industry and depressed the domestic industry's prices to a significant degree.[211] We therefore find that cumulated subject imports had significant price effects.

E. Impact of the Subject Imports[212]

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

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[210] Respondents argue that weak demand for retail honey and the splintering of the market into local markets caused price declines. *See* NHPDA's Posthearing Brief, Exhibit 1 at 6-7. The record does not support their argument that demand for local honey had a large impact on the market downstream or that there were regional honey markets. The record shows that purchasers did not view "buying local" as an important purchasing factor, and that demand for honey for sale at retail was growing as was demand for honey for use as a food ingredient and for food service. *See* CR/PR at II-24, Tables II-8 and II-11. Moreover, purchasers and importers almost unanimously reported that domestic retail demand increased, rather than decreased. CR/PR at Table II-8. In any case, we observe downward price trends for the subject imports for all four pricing products from 2018 to 2020. *See* CR/PR at Fig. V-5. Consequently, even if respondents were correct that different colors of honey tended to go to different downstream markets, differential demand for downstream uses would not be the cause of price declines observed for all four honey colors in the market.

[211] Respondents also argue that subject imports did not cause the observed price declines because they were serving different downstream markets than the domestic like product. NHPDA's Prehearing Brief at 53-55. The record does not support NHPDA's argument of attenuated competition. First, the record shows that there was substantial overlap in the honey colors shipped by domestic and subject sources and that domestically produced and imported raw honey were competing head-to-head for sales to the same purchasers, packers, who, in turn, consolidated and mixed raw honey from different sources to create blends of processed honey to be sold to the different end use segments – ingredient, retail, and food service industries. CR/PR at Table IV-10 and Fig. IV-4. NHPDA acknowledges raw honey from different sources does compete within color/product categories, arguing light amber raw honey from India and Vietnam competed vigorously for sales to packers. NHPDA's Posthearing Brief, Exhibit 1 at 3. We also observe that prices for the domestic like product, though higher than subject import prices, generally followed the same trends as prices for the subject imports. *See, e.g.,* CR/PR at Figs. V-1 to V-6. In our view, this overlap in honey colors and purchasers and correlation in prices, in addition to the large share of the market held by subject imports, indicate that the subject imports were affecting prices for the domestic like product during the POI.

[212] 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 less than fair value concerning imports of raw honey from Argentina, Commerce found dumping margins ranging from 9.17 to 49.44 percent. *Raw Honey From Argentina: Final Determination of Sales at Less Than Fair Value and Final Affirmative*
(Continued...)

the state of the industry."[213] 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 ("R&D"), 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."[214]

The domestic industry began the period with operating losses, and by many measures of its output and financial performance, its condition worsened from 2018 to 2020.[215] As low-priced cumulated subject imports captured market share from the domestic industry and depressed its prices, the domestic industry's output indicators fell, and its financial condition deteriorated as domestic producers incurred reduced sales and revenues. The domestic industry's financial condition improved in interim 2021 when its prices and sales values increased after the filing of the petitions. Nonetheless, the domestic industry continued to report lower production and shipments and it continued to lose market share to lower-priced subject imports.

Determination of Critical Circumstances, 87 Fed. Reg. 22179, 22181 (Apr. 14, 2022). In its final determination of sales at less than fair value concerning imports of raw honey from Brazil, Commerce found dumping margins of 7.89 and 83.72 percent. *Raw Honey From Brazil: Final Determination of Sales at Less Than Fair Value*, 87 Fed. Reg. 22182, 22183 (Apr. 14, 2022). In its final determination of sales at less than fair value concerning imports of raw honey from India, Commerce found dumping margins ranging from 5.52 to 6.24 percent. *Raw Honey From India: Final Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances,* 87 Fed. Reg. 22188, 22189 (Apr. 14, 2022). Finally, in its final determination of sales at less than fair value concerning imports of raw honey from Vietnam, Commerce found dumping margins ranging from 58.74 to 61.27 percent. *Raw Honey From Vietnam: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 87 Fed. Reg. 22184, 22185 (Apr. 14, 2022).

In considering the dumping margins, we take into account in our analysis the fact that Commerce has made final findings that all subject producers in Argentina, Brazil, India, and Vietnam are selling subject imports in the United States at less than fair value. Further, our analysis of the significant underselling of subject imports and their large underselling margins, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[213] 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.").

[214] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act ("TPEA") of 2015, Pub. L. 114-27.

[215] As discussed above, information concerning the domestic industry is based on USDA/NASS data (colonies, yield, production, and shipments) and questionnaire data from 84 beekeepers who provided financial information to the Commission.

Despite an overall increase in apparent U.S. consumption from 2018 to 2020, the domestic industry's production[216] and U.S. shipments[217] declined *** percent and *** percent respectively.[218] Similarly, the industry's output indicators were lower in interim 2021 than in interim 2020 notwithstanding higher apparent U.S. consumption.[219] The number of beekeepers' colonies and their yield declined over the POI.[220] Even with its production declining, the domestic industry's end-of-period inventories increased by 35.6 percent from 2018 to 2020 before falling in 2021.[221] U.S. producers' reported level of inventories increased during the POI, which, as a ratio to U.S. producers' U.S. shipments, increased from *** percent in 2018 to *** percent in 2019 and to *** percent in 2020.[222]

As cumulated subject imports increased, the domestic industry's market share decreased by 6.8 percentage points from 2018 to 2021 (initially increasing from *** percent in 2018 to *** percent in 2019, before falling to *** percent in 2020 and 20.7 percent in 2021).[223]

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[216] U.S. beekeepers' production decreased by *** percent from 2018 to 2020, increasing from *** pounds in 2018 to *** pounds in 2019 and then decreasing to *** pounds in 2020. CR/PR at Table C-2.

[217] U.S. beekeepers' U.S. shipments decreased by *** percent from 2018 to 2020, increasing from *** pounds in 2018 to *** pounds in 2019 and then decreasing to *** pounds in 2020. CR/PR at Table C-2. The industry's exports, a relatively small portion of its total shipments, increased from 3.2 million pounds in 2018 to 5.9 million pounds in 2020. CR/PR at Table III-13.

[218] According to the Commission's questionnaire data, the quantity of the domestic industry's net sales increased from 2018 to 2020 despite NASS data showing that the broader industry's U.S. shipments declined over the same period. *See* CR/PR at Table C-2 and III-13. It is likely that the inconsistency resulted from the net sales quantities being reported by just over 30 percent of the industry. The net sales quantities of the broader industry likely declined along with its U.S. shipments.

[219] U.S. beekeepers' production was lower in interim 2021 (*** pounds) than in interim 2020 (*** pounds). CR/PR at Table C-2. Beekeepers' U.S. shipments were *** percent lower in interim 2021 (*** pounds) than in interim 2020 (*** pounds). CR/PR at Table C-2.

[220] The number of beekeepers' colonies declined over the period from 2.8 million colonies in 2018 and 2019 to 2.7 million colonies in 2020 and 2021. CR/PR at Table III-6. Production yield increased from 54.5 pound per colony in 2018 to 55.8 pound per colony in 2019; yield then fell to 54.5 pound per colony in 2020 and 46.9 pound per colony in 2021. CR/PR at Table III-8.

[221] Beekeepers' end-of-period inventories increased from 29.3 million pounds in 2018 to 40.9 million pounds in 2019 and 39.7 million pounds in 2020; they were lower in 2021 at 23.5 million pounds. CR/PR at Table G-3 (NASS data). Data from the Commission's questionnaires show the same trends. *See* CR/PR at Table III-19. *** domestic producer, ***, and *** declined to sell their honey or found that packers were no longer interested in their honey due to low market prices. CR/PR at VI-13 to VI-14. *See also* Hearing Tr. at 253 (Campbell) (domestic producers holding inventory in anticipation of higher prices after filing of petitions).

[222] CR/PR at Table C-2. According to the NASS data, the domestic producers' ratio of inventory to U.S. shipments increased from 19.4 percent in 2018 to 26.7 percent in 2019 and 28.0 percent in 2020 before decreasing to 19.3 percent in full year 2021. CR/PR at Table G-3.

[223] CR/PR at Tables C-2 and G-1.

The industry's market share was also lower in interim 2021 (*** percent) than in interim 2020 (*** percent).[224]

The domestic industry's financial indicia generally deteriorated from 2018 to 2020 and were somewhat improved in interim 2021 compared to interim 2020.[225] Revenues declined by *** percent from 2018 to 2020, first decreasing from $*** in 2018 to $*** in 2019, and then increasing to $*** in 2020.[226] The industry's operating expenses declined by *** percent from 2018 to 2020, decreasing from $*** in 2018 to $*** in 2019 and $*** in 2020.[227] The domestic industry's ratio of operating expenses to net sales increased from *** percent in 2018 to *** percent in 2019, before falling to *** percent in 2020.[228]

The domestic industry's operating losses increased from $*** in 2018 to $*** in 2019, and then decreased to $*** in 2020.[229] The industry's operating income margin was negative *** percent in 2018, negative *** percent in 2019, and negative *** percent in 2020.[230]

The domestic industry's increased income from government programs enabled it to reduce its net losses from 2018 to 2020.[231] It reported net losses of $*** in 2018, $*** in 2019 and $*** in 2020.[232] The industry's net income margin was negative *** percent in 2018, negative *** percent in 2019, and negative *** percent in 2020.[233] Total net assets by large producers increased, while the industry's negative return on assets fluctuated from 2018 to

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[224] CR/PR at Table C-2. By value, the domestic industry's market share increased overall by *** percentage points from 2018 to 2020, first increasing from *** percent in 2018 to *** percent in 2019 before decreasing to *** percent in 2020; it was lower in interim 2021 (*** percent) than in interim 2020 (*** percent). *Id.*

[225] CR/PR at Table C-2. Large beekeepers are firms that reported having 3,800 or more bee colonies during the POI. CR/PR at III-2. They were asked to report more information (including interim data) than firms with fewer than 3,800 colonies. CR/PR at VI-1 n.4. Thus, the interim data of the 41 large beekeepers is not necessarily comparable with full-year data reported by the 79 beekeepers that includes data from smaller beekeepers.

[226] Large beekeepers reported greater revenue in interim 2021 ($***) than in interim 2020 ($***). CR/PR at Table C-2.

[227] CR/PR at Table C-2. Large beekeepers reported higher operating expenses in interim 2021 ($***) than in interim 2020 ($***). *Id.*

[228] CR/PR at Table C-2. Large beekeepers' ratio of operating expenses to net sales revenues was *** percent in interim 2020 and *** percent in interim 2021. CR/PR at Table C-2.

[229] CR/PR at Table C-2. The large producers reported operating losses of $*** in interim 2020 and $*** in interim 2021. *Id.* *** of 78 beekeepers reported operating losses in 2018, *** reported losses in 2019, and *** reported losses in 2020. CR/PR at Table M-1.

[230] CR/PR at Table C-2. Large beekeepers' operating income margin was negative *** percent in interim 2020 and negative *** percent in interim 2021. *Id*.

[231] Certain government programs provide assistance to beekeepers. *See* CR/PR at VI-15 n.43. Income received from these programs decreased from $*** in 2018 to $*** in 2019 and then increased to $*** in 2020. CR/PR at Table M-1.

[232] CR/PR at Table C-2. The large producers reported net losses of $*** in interim 2020 and $*** in interim 2021. *Id.*

[233] CR/PR at Table C-2. Large beekeepers' net income margin was negative *** percent in interim 2020 and negative *** percent in interim 2021.

2020.[234] Capital expenditures reported by large beekeepers increased from $*** in 2018 to $*** in 2019, and then fell to $*** in 2020.[235]

In contrast to its other indicators, the domestic industry's employment indicators showed some improvement from 2018 to 2020. Information from questionnaires showed that the domestic industry's employment (measured in production-related workers ("PRWs")) increased from *** PRWs in 2018 to *** PRWs in 2019 and *** PRWs in 2020.[236] Hours worked increased from 2018 to 2020, increasing from *** hours in 2018 to *** hours in 2019 and 2020.[237] Wages paid increased from $*** in 2018 to $*** in 2019 and $*** in 2020.[238] Productivity (measured in pounds per 1,000 hours) increased from *** pounds in 2018 to *** pounds in 2019, and then fell to *** pounds in 2020.[239]

In sum, the record shows that the domestic industry's increasingly poor performance from 2018 to 2020 occurred as low-priced cumulated subject imports increased in volume and captured sales and market share from the domestic industry. Cumulated subject imports significantly undersold the domestically produced raw honey and depressed domestic producers' prices. Because of the significant depression of domestic producers' prices and the industry's reduced sales, the industry's revenues were lower than they otherwise would have been. Even with an increase in apparent U.S. consumption the domestic industry's production, shipments, prices, revenues, and market share all declined overall from 2018 to 2020. As a result, the domestic industry reported relatively large operating and net losses from 2018 to 2020. In interim 2021 after the petitions were filed, the industry continued to lose market share to the subject imports although its losses diminished due to increased revenues from higher raw honey prices.[240]

Respondents argue that beekeepers earn much of their income from pollination services and that the Commission should evaluate the industry's performance based on financial results for both honey production and pollination services.[241] Doing so, however, would be improper

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[234] *See* CR/PR at VI-16. Large beekeepers' reported total assets were *** in 2018, *** in 2019 and *** in 2020. CR/PR at Table C-2.

[235] CR/PR at Table C-2. Large beekeepers' capital expenditures were $*** in interim 2020 and $*** in interim 2021. CR/PR at Table C-2. Large firms reported capital expenditures of $*** interim 2020 and $*** in interim 2021. *Id.* Large firms incurred R&D expenses of $*** in 2018, $*** in 2019 and $*** in 2020. CR/PR at Table C-2. Their R&D expenses were $*** in interim 2020 and $*** in interim 2021. *Id.*

[236] CR/PR at Table C-2. Large beekeepers reported employing *** workers in interim 2020 and *** workers in interim 2021. *Id.*

[237] CR/PR at Table C-2. Large beekeepers reported *** hours worked in interim 2020, and in interim 2021. *Id.*

[238] CR/PR at Table C-2. Large beekeepers reported $*** wages paid in interim 2020 $*** paid in interim 2021. *Id.*

[239] CR/PR at Table C-2. Large beekeepers reported productivity of *** pounds per hour in interim 2020 and *** pounds per hour in interim 2021. *Id.*

[240] *See* CR/PR at VI-2. Many domestic producers reported negative effects on their operations and investment as a result of low raw honey prices due to the subject imports. CR/PR at Tables VI-7 and VI-8.

[241] NHPDA's Prehearing Brief at 71-72; NHPDA's Posthearing Brief at 31.

under the statute,[242] and the record does not support Respondents' argument that beekeepers are significantly sacrificing their raw honey production in order to provide pollination services.[243]

Respondents additionally observe that subject imports are needed to serve the U.S. market because apparent U.S. consumption exceeds the domestic industry's production and shipments. However, Respondents' claims ignore the domestic industry's declining U.S. shipments and growing inventories of raw honey[244] during the POI as the domestic industry's raw honey was undersold by the subject imports.[245]

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[242] The statute states that "{t}he effect of dumped imports … shall be assessed in relation to the United States production of a domestic like product if available data permit the separate identification of production in terms of such criteria as the production process or the producer's profits." 19 U.S.C. 1677(4)(D). In accordance with the statute, we focus on beekeepers' raw honey operations and do not broaden our consideration of beekeepers' operations to include pollination services as urged by NHPDA. As is often the case in Commission investigations, firms such as steel producers, use their assets to produce more than one product, and expenses and revenue must be allocated among the different products. CR/PR at VI-10, VI-10 n.23. In these investigations, staff indicated that the amount of production costs that were allocated to raw honey were likely somewhat understated because of the difference in the amount of time spent between commercial pollination and raw honey production, particularly for companies that reported only shared operating expenses (*i.e.,* all small producers and some large producers). CR/PR at VI-10 n.26.

[243] Beekeepers provide pollination for a relatively short period January-March during the offseason for raw honey production. Raw honey production primarily occurs during April-September. CR/PR at III-21, VI-8 n.14. While the domestic industry's yield per colony was lower than honey industries in Brazil, India, and Vietnam, this is not unexpected. The domestic industry's yield per colony is lower than that of honey industries in countries with a tropical climate permitting honey production during more months of the year. *See* Prehearing Report, Memorandum INV-UU-031 at Table II-3 (domestic industry's yield similar to yield Argentina and Ukraine); CR/PR at II-17; Hearing Tr. 200 (Crown) (noting longer production seasons in India and Vietnam).

[244] As noted, some beekeepers chose not to sell their honey at prevailing market prices or found that packers were no longer interested in their raw honey due to low market prices. CR/PR at VI-13 to VI-14.

[245] The Commission has repeatedly explained that "there is no short supply provision in the statute" and "the fact that the domestic industry may not be able to supply all of demand does not mean the industry may not be materially injured or threatened with material injury by reason of subject imports." *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Article 1904 NAFTA Remand) at 108, n.310 (Dec. 2003). *See also, Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Final), USITC Pub. 4062 (Feb. 2009) at 22-23; *Sodium Hexametaphosphate from China,* Inv. No. 731-TA-1110 (Final), USITC Pub. 3984 (March 2008) at 27, n.109); *Electrolytic Manganese Dioxide from China and Australia*, Inv. Nos. 731-TA-1124-25 (Preliminary), USITC Pub. 3955 (Oct. 2007) at 18, n.122; *Certain Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-443 and 731-TA-10995-1097 (Final), USITC Pub. 3884 (Sept. 2006) at 25, n.192, and at 58, n.49; *Certain Activated Carbon from China*, Inv. No. 731-TA-1103 (Preliminary), USITC Pub. 3852 (May 2006) at 19, n.134; *Metal Calendar Slides from Japan*, Inv. No. 731-TA-1094 (Preliminary), USITC Pub. 3792 (Aug. 2005) at 9, n.45 ("To the extent that Respondents claim that the Commission is legally unable to make an affirmative finding of material injury by reason of subject imports because the domestic industry is incapable of supplying domestic demand, they are incorrect.").

Respondents further contend that subject imports were needed to serve the downstream ingredient market (food manufacturers) which they claim the domestic industry cannot serve.[246] However, Ingredient Purchasers' purchases do not explain the volume of subject imports during the POI.[247] Respondents' arguments also overlook the substantial overlap in extra light amber and light amber raw honey produced domestically and which accounted for the majority of the subject imports.[248] Respondents further argue that darker colored raw honey in general, and darker raw honey from Vietnam in particular, is needed by certain food manufacturers because of its floral sources and flavor profile.[249] The record indicates, however, that the Ingredient Purchasers purchased low-priced blended honey from multiple countries.[250] Rather than particular flavors or floral sources, the greater availability and lower prices of the subject imports primarily account for the Ingredient Purchasers'

[246] Ingredient Purchasers' Prehearing Statement at 12; NHPDA's Prehearing Brief at 4-5, 37-38; NHPDA's Posthearing Brief at 1-2.

[247] The Ingredient Purchasers' reported purchases of subject imports totaled *** from January 2018 to September 2021—less than *** percent of subject imports that entered during the period. *See* CR/PR at Tables V-13 and C-2. The Ingredient Purchasers acknowledge that their purchases were of blended honey from various countries and that all of their purchases were from packers or processors of raw honey rather than beekeepers. Despite purchasing honey from processors, they insist the honey has not been filtered to 25 microns, so it remains raw honey rather than processed honey. *See* CR/PR at II-2 n.12; Ingredient Purchasers' Posthearing Statement, Answers to Commissioner Questions at 19-21.

[248] CR/PR at Fig. IV-4; Table E-6. Respondents assert that product from Vietnam is required in the market because of its dark color. However, over half of the product from Vietnam was of light amber honey during the POI, a product the domestic industry produces. *See* CR/PR at Tables E-1 and E-5 (large producers' U.S. shipments were between 18 and 20 percent light amber from 2018 to 2020). Most of importers' shipments of subject imports were light amber or lighter as were the domestic industry's shipments. CR/PR at Tables E-1 and E-6. Further, the greatest increase in subject imports from 2018 to 2020 was in light amber, followed by extra light amber, and then the darkest honey, amber. CR/PR at Table E-6. Thus, it was not "dark" honey leading the increase in subject imports. Eighty percent of the increase in subject imports was in light amber and extra light amber. These two colors accounted for over 40 percent of the domestic industry's shipments. *See* CR/PR at Tables E-1 and E-6.

[249] *See* Ingredient Purchasers' Prehearing Statement at 6-8, NHPDA's Prehearing Brief at 53-55.

[250] Bimbo Bakeries Purchaser's Questionnaire at 11; General Mill's Purchaser's Questionnaire at 12-13, 35, 37; Post' Purchaser's Questionnaire at 12, 14; Smithfield Purchaser's Questionnaire at 10. The Ingredient Purchasers' *** suggests their purchases were not motivated by flavor or floral sources. CR/PR at V-6 to V-7 n.16. Indeed, their purchase contracts specify price, source, and color but often not floral categories or usually flavors. NHPDA's Posthearing Brief Exhibit 10 (contracts); Petitioner's Posthearing Brief Exhibit 1 at 10, Ex. 4 paras 6-7. (Blumenthal Declaration).

purchases.[251] While NHPDA also claims that imports of organic raw honey from subject sources do not take sales from domestic raw honey, the record does not support this claim.[252]

NHPDA additionally argues that Petitioner SHA imported from subject sources and negotiated low prices, and that SHA was therefore partly responsible for the increase in subject imports and their low prices.[253] We disagree with Respondents' interpretation of the record. The imports by SHA (a cooperative of U.S. beekeepers) instead demonstrate that the SHA needed low-priced imports in order to compete in the U.S. market due to low prices.[254]

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[251] The record shows that amber raw honey from Vietnam was generally the lowest-priced raw honey from subject sources suggesting it is not a specialty product. *See* CR/PR at Tables E-2 to E-5. *See also* CR/PR at Figs. V-3 to V-4 and Appendix K (Ingredient Purchasers') (downstream purchase prices lower than domestic producers' prices). Moreover, the Ingredient Purchasers do not claim that the flavor of their products was improved by switching sources of honey. *See* Hearing Tr. at 232 (Bash), 233-34 (Bertrand, Pizer), 234 (Crown). In explaining their purchases, three of four of the Ingredient Purchasers' questionnaire responses report that greater availability accounts for their purchases of raw honey from Vietnam. Two of the four also indicate that either subject imports were low-priced or that domestic honey is a "premium" product. *See* CR/PR at Table V-15 (***). Petitioners provide ***. Petitioners Prehearing Brief, Exhibit 8 and Attachment D.

[252] Respondents highlight that the majority of the subject imports from Brazil are of organic raw honey and there is virtually no domestically produced organic raw honey. They maintain, therefore, that organic raw honey from Brazil is not competing with domestic raw honey. *See* NHPDA's Prehearing Brief at 9-11; NHPDA's Posthearing Brief at 6-7. First, however, it is clear that some processed organic honey from Brazil is directly competing with processed conventional honey at retail. To this extent, organic honey is competing with conventional honey regardless of the organic label. *See* NHPDA's Prehearing Brief, Exhibit 51 (samples of retail honey from grocery stores). While organic honey may be required as an ingredient in certain foods, the portion of demand that requires organic honey rather than conventional honey is unclear. *See* NHPDA's Posthearing Brief, Exhibit 1 at 12 (estimating *** to *** percent of shipments of organic honey were to the retail market). Organic raw honey from Brazil was also competing no differently than other subject imports in the U.S. market in terms of pricing. Even though approximately 90 percent of raw honey from Brazil was organic honey, its prices tracked imports from other subject countries that were overwhelmingly not organic. *See* Figs. IV-5, V-2, and V-3. Importers' shipments of raw organic honey from Brazil were lower priced than conventional honey from Brazil suggesting that major raw honey purchasers do not treat raw organic honey from Brazil as a premium product in the U.S. market. *See* CR/PR at Table F-3. Purchasers also indicated raw honey from Brazil was at least sometimes interchangeable with that from Argentina and India. CR/PR at Table II-17. Thus, the record does not indicate, as Respondents argue, that raw honey from Brazil is not competing with other raw honey in the U.S. market.

[253] NHPDA's Final Comments at 3-4.

[254] SHA explained that domestically produced raw honey from its members could not compete at the price level of subject imports, so it had to blend imports with domestic honey in order to meet competition from the subject imports. Petitioners' Posthearing Brief, Exhibit 1 at 5-7 (citing increasing demands of customers for lower-priced honey). *See also Wooden Bedroom Furniture from China*, Inv. No. 731-TA-1058 (Final), USITC Pub. 3743 (Dec. 2004) at 27, *quoting* S. Rep. No. 100-171, 100th Cong., 1st Sess. 117 (1988) ("The domestic industry may be materially injured by reason of unfair imports even if some producers themselves import in order to stay in business"). The emails also in fact show that ***. *See* NHPDA's Prehearing Brief, Exhibit 50 (collecting emails).

In our analysis of the impact of cumulated subject imports on the domestic industry, we have taken into account whether there are other factors that may have had an adverse impact on the industry during the POI to ensure that we are not attributing injury from other factors to cumulated subject imports. Accordingly, we have examined the role of nonsubject imports and demand. Nonsubject imports accounted for a much smaller share of the market as compared to subject imports.[255] Furthermore, they declined overall during the POI in absolute terms and as a share of the U.S market as subject imports were increasing.[256] Nonsubject imports supplied 15.6 percent of the market in 2018, 11.1 percent in 2019, and 11.4 percent in 2020.[257] We also note that the AUVs for nonsubject imports were well above the AUVs for subject imports throughout the POI and nonsubject imports' AUVs declined only slightly from 2018 to 2020 while subject imports' AUVs declined to a much greater extent.[258] Thus, the worsening of the domestic industry's condition due to low prices for raw honey cannot be explained by nonsubject imports. Further, as noted above, apparent U.S. consumption for raw honey generally increased during the POI. Accordingly, changes in consumption trends do not explain the industry's deteriorating condition.[259] We consequently conclude that other causes cannot explain the injury we have attributed to the cumulated subject imports.

We accordingly find that cumulated subject imports had a significant impact on the domestic industry.

VI. Critical Circumstances

A. Legal Standards

In its final antidumping duty determinations concerning raw honey from Argentina and Vietnam, Commerce found that critical circumstances exist with respect to certain producers/exporters in Argentina and Vietnam.[260] Because we have determined that the domestic industry is materially injured by reason of subject imports from Argentina and Vietnam, we must further determine "whether the imports subject to the affirmative

[255] CR/PR at Tables IV-14 and C-2.

[256] CR/PR at Tables IV-14 and C-2.

[257] CR/PR at Tables IV-14 and C-2. They accounted for 11.9 percent of apparent U.S. consumption in interim 2020 and 8.7 percent in interim 2021. *Id.*

[258] The AUVs for nonsubject imports were $1.49 per pound in 2018, $1.55 per pound in 2019, $1.46 per pound in 2020, $1.49 per pound in interim 2020, and $2.05 per pound in interim 2021. By contrast, the AUVs for subject imports were $1.00 per pound in 2018, $0.87 per pound in 2019, $0.84 per pound in 2020, $0.83 per pound in interim 2020, and $1.19 per pound in interim 2021. *Id.* While imports of raw honey from Ukraine were priced below the domestic product during the POI, the volume of those imports was substantially less than the subject imports. *See* CR/PR at Figs. J-1 to J-3 and Table IV-14. The market share of nonsubject imports from Ukraine increased from 3.3 percent in 2018 to 3.6 percent in 2019 and 4.3 percent in 2020. Their share was 4.2 percent in interim 2020 and 2.8 percent in interim 2021.

[259] CR/PR at Tables IV-14 and C-2. As we have discussed, we do not find that there was a decline in consumption in the downstream retail market for honey that would explain the observed declines in the industry's shipments and market share during the POI.

[260] 87 Fed. Reg. 22179 and 87 Fed. Reg. 22184.

{Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued."[261] The SAA 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."[262] 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}."[263] An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, 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.

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.[264]

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 and 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.[265]

B. Party Arguments

Petitioners' Arguments. Petitioners argue that the Commission should make affirmative findings with respect to subject imports from Argentina and Vietnam subject to Commerce's affirmative critical circumstances determinations. They claim that subject imports from

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[261] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[262] SAA at 877.

[263] *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'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). *See* 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

[264] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[265] *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 (Sept. 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).

Vietnam surged into the United States after the filing of the petitions in April 2021 and before Commerce's preliminary determination in November 2021. Using six-month pre- and post-periods, they calculate that subject imports from Vietnam increased to almost 88 million pounds in the 6 months after the petition was filed, an increase of 83 percent compared to the six months prior to the filing of the petition.[266]

Petitioners argue that importers' inventories of subject imports from Vietnam were *** percent higher in September 2021 than in September 2020. They also claim that *** is stockpiling raw honey from Vietnam, importing *** pounds in August 2021.[267] Petitioners contend that such a stockpiling of imports is the type of behavior that the critical circumstances provision is designed to deter. They also observe that subject imports from Vietnam continued to undersell the domestic product in interim 2021, and will further injure a U.S. industry that is already extremely vulnerable.[268]

Petitioners similarly argue that imports from Argentina subject to Commerce's critical circumstances determination increased by 55.3 percent in the six months after the filing of the petition in April 2021. Petitioners view the increase, from *** pounds to over *** pounds, as designed to "beat" the imposition of provisional duties in November 2021. They also calculate that end-of-period inventories held by importers were *** percent higher in September 2021 at *** pounds than in September 2020. Moreover, they claim that underselling by the subject imports from Argentina continued during interim 2021 and the domestic industry remains vulnerable to further injury.[269]

Finally, Petitioners maintain that imports subject to Commerce's critical circumstances determinations are substantial relative to the U.S. market for raw honey. They calculate the post-petition imports from Vietnam and Argentina subject to Commerce's critical circumstances determination are equivalent to one-fifth and 13 percent, respectively of apparent U.S. consumption in interim 2021.[270]

Respondents' Arguments. NHPDA, Sweet Harvest Foods, and Export Packers Company Limited (collectively, "Joint Respondents") argue that while there have been post-petition increases in the imports and inventories of raw honey from Argentina and Vietnam, the moderately increased quantities are unlikely to have much impact on the U.S. market, as they are small compared to the U.S. market, and are needed to fill a gap caused by the decline in non-subject imports over the POI and the withdrawal of imports from Ukraine from the U.S. market. They argue that packers and other customers are not holding excess levels of raw honey in inventory and that the majority of the increase in subject imports subject to critical circumstances has been sold out of inventory and will no longer affect the market.[271]

[266] Petitioners' Prehearing Brief at 105-108.
[267] Petitioners argue that ***. Petitioners' Posthearing Brief, Exhibit 2, Slide 36.
[268] Petitioners' Prehearing Brief at 108-111.
[269] Petitioners' Prehearing Brief at 111-114.
[270] Petitioners' Posthearing Brief at 14-15.
[271] *See* NHPDA's Posthearing Brief at 14.

Joint Respondents also argue that the increases reflect seasonal import patterns and supply chain disruptions.[272] They urge the Commission to recognize that domestic raw honey prices have been rising during 2021 as demand increases, and the domestic industry is profitable and increasing its U.S. shipments, which, they claim, indicates that increased imports are unlikely to undermine import relief.[273] Joint Respondents assert that the domestic industry also serves a relatively small portion of the market and imports are needed to serve the market, particularly given the war in Ukraine's likely constraining effect on imports from Ukraine.[274]

C. Analysis

On April 7, 2022, Commerce issued its final affirmative determinations in its antidumping duty investigations regarding Argentina and Vietnam.[275] For raw honey from Argentina, Commerce found that critical circumstances exist for raw honey from ACA Coop, Haedo, CIPSA, and other producers/exporters with the exception of NEXCO.[276] For raw honey from Vietnam, Commerce found that critical circumstances exist for raw honey from Ban Me Thuot and DakHoney, the eligible separate rate companies, and the Vietnam-wide entity.[277]

We first consider the appropriate period for comparison of pre-petition and post-petition levels of subject imports from Argentina and Vietnam. The petitions were filed on April 21, 2021.[278] In previous investigations, the Commission has relied on a shorter comparison

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[272] NHPDA's Prehearing Brief, Appendix A at 12-16. *See also* NHPDA's Posthearing Brief, Exhibit 2, Answer 3.

[273] *See* NHPDA's Posthearing Brief, Exhibit 2, Answer 1.

[274] NHPDA's Prehearing Brief, Appendix A at 21-27. NHPDA's Posthearing Brief, Exhibit 2, Answers 4 and 5. Specifically, Respondents assert that the cessation of exports from Ukraine has tightened global supply, necessitating an increased need for subject imports to fill that gap ("there is no support for an affirmative critical circumstances finding, in the face of declining non-subject (including Ukrainian) imports, which are far greater in quantity than the post-petition increases in Vietnamese and Argentinean imports, as well as any remaining inventories thereof."). NHPDA's Prehearing Brief, Appendix A at 26-27.

[275] *Raw Honey From Argentina: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances,* 87 Fed. Reg. 22179 (Apr. 14, 2022); *Raw Honey From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination*, 87 Fed. Reg. 22184 (Apr. 14, 2022).

[276] *Raw Honey From Argentina: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances,* 87 Fed. Reg. 22180 (Apr. 14, 2022); CR/PR at IV-11.

[277] Thus, all producers/exporters are included in Commerce's affirmative critical circumstances determination. *Raw Honey From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination*, 87 Fed. Reg. 22185 (Apr. 14, 2022); CR/PR at IV-11.

[278] Because the petition was filed in the second half of April, that month is included in the "pre-petition" comparison period, consistent with Commission practice. *See, e.g., Small Vertical Shaft Engines from China*, Inv. Nos. 701-TA-643 and 731-TA-1493 (Final), USITC Pub. 5185 at 43; *Carbon and Certain Alloy Steel Wire Rod from South Africa and Ukraine*, Inv. Nos. 731-TA-1353 and 1356 (Final), USITC Pub. 4766 at 8, n.20 (March 2018); *Steel Wire Garment Hangers from Vietnam*, Inv. Nos. 701-TA-487 and 731-TA-1198 (Final), USITC Pub. 4371 at 6 (January 2013).

period when Commerce's preliminary determination applicable to the subject imports at issue fell within the six-month post-petition period the Commission typically considers.[279] This is not the case in these investigations, however, as Commerce's preliminary determinations were issued on November 17, 2021, after the last month in the six-month post-petition period of May 2021 through October 2021.[280] We therefore compare the volume of subject imports six months prior to the filing of the petitions (November 2020-April 2021) with the volume of subject imports in the six months after the filing of the petitions (May 2021-October 2021) for purposes of our critical circumstances analysis in both investigations.

1. Argentina Investigation

Subject imports from Argentina subject to Commerce's affirmative critical circumstances determination increased from *** pounds in the pre-petition period to *** pounds in the post-petition period, an increase of *** percent.[281] The post-petition imports were equivalent to *** percent of apparent U.S. consumption in interim 2021.[282]

End-of-period inventories of subject merchandise from Argentina held by U.S. importers increased from *** pounds on April 21, 2021 to *** pounds on October 31, 2021, a 274 percent increase.[283] Ending inventories of subject imports from Argentina subject to Commerce's critical circumstances determination held by importers were *** pounds on September 30, 2021, representing 2.5 percent of apparent U.S. consumption in the interim 2021 period.[284]

As we have discussed above in Section V.E, prices for the domestic like product and subject imports increased in interim 2021 in response to general knowledge of the imminent filing of the petitions and the pendency of the investigations. Prices for white, extra light amber, and light amber raw honey from Argentina increased from the first quarter of 2021 (January through March) through the second and third quarter of 2021 (April through September) (a rough equivalence to the six-month post-petition period) to a level that either oversold the domestic like product or undersold the domestic like product during the post-

[279] *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 (Sept. 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).

[280] CR/PR at Table I-1. Petitioners and Respondents agreed that six-month comparison periods are appropriate. *See* Petitioners' Prehearing Brief at 105, 111; NHPDA's Posthearing Brief, Exhibit 2, Answer 3.

[281] CR/PR at Table IV-6.

[282] CR/PR at Tables IV-6 and C-2.

[283] CR/PR at Table IV-7.

[284] CR/PR at Tables IV-7 and C-2. The inventories of subject imports from Argentina subject to Commerce's critical circumstances determination increased by *** pounds from September to October 2021, from *** pounds as of September 30, 2021 to *** pounds as of October 31, 2021. If this volume were included in the calculation above, the volume of inventories as of October 31, 2021 as a share of U.S. consumption in interim 2021 would be *** percent. CR/PR Tables IV-7 and C-2.

petition period.[285] Prices of subject imports from Argentina were higher than domestic prices for pricing products 1, 2 and 3 in the second quarter of 2021, and the underselling margins recorded for these imports in the third quarter of 2021 were significantly below those recorded in nearly all prior quarters of the POI.

Although there was an increase in the volume of subject imports from Argentina subject to Commerce's critical circumstances determination and U.S. inventories of imports from Argentina during the post-petition period, apparent U.S. consumption was higher in interim 2021 than interim 2020 by 15.2 percent, and the increase in import volume from Argentina continued the upward pre-petition trend that began in January 2021.[286] Moreover, the import volume totals fluctuated on a month-to-month basis during the post-petition period, with an increase recorded in some months and a decrease recorded in others, but each of the post-petition monthly volume totals remained within a limited range of each other.[287] Inventories of imports from Argentina subject to Commerce's critical circumstances determination (*** pounds) were not disproportionate relative to inventories from other subject sources.[288] With respect to pricing in the post-petition period,[289] prices of subject imports from Argentina increased to levels above those in the pre-petition period and the margins of underselling were significantly below those recorded in nearly all prior quarters of the POI.[290] These data do not clearly indicate a "rush" by Argentinian producers to export substantial volumes of product to the U.S. market at lower prices before a deposit requirement takes effect.

In light of these considerations, we find that the imports from Argentina subject to Commerce's affirmative critical circumstances determination will not seriously undermine the remedial effect of the antidumping duty order with respect to raw honey from Argentina. We therefore make a negative critical circumstances finding with respect to subject imports from Argentina subject to Commerce's affirmative determination of critical circumstances.

2. Vietnam Investigation

As noted above, raw honey imports from Vietnam from all Vietnamese producers/exporters are subject to Commerce's affirmative critical circumstances determination. These imports increased from 48.0 million pounds in the pre-petition period to

[285] *See* CR/PR at Figs. V-1 to V-3.

[286] CR/PR at Figure IV-2. Moreover, we observe that the volume of imports from Argentina subject to Commerce's affirmative critical circumstances in the post-petition period (*** pounds), was *** the volume of total Argentinian subject imports during the equivalent period in 2020 (49.7 million pounds), and less than the volume recorded in the equivalent period in 2018 (53.0 million pounds). CR/PR at Tables IV-6 and IV-13.

[287] CR/PR at Table IV-6.

[288] The inventory total for Argentina (*** pounds) sits within the range of inventories of subject imports as of September 30, 2021 from Brazil (*** pounds) and from India (*** pounds), and well below the total for Vietnam (at *** pounds), as further discussed below. CR/PR at Table C-2.

[289] *See* CR/PR at Table E-2.

[290] CR/PR at Tables V-4, V-5 and V-6.

87.9 million pounds in the post-petition period, an increase of 83.2 percent.[291] The 87.9 million pounds of subject imports in the post-petition period are equivalent to 19.1 percent of apparent U.S. consumption in the interim 2021 period.[292] The volume of subject imports from Vietnam in four of the six months of the post-petition period (July, August, September, and October 2021) significantly exceeded the volume of subject imports from Vietnam recorded in any prior month of the POI.[293]

In addition, subject imports from Vietnam increased rapidly in each of the first four months of the post-petition period, reversing a downward trend from December 2020 to April 2021.[294] The volume of subject imports from Vietnam increased by 53 percent from April to May 2021, by 23 percent further from May to June 2021, by 85 percent further from June to July 2021, and by 97 percent further from July to August 2021.[295] Subject imports from Vietnam then receded during the last two months of the post-petition period, *i.e.*, from August to September 2021, and again from September to October 2021.[296]

Importers' inventories of subject imports from Vietnam subject to Commerce's affirmative determination increased from *** pounds on April 30, 2021 (the last month of the pre-petition period) to *** pounds on October 31, 2021 (the last month of the post-petition period),[297] almost a threefold increase over their April 2021 level.[298] Several importers increased their inventories of subject imports from Vietnam from April 2021 to October 2021 before provisional duties came into effect in November 2021.[299] The volume of inventories as of September 30, 2021 was equivalent to *** percent of apparent U.S. consumption during the interim 2021 period.[300]

In addition, as reviewed above, prices for the domestic like product and subject imports increased in interim 2021 in response to general knowledge of the imminent filing of the

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[291] CR/PR at Table IV-8.

[292] *See* CR/PR at Tables IV-8 and C-2.

[293] CR/PR at Table IV-13.

[294] *See* CR/PR at

[295] *See* CR/PR at Table IV-8. Rather than continuing to increase at a steady rate, monthly subject imports from Vietnam surged to period highs, increasing from 3.9 million pounds in April 2021 to 27.1 million pounds in August 2021, almost seven times the April level.

[296] As discussed, even while receding, the volumes recorded in September and October 2021 still remained higher than the volume recorded in any prior month of the period of investigation aside from the immediately preceding month (August 2021).

[297] CR/PR at Table IV-9.

[298] The inventories on September 30, 2021 also were more than twice that of total inventories of subject merchandise from Vietnam on September 30, 2020. *See* CR at Tables IV-9 and VII-22.

[299] Specifically, *** pounds; *** pounds; *** pounds; *** pounds; *** pounds; *** pounds; the *** pounds; and *** pounds. Supplemental Importer Questionnaires at I-3. As noted, honey can be stored for many years. CR/PR at II-6.

[300] Calculated from CR/PR at Table IV-9 and Table C-2. The volume of inventories of subject imports from Vietnam increased by *** pounds from September to October 2021, from *** pounds as of September 30, 2021 to *** pounds as of October 31, 2021. If this volume were included in the calculation above, the volume of inventories as of October 31, 2021 as a share of U.S. consumption in interim 2021 would be *** percent. CR/PR Tables IV-9 and C-2.

petitions and the pendency of the investigations. However, unlike subject imports from Argentina, subject imports from Vietnam continued to undersell the domestic like product by wide margins during the second and third quarters of 2021 (again, a rough equivalence to the six-month post-petition period).[301]

The Commission views the timing of subject imports from Vietnam in the post-petition period as significant and probative. While apparent U.S. consumption was higher in interim 2021 than interim 2020 by 15.2 percent, importers' U.S. shipments of subject imports from Vietnam were only 2.8 percent higher, a modest increase that does not explain why importers would sharply increase their imports from Vietnam during the post-petition period.[302] Moreover, the rapid increase in subject imports from Vietnam occurred during the first four months of the post-petition period, which precede the retroactive liability period under the critical circumstances provision (*i.e.*, 90 days prior to the date of publication of Commerce's preliminary antidumping determination on November 23, 2021, which is August 25, 2021). This timing, together with the associated volume of subject imports in the post-petition period, suggest that the volume of imports in the post-petition period was not simply responding to increased demand or a continued upward trend of imports from Vietnam, but rather a deliberate effort to enter product into the U.S. market in substantial and increasing volumes while evading potential exposure to the retroactive application of antidumping duties. Further, the volume and increase in volume of subject imports from Vietnam in the post-petition period is substantial, with subject import volumes from Vietnam in the post-petition period comprising nearly *** percent of apparent U.S. consumption.[303] [304] The rapid and substantial increase in

[301] *See* CR/PR at Figs. V-3 and V-4. Importers' shipments of subject imports from Vietnam were only $*** per pound higher at $*** per pound in interim 2021 than $*** per pound in interim 2020. *See* CR/PR at Table E-5. This price increase was less than that recorded by any of the other countries subject to these investigations: an increase of $*** per pound for imports from Argentina; an increase of $*** per pound for imports from Brazil; and an increase of $*** per pound for imports from India. *See* CR/PR at Table E-2, Table E-3, and Table E-4.

[302] *See* CR/PR at Tables C-2 and E-5.

[303] As noted, the post-petition period (May - October 2021) import volume for Vietnam was 87.9 million pounds. NHPDA argues the increase reflects seasonal variation in import patterns and imports from Vietnam have previously increased by similar amounts when comparing import totals from the same pre- and post-petition periods in previous years. NHPDA's Posthearing Brief, Exhibit 2, Answer 3. In our view, there is no clear and substantiated seasonality pattern to imports of raw honey. Even if there is some seasonality, when comparing subject imports from Vietnam in the same months as the post-petition and pre-petition periods in past years, they are not as large as the 83 percent increase in 2021. Petitioners' Posthearing Brief, Exhibit 1 at 40; Petitioners' Final Comments at 12. *See also* CR/PR at Figs. IV-6 and IV-7. Moreover, unlike the case with Argentina, the post-petition volume was well above the volumes recorded in the same period of the prior years of the period of investigation (61.7 million pounds in May-October 2020; 44.5 million pounds in May-October 2019; and 50.5 million pounds in May-October 2018). CR/PR at Table IV-13.

[304] We also do not find Respondents' explanation that imports were needed to serve the market, particularly given the war in Ukraine, to be persuasive. Russia's invasion of Ukraine did not occur until the end of February 2022, well after the surge of imports from Vietnam during the post-petition period. (Continued...)

inventories of subject imports from Vietnam provides further evidence that importers were stockpiling subject imports rather than just responding to U.S. market conditions.[305]

Respondents argue that importers have now sold off much of their inventory, but regardless of where the imported honey is in the supply chain, the volume associated with these inventories is large and increased substantially in the post-petition period and is likely to place downward pressure on prices until it is consumed by end users, particularly given the continued underselling by subject imports from Vietnam at wide margins.[306] Moreover, notwithstanding higher prices, the domestic industry continued to report losses even with higher prices in interim 2021. Its operating expenses-to-net sales ratio remained at over *** percent. The industry's shipments declined, and it continued to lose market share.

Given the volume and timing of imports, including the sharp increase in the volume of post-petition imports prior to the retroactive liability period under the critical circumstances provision, the rapid increase in and size of inventories, and the continued underselling of the domestic like product by wide margins, we find that the remedial effect of the antidumping duty order with respect to subject imports from Vietnam will likely be seriously undermined. We therefore make an affirmative critical circumstances finding with respect to subject imports from Vietnam subject to Commerce's affirmative determination of critical circumstances.

VII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of raw honey from Argentina, Brazil, India, and Vietnam found by Commerce to be sold in the United States at less than fair value. We find that critical circumstances exist with respect to imports of raw honey from Vietnam that are subject to Commerce's final affirmative critical circumstances determination.[307] We also find that critical circumstances do not exist with respect to imports of raw honey from Argentina that are subject to Commerce's final affirmative critical circumstances determination.

Nor does the record support Respondents' claim that shipping delays caused the increase in subject imports. Respondents have only offered evidence of general shipping delays rather than particular delayed orders. They do not provide with sufficient specificity how the timing of the shipping delays corresponded to increases in the monthly volume of subject imports during the post-petition period. NHPDA's Prehearing Brief, Appendix A at 12-16.

[305] Raw honey from Vietnam typically is used as an ingredient in food products. NHPDA's Prehearing Brief at 37. The honey, however, is a relatively small share of the total cost of the food product, and demand for the honey is relatively inelastic. CR/PR at II-11 to II-12 and II-41. It is therefore likely that the increased imports and inventories of subject imports from Vietnam remained in inventory somewhere in the supply chain and were not immediately consumed.

[306] *See* NHPDA's Prehearing Brief, Appendix A at 10-12, 19-20; NHPDA's Posthearing Brief at 14-15. One of the largest importers of subject imports and ***" NHPDA's Posthearing Br. Exh. 4 at para 14 (Nubern Affidavit). However, this statement ***. ***. NHPDA's Posthearing Br. Exh. 4.

As to raw honey held downstream, we note that the Ingredient Purchasers fully participated in the final phase of these investigations, yet ***, one of the Ingredient Purchasers who participated in the final phase of these investigations.

[307] Commissioner Johanson dissenting.

Separate Views of Commissioner David S. Johanson

While I join the Commission's Views on material injury in their entirety, 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 raw honey from that country. I join, however, the majority's discussion of the legal standards and the parties' arguments regarding critical circumstances (Sections VI.A. and VI.B.) as well as the majority's reasoning regarding the use of a 6-month period of comparison and its negative critical circumstances determination regarding raw honey imports from Argentina (Section VI.C.1.).

As discussed below, I do not find that the increase in imports and inventories of subject raw honey from Vietnam in the post-petition comparison period would be likely to "undermine seriously the remedial effect of the antidumping order" as (1) increased imports were consumed prior to the order and thus could no longer compete against domestic products; and (2) the petition and order have already proven they can provide relief to the domestic industry.

I. Unfairly traded imports in the post-petition period were consumed

A. Importer and purchaser stockpiles of unfairly traded products were depleted by the time of the order

Subject imports from Vietnam during the six months following the filing of the petition exceeded the increase in U.S. importers' U.S. inventories of raw honey from Vietnam: subject imports from Vietnam totaled 87.9 million pounds from May 2021 through October 2021, while U.S. importers' inventories increased by only *** pounds.[1] Thus, importers had sold off *** percent of those imports by the end of October 2021.[2] Respondents assert that from November 2021 to March 2022, importers' inventories of raw honey from Vietnam decreased another *** percent as they sold off products to purchasers, based on data from eight importers.[3] Respondents also assert that packers' inventories decreased *** percent, based on data from five packers.[4]

Petitioners assert that Respondents' data regarding inventory declines may not be representative of importers and purchasers as a whole, based on the claim that ***.[5] The evidence, however, does not support Petitioners' claim.

[1] NHPDA Post-Hearing Br. 13; CR/PR at Tables IV-8 & IV-9.

[2] Calculated from CR/PR at Tables IV-8 & IV-9.

[3] NHPDA Posthrg. Br. 14.

[4] NHPDA Posthrg. Br. 14.

[5] Pet. Posthearing Br. 14. Petitioners also point out that Respondents did not provide data regarding final inventory levels from ***. Pet. Final Comments 14. ***. *** Importer QR at II-9a; CR/PR at Table V-13.

1. ***

*** reported purchasing *** pounds of raw honey from Vietnam in 2018, *** pounds in 2019, and *** in 2020, at an average rate of about *** pounds per quarter.[6] It sourced about ***.[7]

According to Petitioners' prehearing brief, ***.[8] In their posthearing brief, Petitioners intimated that this honey may be ***.[9] Yet, the declarations that Petitioners supplied to support their assertions instead attest only that ***.[10] That does not support that ***.[11]

Recent inventory figures for *** are on the record. It reported that it possessed ***.[12] ***.[13]

I do not find that the existence of the remaining *** inventories in themselves is likely to undermine seriously the remedial effect of the order for two reasons. First, the *** pounds of honey from Vietnam that *** had in stock at the end of the first quarter of 2022 equaled only *** percent of U.S. apparent consumption in 2021.[14]

Second, even if these inventories had not been available to ***, that would not necessarily mean that *** would have bought domestic products instead. In the case of ***.[15] Only two percent or less of U.S. producers' shipments are amber or darker.[16] Due to some purchasers' continued preference for honey from Vietnam, importers including *** continued to import and sell honey from Vietnam even with interim deposit requirements in place and at higher prices than domestically produced honey.[17] Purchasers buying Vietnamese honey with 400 percent interim deposit requirements would be more likely to buy it at final deposit rates of about 60 percent.[18]

2. Increasing demand has and will absorb more domestic production

An additional factor that explains why inventories of imports from Vietnam have been drawn down so extensively, also mitigating any impact that remaining stocks of unfairly traded

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[6] *** purchaser QR at II-2f. ***. *** purchaser QR at III-31(c).

[7] *** purchaser QR at II-7.

[8] Petitioner Prehearing Br. 109-110 (emphasis added, citations omitted).

[9] Pet. Posthearing Br. 14. *See also* Pet. Posthearing Br. answers at 30 (***).

[10] Pet. Prehearing Br. Exh. 5 at ¶ 24 ***.

[11] *** Purchaser QR at II-2f; Petitioner Prehearing Br. 110. ***. *** Purchaser QR at 13.

[12] NHPDA Posthearing Br. Exh. 4 at Nubern Dec. attachment 2.

[13] NHPDA Posthearing Br. Exh. 4 at Nubern Dec. ¶¶ 9-10.

[14] Calculated from CR/PR at Table G-1 and NHPDA Posthearing Br. Exh. 4 at Nubern Dec. attachment 2.

[15] *** purchaser QR at III-31c.

[16] CR/PR at Table E-1.

[17] Hearing Tr. 213 & 229-30 (Nubern), 275 (Neves); Ingredient Purchasers' Post-Hearing Br. 10-12.

[18] Raw Honey from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, 87 Fed. Reg. 22,184, 22,185 (Dep't Commerce April 14, 2022) (final duty rates).

imports may have, is that demand for honey increased in 2021 and is likely to continue to increase indefinitely. Apparent consumption of raw honey was 587.4 million pounds in 2021, an increase of 5.5 percent or 30.4 million pounds from apparent consumption in 2020.[19] Apparent consumption is an imperfect guide to actual consumption, but there was a strong consensus among market participants that actual demand for honey was and is rising due to a number of factors that are leading Americans to consume more honey.[20] Thus, at least some of the substantial increase in apparent consumption likely reflected increased actual consumption.

3. Poor honey yield in the United States in 2021, and orders on other subject countries, led to more rapid diminution of import inventories

Yet another factor eliminating inventories prior to the order is that the U.S. industry produced and shipped significantly less domestic honey in 2021 than it had in 2020 because U.S. production decreased by *** percent or *** pounds from 2020 to 2021.[21] This production decline occurred primarily as 2021 was a bad year for honey production in the United States: overall U.S. producers' average yield per colony decreased 13.9 percent from 2020 to 2021, likely due at least in part to drought conditions in some important states and unusually high honeybee mortality in 2020-2021.[22] Some U.S. producers liquidated inventory to meet the supply shortfall, but overall apparent consumption of U.S.- produced honey declined 20 million pounds from 2020 to 2021.[23]

After the six-month post-petition period ended, little honey from Vietnam was imported because of provisional deposit requirements of over 400 percent imposed in November – and what was imported subject to those requirements was fairly traded. Thus, even ordinary consumption levels prior to the issuance of the order in April 2022 would have greatly depleted the additional supplies of subject imports that had arrived after the petition. Further, as discussed above, those supplies were being depleted at a greater than ordinary rate. With less domestically produced honey on the market than in previous years (and little new U.S. production feasible until spring), consumers would have had to consume millions of pounds more imported raw honey in 2021 and early 2022 just to maintain their previous levels of honey consumption, let alone to increase it. While imports and inventories of honey from other

[19] CR/PR Table G-1.

[20] *See supra* Section V.B.2; CR/PR at II-18 ("U.S. producers cited two main reasons for increases in both U.S. and foreign demand for honey: perceived health benefits and the desire to 'eat local.' Importers and purchasers cited similar reasons … including population growth, perceived health/nutrition benefits of honey, and the impact of the COVID-19 pandemic.").

[21] CR/PR at Table C-2. Interim production data in table C-2 are actually for the full year 2021. CR/PR at Table C-2 fn.3.

[22] Hrg. Tr. 185 (Wenger) (drought); CR/PR at Tables III-3 & III-8 (low yield); Nathalie Steinhauer et al., "United States Honey Bee Colony Losses 2020-2021: Preliminary Results" at 1-2 (June 23, 2021), EDIS Doc. No. 766825.

[23] CR/PR at Table G-1.

countries also increased, and were higher in interim 2021 than in interim 2020,[24] those increases also would be likely to be matched by reduced imports following imposition of interim deposit requirements on honey imports from Argentina, Brazil, and India at the same time as Vietnam, further exacerbating market shortages.

4. Supply shortages following the petitions confirm that inventories of subject merchandise were being exhausted

A majority of purchasers (15 of 20) reported that suppliers declined to supply them following the filing of the petition, while six U.S. producers and 14 importers reported refusing to supply purchasers during that period.[25] When purchasers could not get sufficient supply after the petition was filed, they would have drawn down their own stockpiles.

Thus, while subject imports and importers' inventories of subject imports from Vietnam increased after the petition, much if not all of that buildup had been physically eliminated by the time the order took effect in order to satisfy increased demand and to replace diminished volumes of domestically produced and imported honey.

II. Improved Market Conditions and Performance of the Domestic Industry

Another factor relevant to whether post-petition imports are likely to "seriously undermine" the remedial effect of the order is that both market conditions and the domestic industry's performance have improved markedly since the petition was filed, or even before the petition when market participants learned it was imminent.

Comparing interim 2021 to interim 2020, large domestic producers' net sales were *** percent higher, and their operating and net losses were smaller, their operating margin improved from negative *** percent to negative *** percent, and their net margin improved from negative *** percent to negative *** percent.[26]

The industry still incurred operating losses during the interim 2021 period, but I attach less weight to this fact than I otherwise would for three reasons.

First, domestic honey yields in 2021 were much lower than in previous years for reasons largely unrelated to subject imports, as discussed above.

Second, reliable access to government programs such as disaster assistance makes net profits relatively more important than they are for other industries for purposes such as investment decisions. Net losses were considerably smaller than operating losses.

Third, beekeepers on average make less money from honey production than they do from commercial pollination fees; they also sell other products such as beeswax.[27] Our injury analysis focuses on the domestic like product, raw honey, but provision of pollination services

[24] Imports from all subject sources other than Vietnam were 61.3 million pounds greater in interim 2021 than in interim 2020. Calculated from CR/PR Table C-2. Nonsubject imports were 7.5 million pounds lower in interim 2021 than in interim 2020. Calculated from CR/PR Table C-2.

[25] CR/PR at II-9.

[26] CR/PR at Table C-2. Interim period financial data was not collected from small producers but these represented a small share of the total production represented in questionnaire responses.

[27] CR/PR at Table VI-5.

by beekeepers is a condition of competition that affects how honey producers respond to price increases. For purposes of deciding how many colonies to operate, beekeepers will consider how much they will earn from all sources of beekeeping revenue that those colonies can generate. As beekeepers normally operate at full capacity and cannot increase honey production without increasing the number of hives they use,[28] this means that decisions to increase honey production also depend on income from other products. Thus, producers would invest more in bee colonies and honey production when prices increase even if they still earn a small loss on honey production. Thus, any "undermining" that could be associated with small losses on honey production is less "serious."

Finally, the domestic industry's condition has continued to improve since the end of interim 2021. As the president of Sioux Honey declared,

> The filing of this case has had a substantial beneficial impact on pricing in the U.S. market. … {W}e had set our plan to offer an average price of ***. These increases have proven very beneficial to our member beekeepers and the communities in which they operate.[29]

As noted above, domestic producers' inventories were at the lowest levels on record by the end of 2021,[30] and rising demand will give domestic producers even more opportunity to liquidate inventories and raise prices. The recent reduction of imports from Ukraine will put additional upward pressure on U.S. honey prices.[31]

III. The Critical Circumstances Standard Has Not Been Satisfied

Finally, I note that the statute permits an affirmative finding of critical circumstances only if it is "likely" that the remedial effect of the order will be "seriously" undermined. In my view, the record contains clear evidence that the increase in unfairly traded subject imports in the six-month period following the petition was largely if not entirely eliminated in the next six months before the order, and the domestic industry's condition sharply improved. The record lacks evidence that could resolve the exact size of any diminished amount of unfairly traded merchandise that might remain, such as evidence regarding final inventory levels of most importers and purchasers, the propensity of end users to hold inventory, actual consumption, and the rate at which fairly traded imports arrived immediately before the order to replace unfairly traded ones. While it is possible that enough remained to have an impact, the statute permits an affirmative critical circumstances finding only if the imports subject to the Department of Commerce's critical circumstances determination "likely" will "undermine seriously" the order's remedial effect. Given the evidence in this record, I cannot find that this standard is met.

[28] CR/PR at II-6.
[29] Pet. Prehearing Br. Exh. 4 (Blumenthal Dec.) ¶ 22.
[30] CR/PR at Table G-3.
[31] CR/PR at II-18.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by the American Honey Producers Association ("AHPA"), Bruce, South Dakota, and the Sioux Honey Association ("SHA"), Sioux City, Iowa, on April 21, 2021, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value ("LTFV") imports of raw honey[1] from Argentina, Brazil, India, Ukraine, and Vietnam.[2] Table I-1 presents information relating to the background of these investigations.[3] [4]

Table I-1
Raw honey: Information relating to the background and schedule of this proceeding

Effective date	Action
April 21, 2021	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (86 FR 22265, April 27, 2021)
May 11, 2021	Commerce's notice of initiation (86 FR 26897, May 18, 2021)
June 7, 2021	Commission's preliminary determinations (86 FR 30980, June 10, 2021)
November 23, 2021	Commerce's preliminary determinations (86 FR 66524, 86 FR 66526, 86 FR 66528, 86 FR 66531, and 86 FR 66533; November 23, 2021; 87 FR 2127; January 13, 2022); scheduling of final phase of Commission investigations (86 FR 70144, December 9, 2021)
March 31, 2022	Commission's termination of the investigation on raw honey from Ukraine (87 FR 20462, April 07, 2022)
April 6, 2022	Commerce's termination of the LTFV investigation on raw honey from Ukraine (87 FR 19855, April 06, 2022)
April 12, 2022	Commission's hearing
April 14, 2022	Commerce's final determinations (87 FR 22179, 87 FR 22182, 87 FR 22188, 87 FR 22184, April 14, 2022)
May 11, 2022	Commission's vote
May 27, 2022	Commission's views

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

[2] On March 24, 2022, Petitioners' withdrew the petition on raw honey from Ukraine. The Commission and Commerce subsequently terminated their investigations of raw honey from Ukraine.

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

[4] Appendix B presents the witnesses that appeared at the Commission's hearing.

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--[5]

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

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

advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—[6]

(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 I of this report presents information on the subject merchandise, subsidy and dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII 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.

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

Market summary

Raw honey as described in the scope of these investigations is generally used as an input to be processed and packaged for retail, food service, industrial food manufacturing, and other industrial uses, such as cosmetics. The largest U.S. producers of raw honey for which questionnaire data were received include ***, ***, and ***. Leading exporters of raw honey to the United States include ***, ***, and *** of Argentina; ***, ***, and *** of Brazil; ***, ***, and *** of India; and ***, ***, and *** of Vietnam. The leading U.S. importers of raw honey from subject sources are ***, ***, and ***. Leading importers of raw honey from nonsubject countries include ***, ***, and ***. U.S. purchasers of raw honey are firms that process and pack raw honey or use honey in their products; leading purchasers include ***, ***, and SHA.

Apparent U.S. consumption of raw honey totaled 557.0 million pounds ($690.1 million) in 2020. U.S. producers' U.S. shipments of raw honey totaled 141.7 million pounds ($301.6 million) in 2020 and accounted for 25.4 percent of apparent U.S. consumption by quantity and 43.7 percent by value. U.S. shipments of imports from subject sources totaled 351.7 million pounds ($295.6 million) in 2020 and accounted for 63.1 percent of apparent U.S. consumption by quantity and 42.8 percent by value. U.S. shipments of imports from nonsubject sources totaled 63.6 million pounds ($92.9 million) in 2020 and accounted for 11.4 percent of apparent U.S. consumption by quantity and 13.5 percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on data reported by the National Agriculture Statistics Services of the U.S. Department of Agriculture ("USDA/NASS") and the questionnaire responses of 84 firms that accounted for 31.2 percent of U.S. production of raw honey during 2020 as reported by USDA/NASS. U.S. imports are based on U.S. import statistics of the U.S. Department of Commerce provided for in the Harmonized Tariff Schedule of the United States ("HTS") under statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065 and the questionnaire responses of 25 companies that represented 101.5 percent of U.S. imports from subject sources and 71.8 percent of U.S. imports from nonsubject sources in 2020 based on official import statistics.[7] Foreign industry data are based on the questionnaire response of 53 firms that reported exports to the United States equivalent to 94.3 percent of U.S. imports of raw honey from Argentina, Brazil, India, and Vietnam during 2020 as reported in official U.S. import statistics.

Previous and related investigations

Section 201 honey investigation

In 1976, the Commission conducted an investigation concerning honey under section 201 of the Trade Act of 1974. At that time, the Commission determined that honey was being imported into the United States in such increased quantities as to be a substantial cause of the threat of serious injury to the domestic industry producing articles like or directly competitive with the imported article. The Commission found that a tariff-rate quota system was necessary to prevent the threatened injury.[8] On August 28, 1976, President Ford advised Congress that, "import relief for the U.S. industry engaged in the commercial production and extraction of honey is not in the national economic interest."[9]

[7] Usable questionnaire responses from U.S. importers represented 97.0 percent of U.S. imports from all sources in 2020.

[8] *Honey, Report to the President on Investigation No. TA-201-14 Under Section 201 of the Trade Act of 1974*, USITC Publication 781, June 1976.

[9] 41 FR 36787, August 28, 1976.

Section 406(a) honey investigation

On October 6, 1993, following a request from the U.S. Trade Representative, the Commission instituted an investigation under the provisions of section 406(a) of the Trade Act of 1974. As a result of the investigation, the Commission determined that imports of honey from China were increasing rapidly so as to be a significant cause of market disruption to a domestic industry in the United States. On January 7, 1994, the Commission reported its determinations and recommendations to the President.[10] On April 21, 1994, President Clinton determined that import relief for honey was not in the national interest of the United States and directed the U.S. Trade Representative to develop a plan to monitor imports of honey from China.[11]

China AD investigation and suspension agreement

On October 3, 1994, the American Beekeeping Federation ("ABF") and the AHPA filed a petition alleging that an industry in the United States was materially injured and threatened with material injury by reason of LTFV imports of honey from China. The Commission subsequently made an affirmative preliminary determination,[12] and Commerce issued a preliminary determination finding dumping margins ranging from 127.52 to 157.16 percent ad valorem.[13]

On August 2, 1995, Commerce and representatives of the government of China concluded an agreement that suspended the investigations being conducted by the Commission and Commerce concerning honey from China. The suspension agreement obligated the government of China to restrict the volume of honey exports to the United States from all Chinese producers/exporters[14] and establish a pricing mechanism for Chinese exports.[15] Specifically, Chinese honey exported to the United States could not be sold at a price less than a reference price, which the agreement defined to be "92 percent of the weighted-

[10] *Honey From China*, Investigation No. TA-406-13, USITC Publication 2715, January 1994.

[11] 59 FR 19627, April 25, 1994.

[12] *Honey from the People's Republic of China*, Investigation No. 731-TA-722 (Preliminary), USITC Publication 2832, November 1994.

[13] 60 FR 14725, March 20, 1995.

[14] The export limit was set at 43.925 million pounds plus or minus a maximum of 6 percent per year based on changes in the U.S. market for honey. 60 FR 42522, August 16, 1995.

[15] 60 FR 42521, August 16, 1995.

average of the honey unit import values from all other countries for the most recent six months of data available at the time the reference price is calculated."[16]

On July 3, 2000, the Commission and Commerce instituted five-year reviews concerning the suspended investigation on honey from China.[17] The U.S. industry elected not to participate in the sunset review of the suspended investigation because it believed that the reference price mechanism of the suspension agreement was unsuccessful in establishing price stability. Because no domestic interested party expressed a willingness to participate in the five-year sunset review, Commerce published a notice on July 28, 2000, terminating the suspended investigation concerning honey from China.[18]

Argentina and China AD/CVD investigations

On September 29, 2000, AHPA and SHA filed petitions with Commerce and the Commission alleging that an industry in the United States was materially injured and threatened with material injury by reason of LTFV imports of honey from Argentina and China and by reason of subsidized imports of honey from Argentina. The Commission completed these investigations on November 19, 2001, determining that an industry in the United States was materially injured by reason of imports of honey from Argentina that were found by Commerce to be subsidized by the Government of Argentina and by reason of imports of honey from Argentina and China that were found by Commerce to be sold at LTFV.[19] On December 10, 2001, Commerce issued its antidumping duty order on China with the final weighted-average dumping margins ranging from 25.88 to 183.80 percent.[20] On December 10, 2001, Commerce issued its antidumping and countervailing duty orders on Argentina with the final weighted-average dumping margins ranging from 27.04 to 55.15 percent and an estimated countervailable subsidy rate of 4.53 percent.[21]

[16] Following consultation and negotiation between China and the United States, an agreement was reached to change the period for the calculation of the reference price. Beginning on July 1, 1998, the reference price was based on the most recent three months of data.

[17] 65 FR 41053, July 3, 2000 and 56 FR 41085, July 3, 2000.

[18] 65 FR 46426, July 28, 2000.

[19] *Honey from Argentina and China: Investigation Nos. 701-TA-402 and 731-TA-892-893 (Final)*, USITC Publication 3470, November 2001, p. 1.

[20] 66 FR 63670, December 10, 2001.

[21] 66 FR 63672, December 10, 2001.

In November 2006, the Commission instituted the first five-year reviews on honey from Argentina and China.[22] On February 5, 2007, the Commission determined that it would conduct expedited five-year reviews of the antidumping duty orders on honey from Argentina and China and the countervailing duty order on honey from Argentina.[23] On March 7, 2007, Commerce published its determination that revocation of the antidumping duty orders on honey from Argentina and China and the countervailing duty order on honey from Argentina would be likely to lead to continuation or recurrence of dumping and of a countervailable subsidy.[24] On July 18, 2007, the Commission notified Commerce of its determination that material injury would be likely to continue or recur within a reasonably foreseeable time.[25] Following affirmative determinations in the first five-year reviews by Commerce and the Commission, effective August 2, 2007, Commerce issued a continuation of the antidumping duty orders on imports of honey from Argentina and China and the countervailing duty order on imports of honey from Argentina.[26]

On July 2, 2012, the Commission instituted the second five-year reviews on honey from Argentina and China.[27] On September 21, 2012, Commerce published notice that it was revoking the countervailing duty and antidumping duty orders on honey from Argentina because no domestic interested party responded to the sunset review notice of initiation.[28] Subsequently, the Commission terminated the reviews concerning honey from Argentina effective September 27, 2012.[29]

[22] 71 FR 64292, November 1, 2006.
[23] 72 FR 6745, February 13, 2007.
[24] 72 FR 10150, March 7, 2007.
[25] 72 FR 39445, July 18, 2007.
[26] 72 FR 42384, August 2, 2007.
[27] 77 FR 39257, July 2, 2012.
[28] 77 FR 58524, September 21, 2012.
[29] 77 FR 64827, October 23, 2012.

On October 5, 2012, the Commission determined that it would conduct an expedited review of the antidumping duty order on honey from China.[30] On October 1, 2012, Commerce published its determination that revocation of the antidumping duty order on honey from China would be likely to lead to continuation or recurrence of dumping.[31] On November 29, 2012, the Commission notified Commerce of its determination that material injury would be likely to continue or recur within a reasonably foreseeable time.[32] Following affirmative determinations in the five-year review by Commerce and the Commission, effective December 13, 2012, Commerce issued a continuation of the antidumping duty order on imports of honey from China.[33]

On November 1, 2017, the Commission instituted a third five-year review of the antidumping duty order on honey from China,[34] and on February 5, 2018, the Commission determined that it would conduct an expedited review of the order.[35] On March 9, 2018, Commerce published its determination that revocation of the antidumping duty order on honey from China would be likely to lead to continuation or recurrence of dumping.[36] On April 19, 2018, the Commission notified Commerce of its determination that material injury would be likely to continue or recur within a reasonably foreseeable time.[37] Following affirmative determinations in the third five-year review by Commerce and the Commission, effective April 26, 2018, Commerce issued a continuation of the antidumping duty order on imports of honey from China.[38]

[30] 77 FR 65204, October 25, 2012.
[31] 77 FR 59896, October 1, 2012.
[32] 77 FR 72385, December 5, 2012.
[33] 77 FR 74173, December 13, 2012.
[34] 82 FR 50683, November 1, 2017.
[35] 83 FR 11562, March 15, 2018.
[36] 83 FR 10432, March 9, 2018.
[37] 83 FR 17445, April 19, 2018.
[38] 83 FR 18277, April 26, 2018.

Circumvention and country-of-origin issues

Effective August 21, 2012, Commerce made an affirmative final determination of circumvention of the antidumping duty order on honey from China.[39] Additionally, Congress has taken steps to prevent illegal Chinese honey transshipments from entering the United States and facilitating the verification of country-of-origin markings of imported honey. As part of the Trade Facilitation and Trade Enforcement Act of 2015, Congress directed U.S. Customs and Border Protection ("CBP") to address concerns that honey is being imported into the United States in violation of the customs and trade laws of the United States. Congress directed CBP to compile a database of the individual characteristics of honey produced in foreign countries, engage with foreign governments, and consult with the U.S. honey industry to facilitate the verification of country-of-origin markings of imported honey.[40]

Nature and extent of sales at LTFV

On November 23, 2021, Commerce published a notice in the Federal Register of its preliminary determinations of sales at LTFV with respect to imports from Argentina, Brazil, India, Ukraine, and Vietnam.[41] On April 14, 2022, Commerce published a notice of its final determinations of sales at LTFV with respect to imports from Argentina, Brazil, India, and Vietnam. Tables I-2 through I-6 present Commerce's dumping margins with respect to imports of product from Argentina, Brazil, India, and Vietnam.

[39] Commerce found that blends of honey and rice syrup, regardless of the percentage of honey they contain, from China are later-developed merchandise, and instructed U.S. Customs and Border Protection to suspend liquidation of all entries of blends of honey and rice syrup, from China that were entered, or withdrawn from warehouse, for consumption on or after December 7, 2011. 77 FR 50464, August 21, 2012.

[40] Congress outlines measures to prevent honey transshipment into the United States and to ensure that imported honey meet certain health and safety standards. *Trade Facilitation and Trade Enforcement Act of 2015*, Public Law 114-125, 114th Congress, sec. 608, February 24, 2016.

[41] 86 FR 66531, 86 FR 66533, 86 FR 66528, 86 FR 66524, and 86 FR 66526, November 23, 2021.

Table I-2
Raw honey: Commerce's final weighted-average LTFV margins with respect to imports from Argentina

Exporter/producer	Final dumping margin (percent)
Asociacion De Cooperativas Argentinas Cooperativa Limitada	24.67
NEXCO S.A.	9.17
Industrias Haedo S.A.	49.44
Companıa Inversora Platense S.A.	49.44
All others	16.92

Source: 87 FR 22179, April 14, 2022.

Table I-3
Raw honey: Commerce's final weighted-average LTFV margins with respect to imports from Brazil

Exporter/producer	Final dumping margin (percent)
Melbras Importadora E Exportadora Agroindustrial Ltda	7.89
Apiario Diamante Comercial Exportadora Ltda/Apiario Diamante Producao e Comercial de Mel Ltda (Supermel)	83.72
All others	7.89

Source: 87 FR 22182, April 14, 2022

Note: Commerce determined that Apiario Diamante Comercial Exportadora Ltda and Apiario Diamante Producao e Comercial de Mel Ltda are affiliated and should be treated as a single entity.

Table I-4
Raw honey: Commerce's final weighted-average LTFV margins with respect to imports from India

Exporter/producer	Final dumping margin (percent)
Allied Natural Product	6.24
Ambrosia Natural Products (India) Private Limited/Ambrosia Enterprise/Sunlite India Agro Producer Co. Ltd	5.52
All others	5.87

Source: 87 FR 22188, April 14, 2022.

Table I-6
Raw honey: Commerce's final weighted-average LTFV margins with respect to imports from Vietnam

Exporter	Producer	Final dumping margin (percent)
Ban Me Thuot Honeybee Joint Stock Company	Ban Me Thuot Honeybee Joint Stock Company	61.27
Daklak Honeybee Joint Stock Company	Daklak Honeybee Joint Stock Company	58.74
Dak Nguyen Hong Exploitation of Honey Company Limited TA, Nguyen Hong Honey Co., LTDTA	Dak Nguyen Hong Exploitation of Honey Company Limited TA, Nguyen Hong Honey Co., LTDTA	60.03
Nhieu Loc Company Limited	Nhieu Loc Company Limited	60.03
Hoang Tri Honey Bee Company Limited (a.k.a. Hoang Tri Honey Bee Co., Ltd), H. T Honey Co., Ltd	Hoang Tri Honey Bee Company Limited (a.k.a. Hoang Tri Honey Bee Co., Ltd), H. T Honey Co., Ltd	60.03
Viet Thanh Food Technology Development Investment Company Limited, Viet Thanh Food Co., Ltd	Viet Thanh Food Technology Development Investment Company Limited, Viet Thanh Food Co., Ltd	60.03
Dongnai HoneyBee Corporation	Dongnai HoneyBee Corporation	60.03
Sai Gon Bees Limited Company, Saigon Bees Co., Ltd., Sai Gon Bees Co., Ltd	Sai Gon Bees Limited Company, Saigon Bees Co., Ltd., Sai Gon Bees Co., Ltd	60.03
Huong Rung Trading—Investment and Export Company, Huong Rung Co., Ltd	Huong Rung Trading—Investment and Export Company, Huong Rung Co., Ltd	60.03
Hai Phong Honeybee Company Limited	Hai Phong Honeybee Company Limited	60.03
Bao Nguyen Honeybee Co., Ltd	Bao Nguyen Honeybee Co., Ltd	60.03
Southern Honey Bee Company LTD	Southern Honey Bee Company LTD	60.03
Golden Bee Company Limited	Golden Bee Company Limited	60.03
Than Hao Bees Company Limited	Than Hao Bees Company Limited	60.03
Daisy Honey Bee Joint Stock Company, Daisy Honey Bee JSC, Daisy Honey Bee J.S.C	Daisy Honey Bee Joint Stock Company, Daisy Honey Bee JSC, Daisy Honey Bee J.S.C	60.03
Bee Honey Corporation of Ho Chi Minh City, Bee Honey Corp. of Ho Chi Minh City, Behonex Corp	Bee Honey Corporation of Ho Chi Minh City, Bee Honey Corp. of Ho Chi Minh City, Behonex Corp	60.03
Phong Son Limited Company, Phong Son Co., Ltd	Phong Son Limited Company, Phong Son Co., Ltd	60.03
Hoa Viet Honeybee One Member Company Limited, Hoa Viet Honey Bee Co., Ltd., Hoa Viet Honeybee Co., Ltd	Hoa Viet Honeybee One Member Company Limited, Hoa Viet Honey Bee Co., Ltd., Hoa Viet Honeybee Co., Ltd	60.03
Vietnam-wide Entity	Vietnam-wide Entity	60.03

Source: 87 FR 22184, April 14, 2022.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[42]

Raw honey is honey as it exists in the beehive or as obtained by extraction, settling and skimming, or coarse straining. Raw honey has not been filtered to a level that results in the removal of most or all of the pollen, e.g., a level that removes pollen to below 25 microns. The subject products include all grades, floral sources and colors of raw honey and also include organic raw honey.

Excluded from the scope is any honey that is packaged for retail sale (e.g., in bottles or other retail containers of five (5) lbs. or less).

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations are provided for in HTS heading 0409.00.00, natural honey. More specifically, subject raw honey is imported under the following HTS statistical reporting numbers: (1) 0409.00.0005 natural honey that is certified organic (regardless of color), (2) 0409.00.0035 for other natural honey that is white or lighter in color, (3) 0409.00.0045 for other natural honey that is extra light amber in color, (4) 0409.00.0056 for other natural honey that is light amber in color, and (5) 0409.00.0065 for other natural honey that is amber or darker in color.[43] The 2022 general rate of duty is 1.9 cents per kilogram for imports classified under HTS subheading 0409.00.00.[44]

[42] 86 FR 66524, 86 FR 66526, 86 FR 66528, 86 FR 66531, and 86 FR 66533, November 23, 2021

[43] USITC, *Harmonized Tariff Schedule of the United States (2022 Revision 2)*, p. 4-89.

[44] None of the subject countries are eligible for special rates of duty for imports classified under HTS 0409.00.00. Furthermore, GSP treatment for heading 0409.00.00 is limited to the least-developed countries and none of the subject countries are listed as least-developed beneficiary countries. Legal authorization for the GSP program expired on December 31, 2020. USTR, "Generalized System of Preferences (GSP), Program information, 2021 Expiration," https://ustr.gov/issue-areas/preference-programs/generalized-system-preferences-gsp/program-information/2021-expiration, accessed March 28, 2022; 83 FR 17561; USITC, *Harmonized Tariff Schedule of the United States (2022 Revision 2)*, General Note 4, GN pp. 11-13.

In addition to the general rate, U.S imports of honey produced in China that are classified under heading 0409.00.00 were included in the modified Section 301 action against China as of September 21, 2018 (List 3).[45] Items on this list were subject to additional duties of 10 percent *ad valorem* as of September 24, 2018, with this additional duty increasing to 25 percent *ad valorem* as of January 1, 2019.[46] The 25 percent additional duties were twice postponed, but eventually implemented as of May 10, 2019 and continue to be in effect.[47] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

The product

Descriptions and uses[48]

Honey is a sweet viscous fluid derived from the nectar of flowers collected by bees and processed in their honey sacs. Honey is an invert sugar, composed of approximately 39 percent fructose; 33 percent glucose; 11 percent maltose, sucrose and other sugars; and 17 percent water.[49]

[45] 83 FR 47974, September 21, 2018.

[46] 83 FR 47974; USITC, *Harmonized Tariff Schedule of the United States (2022 Revision 2)*, U.S. Note 20(f) to Chapter 99, pp. 99-III-26-28.

[47] 83 FR 65198; 84 FR 7966; 84 FR 20459; USITC, *Harmonized Tariff Schedule of the United States (2002 Revision 2),* U.S. Note 20(f) to Chapter 99, pp. 99-III-26-28.

[48] Unless indicated otherwise the discussion in this section is based on information contained in *Raw Honey from Argentina, Brazil, India, Ukraine, and Vietnam; Inv. Nos. 731-TA-1560-1564 (Preliminary), USITC Publication 5204, June 2021 ("Preliminary publication"), pp. I-11-15; Raw Honey from China, Inv. No. 731-TA-893 (Third Review), USITC Publication 4776, April 2018, pp. I-7-9; Honey from Argentina and China, Inv. Nos. 701-TA-402 & 731-TA-892-893 (Review), USITC Publication 3929, June 2007; Honey From China 731-TA-893 (Second Review), USITC Publication 4364, November 2012, pp. I-16-18;* and Bradbear, Nicola, *Bees and Their Role in Forest Livelihoods, FAO, Rome, 2009.*

[49] Honey contains trace amounts of acids, minerals, protein, and enzymes. Bradbear, Nicola, *Bees and Their Role in Forest Livelihoods, FAO, Rome, 2009, p. 85.*

USDA standards

The USDA has issued voluntary standards for grades of (1) Comb Honey, and (2) Extracted Honey.[50] These standards define the comb as being the wax-like cellular structure that bees use as storage for honey and pollen and describe extracted honey as honey that has been separated from the comb by centrifugal force, gravity, or by other means. The scope of these investigations defines raw honey as including "honey as it exists in the beehive" or comb honey as defined by USDA, and "as obtained by extraction, settling and skimming, or coarse straining" or extracted honey as defined by USDA.

In the extracted honey standards, USDA further describes styles of extracted honey as being filtered or strained. Filtered honey has been filtered to the extent that all or most of pollen grains, air bubbles or other materials normally found in suspension, have been removed. Strained honey has been strained such that most of the comb, propolis, or other defects normally found in honey have been removed.[51] Straining does not normally remove grains of pollen, small air bubbles, and other very fine particles. These standards do not make a distinction based on the micron level of filtration.

While the scope of raw honey in these investigations gives 25 microns as an example of the level that removes most or all pollen from honey, this level of filtration does not appear in USDA documents related to honey grading standards or in FDA guidance documents related to the labeling of honey.[52] USDA references micron level in its Commercial Item Description (CID) for honey, but only in reference to the maximum level of filtration for filtered honey, stating:

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[50] USDA, AMS, *United States Standards for Grades of Extracted Honey,* May 23, 1985; USDA, AMS, *United States Standards for Grades of Comb Honey, May 24, 1967.*

[51] Propolis is a gum like substance created by honeybees from collected tree resins that has been shown to have antimicrobial properties. Wild honeybee colonies use it to coat the inner surface of cavities (propolis envelop) where they build nests, and it is believed to provide health benefits. While managed bees produce propolis to seal cracks in the commercial hive, they do not produce a propolis envelop. Pass the Honey, "What is Propolis," August 29, 2019, https://passthehoney.com/blogs/the-buzz/what-is-propolis, accessed March 21, 2022; Simone-Finstrom, Michael et al., "Conference Report: Proceedings of the 2019 American Bee Research Conference," Insects, https://www.mdpi.com/2075-4450/11/2/88, accessed March 21, 2022.

[52] USDA, AMS, United States Standards for Grades of Extracted Honey, May 23, 1985; USDA, AMS, United States Standards for Grades of Comb Honey, May 24, 1967; FDA, "Proper Labeling of Honey and Honey Products: Guidance for Industry," February 2018, https://www.fda.gov/files/food/published/PDF--Guidance-for-Industry--Proper-Labeling-of-Honey-and-Honey-Products.pdf, (accessed May 24, 2021).

"Such honey is not filtered to less than 1.0 micron (µm)."[53] Several commercial honey sites, as well as the *Young Naturalist,* identified 25 microns as the average size of pollen grains without attribution.[54]

Honey Color

The color of honey is influenced by many factors including: phenolics, carotenoids, sugars, minerals, pollens, water content, floral and geographic origin, temperature and time conditions of processing/handling/storage, and age.[55] Though USDA standards for extracted honey include color designations, the color of extracted honey is not a factor of quality for the purpose of USDA honey grades.[56] Nonetheless, color is an important attribute of honey that plays a significant role in consumer perceptions and choices, and historically has been a price-defining property.[57]

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[53] Commercial Item Descriptions (CIDs) are product descriptions that concisely describe the most important characteristics of a commercial product. CIDs are official U.S. Government procurement documents that are: (1) uniquely numbered in a Federal series, (2) prominently dated for easy reference; (3) appropriately titled (according to current Federal labeling policies). USDA, "Commercial Item Description, Honey," A-A-20380, October 23, 2019, https://www.ams.usda.gov/grades-standards/cids, (accessed May 24, 2021).

[54] Foxhound Bee Company, "Does Straining Honey Remove the Pollen?" https://www.foxhoundbeecompany.com/does-filtering-or-straining-honey-remove-pollen-from-honey/, (accessed May 24, 2021; Stone's Farm, "Pollen in Honey," http://www.stonefamilyfarms.com/blog/143-pollen-in-honey, (accessed May 24, 2021); Huney Grams Honey Bee, LLC, "Do we 'filter' our honey," https://huneygramshoneybees.wordpress.com/2019/01/16/do-we-filter-our-honey/, (accessed May 24, 2021); Hiller, Ilo, *Young Naturalist,* "Airborne Pollen."

[55] Hasnul Hadi, M.H. et. al., "The Amber-Colored Liquid: A Review on the Color Standards, Methods of Detection, Issues and Recommendations, *Sensors 2021*, 21, 6866, https://doi.org/10.3390/s21206866, accessed April 19, 2022, p.21; Bodor, Zsanett et. al., "Colour of Honey: Can We Trust the Pfund Scale?" *LWT–Food Science and Technology*, 149 (2021) 111859, https://www.researchgate.net/publication/352154739_Colour_of_honey_can_we_trust_the_Pfund_scale_-_An_alternative_graphical_tool_covering_the_whole_visible_spectra, accessed April 19, 2022, p.7.

[56] USDA, AMS, p.5.

[57] Hasnul Hadi, M.H. et. al., "The Amber-Colored Liquid: A Review on the Color Standards, Methods of Detection, Issues and Recommendations, *Sensors 2021*, 21, 6866, https://doi.org/10.3390/s21206866, accessed April 19, 2022, p.2; Bodor, Zsanett et. al., "Colour of Honey: Can We Trust the Pfund Scale?" *LWT–Food Science and Technology*, 149 (2021) 111859, https://www.researchgate.net/publication/352154739_Colour_of_honey_can_we_trust_the_Pfund_scale_-_An_alternative_graphical_tool_covering_the_whole_visible_spectra, accessed April 19, 2022, p.1.

The Pfund Scale is a commonly used visual technique for evaluating the color of honey and is used to differentiate honey color into seven categories in the USDA honey color system (table I-7). The Pfund system expresses color intensity in millimeters (mm) with an arbitrary range from 1 mm, being the lightest color, to 140 mm being the darkest color.[58] The method has been criticized for (1) variation among devices due to scale limitations, (2) less sensitivity to detect slight differences between samples, and (3) some samples being outside of the device's color range.[59]

Table I-7
Raw honey: USDA Color Designations of Extracted Honey

USDA Color Standards Designations	Color Range USDA Color Standards	Color Range Pfund Scales Millimeters*	Optical Density*
Water White	Honey that is Water White or lighter in color	8 or less	0.0945
Extra White	Honey that is darker than Water White, but not darker than Extra White in color	Over 8 to and including 17	0.189
White	Honey that is darker than Extra White, but not darker than White in color	Over 17 to and including 34	0.378
Extra Light Amber	Honey that is darker than White, but not darker than Extra Light Amber in color	Over 34 to and including 50	0.595
Light Amber	Honey that is darker than Extra Light Amber, but not darker the Light Amber in color	Over 50 to and including 85	1.389
Amber	Honey that is darker than Light Amber, but not darker than Amber in color	Over 85 to and including 114	3.008
Dark Amber	Honey that is darker than Amber in color	Over 114	n/a

Source: USDA, AMS, "United States Standards for Grades of Extracted Honey," May 23, 1985.

Note: Optical Density (absorbance) = $\log_{10}$ (100/percent transmittance), at 560 nm for 3.15 cm thickness for caramel-glycerin solutions measured versus an equal cell containing glycerin.

[58] The measuring device consists of an amber-colored glass wedge and a wedge-shaped cell to hold the honey sample. The millimeters unit is the distance that the wedge must be moved for the color of the sample to match the color scale. Hasnul Hadi, M.H. et. al., "The Amber-Colored Liquid: A Review on the Color Standards, Methods of Detection, Issues and Recommendations, *Sensors 2021*, 21, 6866, https://doi.org/10.3390/s21206866, accessed April 19, 2022, p.7.

[59] Hasnul Hadi, M.H. et. al., "The Amber-Colored Liquid: A Review on the Color Standards, Methods of Detection, Issues and Recommendations, *Sensors 2021*, 21, 6866, https://doi.org/10.3390/s21206866, accessed April 19, 2022, p.2; Bodor, Zsanett et. al., "Colour of Honey: Can We Trust the Pfund Scale?" *LWT–Food Science and Technology*, 149 (2021) 111859, https://www.researchgate.net/publication/352154739_Colour_of_honey_can_we_trust_the_Pfund_scale_-_An_alternative_graphical_tool_covering_the_whole_visible_spectra, accessed April 19, 2022, p.1.

Generally, light-colored honey is milder in taste and dark-colored honey is stronger in taste.[60] In addition, selected floral sources are associated with lighter or darker colors.[61] For example, alfalfa honey is light in color with a mild flavor and aroma, whereas buckwheat honey is dark in color with a full-bodied flavor.[62] Economic research as early as 1998 demonstrated that consumers were willing to pay premiums for selected honey characteristics. Though this research did not specifically evaluate premiums associated with color, it found that consumers were willing to pay a 65 percent higher price for characteristics associated with unique floral sources.[63]

While many different types of honey are packaged and available for retail sale, most honey, especially honey supplied in bulk, is blended to create a unique and consistent taste and color.[64] Moreover, blended honey is often used as a generic ingredient in manufactured food products where many of honey's characteristics, including floral source and color, become unobservable to the final consumer.

[60] National Honey Board, "Honey Color and Flavor," https://honey.com/newsroom/presskit/honey-color-and-flavor, accessed April 19, 2022.

[61] National Honey Board, "Honey Color and Flavor," https://honey.com/newsroom/presskit/honey-color-and-flavor, accessed April 19, 2022.

[62] National Honey Board, "Honey Color and Flavor," https://honey.com/newsroom/presskit/honey-color-and-flavor, accessed April 19, 2022.

[63] Unnevenhr, Laurian J., and Fatoumata C. Gouzou, "Retail Premiums for Honey Characteristics," *Agribusiness,* Vol. 14, No. 1, January/February 1998, https://web.s.ebscohost.com/ehost/detail/detail?vid=2&sid=ca95adb2-27c7-4962-8844-ef4b6224b7d0%40redis&bdata=JnNpdGU9ZWhvc3QtbGl2ZQ%3d%3d#AN=782426&db=bth, accessed April 19, 2021, p.54.

[64] National Honey Board, "Honey Color and Flavor," https://honey.com/newsroom/presskit/honey-color-and-flavor, accessed April 19, 2022.

Organic honey[65]

Organic honey production in the United States is limited by several factors, including the fact that the National Organic Program ("NOP") has not adopted specific organic standards for apiculture, including beekeeping and honey production.[66] For honey sold in the United States to bear the USDA Organic Seal, producers and handlers must be certified according to NOP standards. Though organic standards for apiculture were recommended by the National Organic Standards Board ("NOSB") at their fall meeting in 2001 and again in the fall of 2010, these standards were not adopted by the NOP.[67] Thus, producers that receive USDA organic certification typically do so by using other standards; as bees meet the definition of livestock, organic certifiers have been using existing livestock standards as a baseline for certifying organic apiculture operations in the United States.[68]

A second factor limiting organic honey production in the United States is the concept of an organic forage zone. Foraging honeybees must visit about 5 million flowers to produce a pint

[65] In its preliminary determination, the Commission stated it would seek additional information regarding organic honey, including its role in the U.S. market, standards for the organic designation, and the degree of competition between organic and conventional raw honey. Thus, this section has been expanded substantially from the preliminary phase report. *Preliminary publication, p. 30.*

[66] The National Organic Program ("NOP") is a federal regulatory program that develops and enforces consistent national standards for organically produced agricultural products sold in the United States. NOP also accredits third-party organizations to certify that farms and businesses meet the national organic standards. These certifiers and USDA work together to enforce the standards, ensuring a level playing field for producers and protecting consumer confidence in the integrity of the USDA Organic Seal. USDA, AMS, "National Organic Program," https://www.ams.usda.gov/about-ams/programs-offices/national-organic-program, accessed March 2, 2022.

[67] Producers and handlers that knowingly label or sell a product as "organic" except in accordance with the Organic Foods Product Act of 1990 or NOP standards are subject to a maximum fine of $18,730 for each violation. 7 CFR § 3.91 (b) (1) (xxxvi); USDA, AMS, "The Organic Seal," https://www.ams.usda.gov/rules-regulations/organic/organic-seal, accessed March 2, 2022.The NOSB "Recommendations Library" currently classifies the rulemaking for apiculture standards as "closed," and notes that the proposed rule was not published and that consideration of the proposed rule is not on the Regulatory Agenda; USDA, NOSB, "NOSB Recommendations" https://www.ams.usda.gov/sites/default/files/media/NOSBRecommendationsLibrary.pdf, accessed March 1, 2022; USDA, NOSB, "NOSB Recommendations: Fall 2010," https://www.ams.usda.gov/sites/default/files/media/NOP%20Livestock%20Final%20Rec%20Apiculture.pdf, accessed March 1, 2022; USDA, NOSB, "NOSB Recommendations: Fall 2001," https://www.ams.usda.gov/sites/default/files/media/Rec%20Apiculture%20Standards.pdf, accessed March 1, 2022.

[68] USDA, NOSB, "NOSB Recommendations: Fall 2010," https://www.ams.usda.gov/sites/default/files/media/NOP%20Livestock%20Final%20Rec%20Apiculture.pdf, accessed March 1, 2022, p. 3.

of honey; while bees may fly up to 5 miles per day to collect food, most search within a one- to two-mile radius of the hive.[69] Organic certification standards in the European Union ("EU") and Canada define an organic forage zone to be a 3-kilometer or 1.8-mile radius around the apiary.[70] According to EU rules, for an apiary to be certified as organic, the organic forage zone must be predominately covered by natural vegetation or organically managed land which is especially relevant when bees will be visiting field crops or orchards to collect pollen.[71]

The difficulty of establishing and maintaining commercially sized, certified organic beekeeping operations in the contiguous United States can be demonstrated by considering the interdependence between forage conditions in North Dakota ("ND")—the number one honey-producing state—and California ("CA")—the number one state for pollination services demand. A 1.8-mile (3-km) radius organic forage zone encompasses about 10 square miles or about 6,515 acres. At this rate, the certified organic farmland in ND in 2019 could have supported about 725 organic bee colonies.[72] Conservation Reserve Program ("CRP") land is concentrated

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[69] Blake, Cary, "Better Understanding of Honey Bees Benefits Everyone," *Western Farm Press,* November 19, 2016, pp. 6-7.

[70] The standards proposed by the NOSB attempted to harmonize requirements for an organic forage zone, organic surveillance zone, and organic transition period with EU and Canadian organic apiculture standards and thus proposed the same 1.8-mile or 3-kilometer radius. As a major exporter of organic honey, including to the European Union ("EU"), organic apiaries in Brazil are generally certified to EU standards. USDA, NOSB, "NOSB Recommendations: Fall 2010," https://www.ams.usda.gov/sites/default/files/media/NOP%20Livestock%20Final%20Rec%20Apiculture.pdf, accessed March 1, 2022, p. 3.

[71] Similarly in the United States, for apiculture certification inspections, NOP expects organic certifiers to (1) completely review and understand the management of organic forage zones; (2) verify that organic forage zones are organically managed, i.e., contain wild areas or only certified organic crops; and (3) inspect all forage areas to ensure that all bee forage is organically managed. Certified organic crops must be produced without the use of genetically engineered inputs, thus, certified organic honey would also be considered to be non-GMO. USDA, AMS, NOP, "Organic Regulations Standards Update," February 10, 2015.

[72] North Dakota requires that beekeepers annually register the locations of their apiaries. The most recent registration list included at least 15,000 registered locations (505 pages with at least 30 locations per page). USDA's 2019 organic census reported a total of about 71,000 acres of organically certified farmland in ND. At 6,515 acres per forage zone, assuming a 50 percent overlap, the organic farmland in ND—assuming it were contiguous—would accommodate about 22 organic forage zones. The average number of colonies per location in ND during July and September 2018—2020 was about 34. Thus, certified organic farmland in ND could, theoretically, accommodate up to 726 organic colonies. USDA, AMS, NOP, "Organic Regulations Standards Update," February 10, 2015; North Dakota Department of Agriculture, *List of Registered Locations in North Dakota*, Apiary (Honey Bees), https://www.nd.gov/ndda/plant-industries/apiary-honey-bees, accessed March 7, 2022; USDA, NASS, Quick Stats Database, accessed March 7, 2022.

in the Northern Great Plains, including ND, and could potentially offer additional locations meeting requirements to be certified as organic forage areas.[73] However, most commercial beekeeping operations that produce honey in the Northern Great Plains also participate in the almond pollination services market in California, where, unfortunately, the total organic almond acreage harvested in 2019 would have been insufficient to establish even one certified organic forage zone.[74] Consequently, bee colonies that are located in ND to produce honey during the summer and are transported to California to provide pollination services would not meet certification requirements for organic production. Thus, organic honey production in the United States—outside of four certified organic operations identified in Hawaii[75]—is likely limited to beekeepers selling less than $5,000 worth of organic honey directly to consumers because the exemption does not allow this self-certified honey to be used as an ingredient in a

[73] The CRP gives farmers incentives to take sensitive land out of agricultural production and plant species that improve environmental quality, including bee forage. Thus, beekeepers actively target CRP land to locate apiaries for their abundant floral resources and lack of pesticide exposure. Bond, Jennifer K. et. al., *Honey Bees on the Move: From Pollination to Honey Production and Back*, USDA, ERS, Economic Research Report Number 290, June 2021, pp. 1-2. Crops are not actively harvested and sold from CRP acres; therefore, owners have no incentive to seek organic certification of CRP acres. Nonetheless, CRP acres could potentially qualify as organic bee forage areas depending on active management practices. Midwest Organic and Sustainable Education Service (MOSES), "Converting CRP Land to Organic Production," https://mosesorganic.org/publications/organic-fact-sheets/, accessed March 7, 2022.

[74] The 2019 organic census reported that there were 5,915 acres of organic almonds harvested in California. USDA, NASS, Quick Stats Database, accessed March 7, 2022.

[75] A search of USDA's Organic Integrity Database (OID) for certified organic operations that included "bees" certified under NOP livestock standards identified four operations in the United States that held organic certificates for bees based on NOP livestock standards. All four of these operations are based in Hawaii and are also certified as handlers of organic honey. Searching for operations that are certified to handle organic honey is less precise. A search based on "raw honey" identified 86 records, while a search including just "honey" identified 888 records; likely because this includes any certified organic product (e.g., bread) that has honey as an ingredient. USDA, OID, https://organic.ams.usda.gov/integrity/SAearch.aspx. Additional internet searches revealed that all four Hawaiian operations generally produce and package their honey for local distribution and online sales. Captain Cook Honey (a.k.a. Big Island Bees) states on their web site that they operate about 2,500 hives, based on USDA average production during 2018-20 this producer would account for about 14 percent of all honey produced in Hawaii (240,000 of 1.663 million pounds). Big Island Bees, Raw & Organic Honey, https://bigislandbees.com/ (accessed May 24, 2021); Hawaii Harvest Honey, https://www.hawaiiharvesthoney.com/ (accessed May 24, 2021); Pu'U O Hoku Ranch, https://puuohoku.com/ (accessed May 24, 2021); Rare Hawaiian Honey Company (a.k.a., Volcano Island Honey Company), https://www.rarehawaiianhoney.com/contact-us/ (accessed May 24, 2021).

processed product produced and sold by another certified organic production or handling operation.[76]

Imported organic honey must also comply with NOP standards. The EU is among the world's largest importers of honey; thus, the EU standards are the basis for certification of most of the organic honey in the world and beekeepers and honey producers in Latin America are familiar with the EU standards. The primary difference between EU organic standards and U.S. NOP livestock standards as they are applied to bees and honey are the use of two pest control products for control of *Varroa* mites. These two products are certified for use under the EU standards but are not certified for use under U.S. NOP standards. Hence, bees and honey that meet EU standards for organic certification are generally certified to meet U.S. NOP standards by confirming that these two methods of *Varroa* mite control have not been applied.[77] A search of the USDA OID identified 149 operations in the subject countries with a certification for livestock and handling that included bees or honey; of these, 52 were in Brazil and 89 were in Argentina.[78]

By regulation, all certified organic honey is non-GMO; however, conventionally produced honey may also be certified as non-GMO. Nonetheless, the production of conventionally certified non-GMO honey in the United States appears to be limited as most sellers certified to label their honey with the Non-GMO Project's logo appear to be sourcing honey from foreign sources, including both subject and non-subject countries.[79]

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[76] A production or handling operation that sells agricultural products as "organic" but whose gross agricultural income from organic sales totals $5,000 or less annually is exempt from certification under subpart E of this part and from submitting an organic system plan for acceptance or approval under § 205.201 but must comply with the applicable organic production and handling requirements of subpart C of this part and the labeling requirements of § 205.310. The products from such operations shall not be used as ingredients identified as organic in processed products produced by another handling operation; thus, organic beekeeping operations with less than $5,000 gross annual organic sales are exempt from obtaining organic certification prior to making an organic claim. 7 CFR § 205.101 (a)(1). See also USDA, AMS, "What farms and businesses are exempt from organic certification?," https://www.ams.usda.gov/sites/default/files/media/2%20Exempt%20Producers%20FINAL%20RGK%20V2.pdf, accessed March 7, 2022.

[77] Staff email correspondence, Garth Kahl, International Organic Inspectors Association ("IOIA") Accredited Inspector, Independent Organic Services, Inc., EDIS Document 768824.

[78] USDA, OID, https://organic.ams.usda.gov/integrity/SAearch.aspx.

[79] Conference Transcript, (Foott) pp. 155–156; NON-GMO Project, verified products database, https://www.nongmoproject.org/find-non-gmo/verified-products/?brand_id=12975, accessed March 21, 2022.

Honey classification

Honey, regardless of its country of origin, is generally classified by its individual characteristics (e.g., floral source, color, season, physical state, and means of preparation).[80] There are over 300 unique varieties of honey that are produced in the United States, differing in flavor and color.[81] Honey may be classified as monofloral (i.e., the nectar is primarily extracted from a specific blossom type) or polyfloral (i.e., the nectar is extracted from multiple botanical sources, with no single predominant floral source). The floral source gives honey its distinctive flavor (e.g., wildflower, orange blossom, alfalfa, clover, and buckwheat) and color (e.g., white and dark amber). Generally, lighter-colored honeys (e.g., clover honey) possess a milder flavor, while darker-colored honeys (e.g., buckwheat honey) possess a stronger flavor.

In bulk applications, honey is primarily valued based on floral source and color, and in the United States the light-colored and milder-tasting honeys are considered to be more valuable based on consumer preferences. While many varieties of honey exist on the market, most honey is blended to achieve a desired color and flavor,[82] as well as to provide a uniform product throughout a given market and/or to lower costs.

Most natural honey produced in the United States is marketed in liquid form, which is honey that is extracted from the comb by centrifugal force, gravity, or straining. Natural honey is also marketed as cream honey (also called "creamed," "whipped," or "spun"), which consists of pure honey in which dextrose crystallization has been encouraged; comb honey, which is honey marketed in the beeswax comb, both of which are edible; cut comb honey, which is liquid honey that has been packaged with chunks of honey comb; and dry honey (also known as "dried" or "powdered"), which is made by removing the water found in liquid honey by drum or spray-drying.[83] As a sweetener, honey appears in a variety of products such as bread and other baked goods, cereal, condiments, and candy. Non-food applications for honey include use in pharmaceutical products, and non-food processed products including as an input in hair care products. Honey also contains mild antiseptic properties when used on the skin.

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[80] *The Hive and the Honey Bee*, Dadant & Sons, Inc., Hamilton, IL, 1992, p. 869.

[81] National Honey Board, Honey Varietals, https://honey.com/about-honey/honey-varietals.

[82] National Honey Board, Honey Varietals, https://honey.com/about-honey/honey-varietals, (accessed May 24, 2021).

[83] National Honey Board, "Definition of Honey and Honey Products," Updated September 27, 2003, https://honey.com/images/files/Honey-Definitions.pdf (accessed May 24, 2021).

Other forms of honey and honey substitutes

The term "artificial honey," as defined in the explanatory notes to the HTS, applies to mixtures based on sucrose, glucose, or invert sugar, generally flavored or colored and prepared to imitate natural honey. Artificial honey could include a variety of products such as honey mixed with refined sugar, high fructose corn syrup, and other sweeteners. Artificial honey mixtures of natural and artificial honey are not included in the scope of these investigations. Artificial honey exists in relatively small amounts in the U.S. market and is supplied by both foreign and domestic producers.

Flavored honey, like artificial honey, is outside the scope of these investigations. Flavored honey is most likely sold as a specialty product for retail consumption and not for industrial use.

Manufacturing processes

Honey is produced in a beehive by a colony of honeybees. A typical colony of commercial honeybees in the United States contains one queen, 500 to 1,000 drones (male bees without stingers whose single purpose is to mate with the queen), and approximately 40,000 to 60,000 workers (female bees that perform the work of the colony including cleaning the nursery, caring for larvae, collecting nectar, making wax, and guarding and cooling the hive). The beehive is a series of combs composed of hexagonal cells that are made from wax produced in the stomach of the worker bees. The wax cells are used for storage. The worker bees naturally construct a core nest where the brood[84] are stored and then create a layer of insulation above the nest consisting of pollen and honey.

The production of honey begins with the bees gathering nectar from various plants. Bees may forage for several miles from their hive to find nectar.[85] Each bee may make several trips for nectar per day, weather permitting. Upon returning to the hive, the bee regurgitates the nectar into the mouth of a specialized "house" bee. The house bee adds enzymes and places the unripe honey into the hexagonal cells of the comb. The unripe honey is often spread among several cells to help in moisture evaporation, which the house bees promote by fanning their wings. Cells are then capped with a thin layer of wax, and the honey is allowed to ripen.

[84] The young and immature honeybees are collectively called brood.

[85] The EU standard for organic honey is based on a 3.0-kilometer (1.8-mile) radius of the hive. Staff email correspondence, Garth Kahl, IOIA Accredited Inspector, Independent Organic Services, Inc.

U.S. beekeeper operations

Beekeepers maintain bee colonies and extract honey from them. United States commercial beekeeping operations are often migratory with migratory patterns driven by the provision of pollination services (valued at $250 million to $320 million annually, 80 percent from California almonds); the search for forage to produce honey (valued at about $330 million annually); and the need to enhance colony survival and growth.[86] In the United States, it has been estimated that approximately two-thirds of all commercial colonies are on the road each year to pollinate crops and to produce honey and beeswax.[87] These migration patterns are dominated by movement from all other regions of the United States to California for the almond pollination season during February and March.[88] Colonies then disperse to other regions and states to provide pollination services for other fruit and vegetable crops, such as melons that require pollination to produce fruit, and other crops such as tomatoes, apples, blueberries, cherries, and canola where bee pollination increases yields and can improve quality.[89] Finally, many colonies travel to the Northern Great Plains in the summer for access to superior forage to focus on honey production.[90]

Beekeepers in the United States keep their bees in constructed wooden hives that are relatively easy to transport. Hives are often placed on wooden pallets for ease of handling by forklifts. Bees live in the core nest of beekeepers' artificially constructed hives and store the honey, intended to serve as food for the colony, in wooden frames known as "supers." To prevent the queen from laying brood in the supers containing the honey, beekeepers place an "excluder" between the lower core nest and the supers above. Worker bees produce more honey than required for use by the colony, so the excess honey can be harvested without harming the colony.

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[86] Bond, Jennifer K. et. al., *Honey Bees on the Move: From Pollination to Honey Production and Back,* USDA, ERS, Economic Research Report Number 290, June 2021.

[87] Pollination Facts, American Beekeeping Federation, https://www.abfnet.org/page/PollinatorFacts June 14, 2016; Bond, Jennifer K. et. al., *Honey Bees on the Move: From Pollination to Honey Production and Back,* USDA, ERS, Economic Research Report Number 290, June 2021, p.4.

[88] Bond, Jennifer K. et. al., *Honey Bees on the Move: From Pollination to Honey Production and Back,* USDA, ERS, Economic Research Report Number 290, June 2021.

[89] Bond, Jennifer K. et. al., *Honey Bees on the Move: From Pollination to Honey Production and Back,* USDA, ERS, Economic Research Report Number 290, June 2021, p.1.

[90] Bond, Jennifer K. et. al., *Honey Bees on the Move: From Pollination to Honey Production and Back,* USDA, ERS, Economic Research Report Number 290, June 2021.

Honey is harvested by driving the bees out of the super down into the core nest via smoke, chemicals, or low-pressure air. Then the wooden frames contained in the super are removed from the hive. The frames are removed when the honeycomb cells are fully capped with wax, which ensures that the honey is fully ripened and free of excess water. After removal of the frames, almost all honey is extracted from the combs, although some remains in the form of "comb" or "chunk" honey.

The liquid honey is exposed by "uncapping" the combs–removing the wax capping that covers the honeycomb frames. Combs are uncapped using either hot knives or power uncappers. The wax from caps is used for the production of beeswax foundation and the sale of beeswax for candles and other uses. Any remaining honey left in the caps is separated via centrifugal force by a wax spinner or mechanically squeezed out by a cap compressing system. Separation of honey from the uncapped cells is done by an "extractor" (a centrifuge, a.k.a. wax spinner). The uncapped frames are placed in the extractor where the honey is spun out of the comb. As honey flows from the extractor, it contains particles of wax, bees, and other hive matter.

After being extracted from the comb, honey may be strained to remove the largest particles of wax, propolis, bees and bee parts and other hive matter. Honey strainers are available in a wide range of mesh sizes, from 200 microns to 1,875 microns.[91] Standard sizes widely available to small beekeepers include 200-, 400- and 600-micron strainers.[92] Straining does not typically involve the direct application of heat or pressure to the honey, though beekeepers may keep processing areas at higher ambient temperatures to facilitate gravitational flow of honey. Commercial honey filters typically apply heat and pressure via pumps to filter honey more efficiently through screens and filters of less than 200 microns.[93]

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[91] Foxhound Bee Company, "Does Filtering or Straining Honey Remove Pollen from Honey," https://blog.foxhoundbeecompany.com/does-filtering-or-straining-honey-remove-pollen-from-honey/, accessed April 20, 2022.

[92] Foxhound Bee Company, "Does Filtering or Straining Honey Remove Pollen from Honey," https://blog.foxhoundbeecompany.com/does-filtering-or-straining-honey-remove-pollen-from-honey/, accessed April 20, 2022.

[93] Russell Finex, "Filtering Liquid Honey," https://www.russellfinex.com/en/industries/food-and-beverage/filtering-honey/, accessed April 20, 2022; Alibaba.com, Honey Processing Machines, https://www.alibaba.com/product-detail/Honey-Filtering-Equipment-1-Ton-Honey_1600478438961.html?spm=a2700.7724857.topad_creative.d_title.10e83838Tpa6Sz, accessed April 20, 2022.

After straining, the honey is still considered "raw" or "unprocessed." It is then either placed in large drums and transported to an independent packer for further processing; further processed by beekeeper-packers and bottled for local sale; or left in its raw form and bottled by the beekeeper for local sale.

Virtually all U.S. packers of honey are either beekeeper-packers, which are keepers of bee colonies that extract honey from those colonies and then process or pack the honey, or independent packers that purchase honey and then process or pack that honey. A few packers are both beekeeper-packers and independent packers, but even these firms are predominantly one or the other. In addition, SHA is operated on a cooperative basis to process, pack, and market honey for its beekeeper members.

Once individual beekeepers sell their honey to packers, blending is inevitable as packers are also consolidators and combine honey from many beekeepers based on selected characteristics, such as color or floral source. Selected varieties of honey, such as higher value monofloral sources, may be segregated to take advantage of consumer preferences that exist in the market; for example, orange blossom honey. However, most honey, especially bulk honey to be used as an ingredient, is blended to achieve a desired color and flavor,[94] as well as to provide a uniform product throughout a given market and/or to lower costs.

[94] National Honey Board, Honey Varietals, https://honey.com/about-honey/honey-varietals, (accessed May 24, 2021).

Colony Collapse Disorder

In 2006, significant changes to the overwinter survivability of European honeybees occurred in North America; this phenomenon has become known as Colony Collapse Disorder (or "CCD").[95] CCD is characterized by an unexplained rapid loss of a colony's adult population, while the queen, a small number of young workers, the brood, and food stores remain in the hive.[96] Before 2006, estimates of overwinter loss rates in the United States ranged from 15 to 23 percent, and as low as 10 percent before the arrival of the honeybee mites *Acarapis woodi* and *Varroa destructor* in the mid-1980s.[97] After the identification of CCD from 2006 to 2014, estimates of overwinter loss rates range from 23 percent to 36 percent.

Underwood and van Engelsdrop argue that CCD is not a new condition, having identified descriptions and documentation of about 20 large-scale colony loss episodes, many with similar symptoms to CCD, since 1869.[98] While research into the specific cause of CCD is ongoing, the current dominant theory is that CCD is caused by multiple factors and cannot be explained by a single causal agent.[99]

Thus, commercial beekeepers had experience in replacing lost hives even prior to CCD. One of the primary methods of replacing lost hives involves splitting a healthy, full-strength, hive into two parts. The beekeeper will move a portion (typically less than 50 percent) of the brood and adult bees from a healthy hive to a new hive known as nuclei colonies ("nucs" or "splits"). A new fertilized queen (purchased from commercial queen breeders) is added to the new hive, though the new hive may be allowed to produce their own queens. A second method

[95] Underwood and van Engelsdorp documented nearly 20 episodes of major colony losses in the United States since the late 1860s.

[96] Underwood, Robyn, and Dennis van Engelsdorp, "Colony Collapse Disorder: Have We Seen This Before?" January 2007, https://www.researchgate.net/publication/235257051_Colony_Collapse_Disorder_Have_we_seen_this_before, accessed March 14, 2022.

[97] Rucker, Randal R. et. al., "Colony Collapse and the Economic Consequences of Bee Disease," North Carolina Center for Environmental and Resource Policy, January 2016, pp. 6–7.

[98] Underwood, Robyn, and Dennis van Engelsdorp, "Colony Collapse Disorder: Have We Seen This Before?" January 2007, https://www.researchgate.net/publication/235257051_Colony_Collapse_Disorder_Have_we_seen_this_before, accessed March 14, 2022.

[99] Rucker, Randal R. et. al., "Colony Collapse and the Economic Consequences of Bee Disease," North Carolina Center for Environmental and Resource Policy, January 2016, p 9.

is to purchase packaged bees, roughly 12,000 workers and a fertilized queen, typically from the same commercial breeders that produce fertilized queens.[100]

In contrast to much of the literature and media reports concerning CCD, an economic analysis by Rucker et. al. found that the impact of CCD on honey production, input prices, and bee colony numbers was small or not measurable based on the data available in 2016.[101] The largest measurable impact they found was on the pollination fees for almonds in California, with relatively smaller impacts on the pollination fees for early cherries and plums in California.

[100] Rucker, Randal R. et. al., "Colony Collapse and the Economic Consequences of Bee Disease," North Carolina Center for Environmental and Resource Policy, January 2016, pp. 10–11.

[101] Rucker, Randal R. et. al., "Colony Collapse and the Economic Consequences of Bee Disease," North Carolina Center for Environmental and Resource Policy, January 2016, p. 3.

Domestic like product issues

The petitioners proposed in the preliminary phase of these investigations that the Commission should define a single domestic like product coextensive with the scope of these investigations. The scope does not cover processed honey that has been heated, filtered, or otherwise processed and packaged for retail, food service or industrial use by honey packers. Nor does the scope include raw honey packaged for retail sale. Instead, the scope covers raw honey in the form it is produced by beekeepers.

In the preliminary phase of these investigations the Commission defined the domestic like product to be coextensive with the scope of the investigations. It rejected Respondents' arguments that the Commission define the domestic like product more broadly to include out-of-scope processed honey or out-of-scope raw honey packaged for retail sale in its definition. It indicated that it would gather additional information concerning raw honey packaged for retail sale in any final phase investigations.[102]

Appendix D contains numeric and narrative responses summarizing U.S. producers', U.S. importers', and purchasers' responses to questions about the Commission's six-factor domestic like product analysis comparing in-scope raw honey to raw honey packaged for retail sale. A significant majority of domestic producers said the products were never interchangeable, while importers were more likely to say fully or mostly on most factors, and purchasers were divided. Respondents have not raised any arguments concerning the definition of the domestic like product in the final phase of these investigations.

[102] Preliminary publication, pp. 10-14.

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

U.S. market characteristics

Raw honey is sold by beekeepers and importers primarily in 55-gallon drums to packers but is also sold in larger totes and bulk tankers to end users and may be blended.[1] Packers, in turn, sell processed honey to retailers, to the food service industry, and to industrial customers as a bulk food ingredient.[2] Raw honey is typically categorized by color (white, extra light amber, amber, or dark amber), origin, and floral source.[3] Lighter colored and mildly flavored honey typically receives a higher price than darker and strongly favored honey.[4] Shipments from different country sources tended to be concentrated in particular colors, with a majority of U.S. producer and Argentine shipments being white and extra light amber; Indian and Ukrainian shipments being mostly of extra light and light amber; and Brazilian and Vietnamese shipments being mostly of light amber or amber colors (see Part IV). In addition, most shipments from Brazil were organic honey.[5]

Over 200 U.S. beekeepers are members of Sioux Honey Association ("SHA") cooperative ("co-op"), which has packing operations in California, Iowa, and North Carolina.[6] Member beekeepers are required to transfer the vast majority of their honey production to the cooperative at a price set by the co-op and receive a share of the proceeds through several installments throughout the year. SHA also processes imported honey.[7] Large independent U.S. packers and/or processors include ***; these firms purchase honey from a variety of domestic and import sources.

Seven of 47 U.S. producers and 12 of 23 importers reported changes to the product mix or marketing of raw honey since January 1, 2018. Among firms reporting changes, U.S. producers reported lower market prices, more imported product, more blending by packers of

[1] Purchasers' prehearing written statement, p. 12.

[2] Petition, pp. 10, 17, Exhibit GEN-1; Conference transcript, pp. 13-14 (Luberda), p. 18 (Kendler), pp. 151-152 (Foott); NHPDA postconference brief, p. 10; Argentine postconference brief, p. 11.

[3] Petition, p. 10.

[4] Petition, p. 9. Respondents stated that darker honeys are preferred for their robust flavors in food ingredients, while lighter colored honeys are preferred by consumers in the retail market. Conference transcript, p. 149 (Stickevers), pp. 154, 159-160 (Foott); NHPDA postconference brief, pp. 21-22. Petitioners stated that honey of different colors may be blended and sold to different end uses. Petitioners' postconference brief, p. 23.

[5] See Part IV; Conference transcript, p. 125 (Hiatt). There is minimal production of organic honey in the United States.

[6] Petition, p. 10.

[7] Conference transcript, pp. 24-25 (Coy).

less-expensive foreign honey with domestic honey, increased demand for organic and non-GMO honey, and varieties such as orange blossom, and regional preferences ("such as 100 percent Texas"). Importers reported increased demand for organic honey and non-GMO honey; growth in demand for locally produced honey;[8] marketing of raw and unfiltered honey direct-to-consumers; an emphasis on varieties such as orange blossom, coffee, and clover; and new uses for honey such as in health food products, beers, snacks, and spirits. Several importers reported that the emphasis on local and regional honey has caused large increases in demand for raw honey from highly populated regions of the country and decreased demand for the clover varietal produced in the Dakotas and Montana.

Apparent U.S. consumption of raw honey fluctuated during 2018-20. Overall, apparent U.S. consumption in 2020 was 1.8 percent higher than in 2018. Apparent consumption was 15.2 percent higher in January-September 2021 than in January-September 2020.

U.S. purchasers

The Commission received 21 usable questionnaire responses from firms that had purchased raw honey during January 2018-September 2021.[9] [10] [11] Fifteen responding purchasers are packers/processors, four are end users that use raw honey as an ingredient (***),[12] one is a honey retailer (***), one is a distributor (***), and one is a trading firm (***). Most responding U.S. purchasers were located in the Midwest, although purchasers were represented throughout the contiguous United States. The responding purchasers represented firms in a variety of domestic industries, including honey processing and packing and end users

[8] Petitioners and respondents stated that demand for local honey is driven by retail end users rather than industrial food product end users. Conference transcript, p. 94 (Blumenthal), p. 154 (Foott).

[9] The following firms provided purchaser questionnaire responses: ***.

[10] Of the 21 responding purchasers, 16 purchased domestic raw honey, 10 purchased imports of the subject merchandise from Argentina, 17 from Brazil, 15 from India, and 16 from Vietnam.

[11] Nineteen purchasers indicated they had marketing/pricing knowledge of domestic product, 12 of raw honey from Argentina, 19 from Brazil, 17 from India, 18 from Vietnam, and 11 from nonsubject sources including Canada (8), Mexico (7), Uruguay (6), Thailand (4), Chile, China, New Zealand, Romania, Sierra Leone, Taiwan, and Turkey (1 each).

[12] Ingredient end users confirmed that the raw honey they purchased fell within scope because the products had not been filtered to a level that removes pollen to below 25 microns. See email from Douglas Heffner, counsel to General Mills, Bimbo Bakeries, Post Holdings, and Smithfield, April 15, 2022, EDIS Document 768676 and Purchasers' posthearing written statement, Answers to Commissioner Questions, pp. 19-22.

of honey in the production of food products. Large purchasers of raw honey include packers *** and ***. Purchasers reported that their customers include packers, retailers, food service companies, bakeries, and meat processors.

Responding purchasers also provided information regarding their top five suppliers and indicated that they purchase raw honey from a combination of U.S. beekeepers, U.S. packers, and importers.

Channels of distribution

Responding large U.S. producers[13] and importers reported that over half of their total U.S. shipments of domestically produced raw honey were commercial shipments to firms other than co-ops, including packers, processors, and end users (table II-1). Slightly over one-third of U.S. producers' shipments were to co-ops in 2020, which decreased from over half in 2018. A small share of U.S. producers' shipments were internally consumed (i.e., processed and packaged for retail sale). A majority of importers' U.S. shipments of raw honey from Argentina, Brazil, and India in 2020 were commercial shipments to firms other than co-ops, including packers, processors, and end users. Similarly, most U.S. shipments of raw honey from Vietnam were to firms other than co-ops, such as packers, processors, and end users, but a substantial share of shipments from Vietnam were internally consumed.

[13] Firms that produced raw honey using 3,800 colonies or more in the United States annually in 2018, 2019, or 2020 or using 3,800 colonies or more in Jan.-Sept. 2021.

Table II-1
Raw honey: Share of U.S. shipments by channel of distribution within source, by period

Shares in percent

Source	Channel	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
United States	Commercial: cooperatives	***	***	***	***	***
United States	Commercial: all other	***	***	***	***	***
United States	IC: retail packaging	***	***	***	***	***
United States	IC: all other	***	***	***	***	***
United States	Transfers	***	***	***	***	***
Argentina	Commercial: cooperatives	***	***	***	***	***
Argentina	Commercial: all other	***	***	***	***	***
Argentina	IC: retail packaging	***	***	***	***	***
Argentina	IC: all other	***	***	***	***	***
Argentina	Transfers	***	***	***	***	***
Brazil	Commercial: cooperatives	***	***	***	***	***
Brazil	Commercial: all other	***	***	***	***	***
Brazil	IC: retail packaging	***	***	***	***	***
Brazil	IC: all other	***	***	***	***	***
Brazil	Transfers	***	***	***	***	***
India	Commercial: cooperatives	***	***	***	***	***
India	Commercial: all other	***	***	***	***	***
India	IC: retail packaging	***	***	***	***	***
India	IC: all other	***	***	***	***	***
India	Transfers	***	***	***	***	***
Vietnam	Commercial: cooperatives	***	***	***	***	***
Vietnam	Commercial: all other	***	***	***	***	***
Vietnam	IC: retail packaging	***	***	***	***	***
Vietnam	IC: all other	***	***	***	***	***
Vietnam	Transfers	***	***	***	***	***
Subject sources	Commercial: cooperatives	***	***	***	***	***
Subject sources	Commercial: all other	***	***	***	***	***
Subject sources	IC: retail packaging	***	***	***	***	***
Subject sources	IC: all other	***	***	***	***	***
Subject sources	Transfers	***	***	***	***	***
Ukraine	Commercial: cooperatives	***	***	***	***	***
Ukraine	Commercial: all other	***	***	***	***	***
Ukraine	IC: retail packaging	***	***	***	***	***
Ukraine	IC: all other	***	***	***	***	***
Ukraine	Transfers	***	***	***	***	***
All import sources	Commercial: cooperatives	***	***	***	***	***
All import sources	Commercial: all other	***	***	***	***	***
All import sources	IC: retail packaging	***	***	***	***	***
All import sources	IC: all other	***	***	***	***	***
All import sources	Transfers	***	***	***	***	***

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. United States data reflect only large U.S. producers. IC = Internal consumption. Transfers are to related firms.

Geographic distribution

U.S. producers reported selling raw honey to all U.S. regions, with the Midwest the most frequently reported market (table II-2).[14] Importers reported selling to all markets in the contiguous United States. For U.S. producers, 2.4 percent of sales were within 100 miles of their production facility, 53.2 percent were between 101 and 1,000 miles, and 44.3 percent were over 1,000 miles. Importers sold 59.0 percent within 100 miles of their U.S. point of shipment, 33.0 percent between 101 and 1,000 miles, and 8.0 percent over 1,000 miles.

Table II-2
Raw honey: Count of U.S. producers' and U.S. importers' presence in geographic markets, by source and by region

Count in number of firms reporting

Region	U.S. producers	Argentina	Brazil	India	Vietnam	Subject sources	Ukraine
Northeast	10	9	10	6	6	12	4
Midwest	31	8	9	8	10	15	6
Southeast	8	10	5	7	9	13	2
Central Southwest	14	6	6	6	5	8	5
Mountains	14	2	5	2	1	9	2
Pacific Coast	15	5	6	4	4	7	3
Other	2	0	0	0	0	0	0
All regions (except Other)	2	1	2	1	0	3	1
Reporting firms	41	11	14	11	12	18	7

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

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

[14] Half of U.S. raw honey production in 2020 was in the Midwest (see Part III).

Supply and demand considerations

U.S. supply

Raw honey production is limited by the number of beehives, by crop and forage areas, and the challenges presented by Varroa mites, which carry bee viruses.[15] Since the nature of beekeeping is to produce as much honey from beehives as possible, beekeepers usually operate at full capacity and cannot increase production without increasing the number of hives they use. Additional capacity in the form of new hives can be added, and Petitioner estimated that it takes three to four months for a new hive to reach capacity.[16] Petitioner stated that capacity can be increased by buying more hives, splitting hives, purchasing more queens, and buying more land.[17] Honey can be stored in inventory for up to 20 years, but the quality of the honey may degrade.[18]

Table II-3 provides a summary of the factors affecting raw honey supply from domestic and subject producers. Production in the subject countries combined was much higher than production in the United States. Argentina had the highest production quantity among the individual subject countries in 2018 and 2020. Production yields per colony varied greatly among the countries, with Vietnam and Brazil having the highest yields and India the lowest yield. U.S. production was almost entirely consumed in the U.S. home market in 2020. Data from reporting firms in subject countries indicated that the U.S. market was also the largest market for each of the subject countries. Firms generally indicated a small share of shipments to their home market, except for India in 2020. Most reporting firms in the United States and subject countries reported that they are unable to shift production between raw honey and other products.

[15] Conference transcript, pp. 152-153 (Foott), p. 183 (Spak); Honey from China, Inv. No. TA-406-13, USITC Publication 2715, January 1994.

[16] Petitioner posthearing brief, Exh. 1 Answers to Commissioner Questions, p. 46.

[17] Hearing transcript, pp. 19, 31 (Hiatt, Rodenberg).

[18] Hearing transcript, p. 91 (Spears).

Table II-3
Raw honey: Supply factors that affect the ability to increase shipments to the U.S. market, by factor and by country

Quantity in 1,000 pounds; yield in pounds per colony; ratios in percent

Factor	Measure	United States	Argentina	Brazil	India	Vietnam	Subject suppliers
Production 2018	Quantity	154,008	175,197	93,185	137,121	45,007	450,510
Production 2020	Quantity	147,594	164,030	113,556	136,977	47,399	461,963
Production yield 2018	Yield	54.5	58.9	91.4	11.3	177.4	27.5
Production yield 2020	Yield	54.5	55.0	110.1	11.2	187.3	28.0
Ending inventories to total shipments 2018	Ratio	***	***	***	***	***	***
Ending inventories to total shipments 2020	Ratio	***	***	***	***	***	***
Home market 2020	Ratio	***	***	***	***	***	***
Non-U.S. export markets 2020	Ratio	***	***	***	***	***	***
Ability to shift production	Count	***	***	***	***	***	***

Source: Production and yield data are from USDA for the United States and from FAO for subject countries (see Parts III and VII). All other data are compiled from data submitted in response to Commission questionnaires.

Note: These data for the U.S. market include large U.S. producers only.

Note: Responding U.S. producers accounted for less than one-third of U.S. production of raw honey in 2020. Responding foreign producer/exporter firms accounted for almost all U.S. imports of raw honey from Argentina, more than 75 percent of imports from Brazil, all imports from India, and more than 75 percent of imports from Vietnam. 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 Part I, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of raw honey have the ability to respond to changes in demand with small changes in the quantity of shipments of U.S.-produced raw honey to the U.S. market. The main contributing factor to this degree of responsiveness of supply is increased inventories. Factors mitigating responsiveness of supply include decreased production, limited capacity and a limited ability to increase capacity in the short-term, an inability to shift shipments from alternate markets, and a limited ability to shift production to or from alternate products.

U.S. production declined and production yield did not change between 2018 and 2020. Most firms reported that they were unable to produce other products using the same equipment as raw honey. A few firms reported that they use the same labor for raw honey production, pollination services, mated queens, and wax.

Eleven of 20 responding purchasers reported that the availability of U.S.-produced raw honey had changed since 2018, citing increased demand with limited overall supply and

declining production. One *** purchaser *** indicated that demand for U.S. honey increased, but the available supply decreased, and another *** purchaser *** reported that it is forecasting a record low production in 2022 due to drought across many states. Purchaser *** reported that "while there has not been significant change in availability of raw honey… the United States only produces enough honey to satisfy demand for 25 percent of total U.S. consumption. That honey is sold through the highest margin channels in the market and meets retail consumer expectations of color and flavor."

Imports from subject countries

Based on available information, producers of raw honey in subject countries have the ability to respond to changes in demand with moderate changes in the quantity of shipments of raw honey to the U.S. market. The main contributing factors to this degree of responsiveness of supply are slightly increased overall production in subject countries and some ability for producers in subject countries to shift shipments from alternate markets. Factors mitigating responsiveness of supply include decreased production and a limited ability to shift production to or from alternate products.

Overall production in subject countries increased by 2.5 percent from 2018 to 2020. Production in Brazil increased by over 20 percent and production in Vietnam increased by approximately 5 percent, while production in Argentina decreased by 6 percent and production in India decreased by 0.1 percent. Production yield for combined subject sources remained constant. Production yield decreased for producers in Argentina and India (decreases less than 7 percent), while yields increased for Brazil (21 percent) and Vietnam (6 percent). Responding exporter/foreign producers reported that the U.S. market was their largest country market for all subject countries in 2020. Exports to third-country markets were a small share of shipments for India and Vietnam (less than 7 percent), a larger share for Argentina and Brazil (approximately 40 and 20 percent, respectively). Very few responding firms in subject countries reported being able to shift production from raw honey to other products.

Most U.S. purchasers reported that there were no changes in supply from subject sources since 2018. Some purchasers reported fluctuating availability of raw honey due to weather and harvest conditions both in the United States and in subject countries and COVID-related supply chain issues that affected availability.

Imports from nonsubject sources

Imports of raw honey from nonsubject sources accounted for 15.3 percent of total U.S. imports in 2020, a reduction from 21.9 percent in 2018.[19] The largest sources of imports from nonsubject sources during 2018-20 were New Zealand, Canada, and Mexico (in order of size). Combined, these countries accounted for approximately 43.7 percent of imports from nonsubject sources in 2020, by quantity.[20]

Supply constraints

Nearly all responding U.S. producers (43 of 46) and most responding importers (15 of 24) and purchasers (13 of 20) reported no supply constraints prior to the filing of the petition on April 21, 2021, although as noted previously, raw honey production is limited by certain capacity constraints (see "Domestic production"). Of the firms that reported experiencing supply constraints, U.S. producers reported being constrained by the production of their bees and adverse climate conditions. Importers reported experiencing shipment delays due to adverse climate conditions around the world, container shortages, labor shortages, and increased transport costs. Importer *** reported supply constraints resulting from insufficient quantities of orange blossom and mesquite honey from Texas and white and extra light amber honey from the northern Midwest. Purchasers primarily reported shipping delays and increased logistics costs. Purchaser *** reported several limitations on availability since 2020 including poor crop performance in the United States, and shipping delays and lockdowns in India and Vietnam.

When asked about supply constraints after the filing of the petition on April 21, 2021, 6 U.S. producers and 14 importers reported that they refused or declined to supply due to adverse climate conditions and increased logistics costs and delays. Fifteen of 20 responding purchasers reported being declined supply after the filing of the petition citing SHA's inability to supply dark amber honey, COVID-related disruptions such as logistics, labor shortages, and lockdowns, and uncertainty in the market resulting from the petition. Four purchasers reported that SHA declared a force majeure and was unable to fill orders in 2021.[21] Purchaser *** reported that following the filing of the petition, suppliers have been unable to provide reliable or consistent "forward" pricing which has led to supply constraints.

[19] Based on official statistics (see Part IV, table IV-2).

[20] Based on official statistics.

[21] Petitioner SHA stated that this was a short-term issue, not because of any market shortage of domestic or imported raw honey, but rather due to ***. Petitioner posthearing brief, Exh. 1 Answers to Commissioner Questions, p. 26.

New suppliers

Most purchasers reported that no new suppliers entered the U.S. market since January 1, 2018. Four of 21 purchasers indicated that new suppliers entered the market since January 1, 2018. Two purchasers, ***, reported Prairie Imports as a new supplier, and the remaining two purchasers reported that new suppliers regularly enter the market.

U.S. demand

Based on available information, the overall demand for raw honey and downstream products (processed honey and honey-sweetened food products) is likely to experience small changes in response to changes in price. The main contributing factors to the low degree of responsiveness of demand are the limited substitutability of honey with other sweeteners for both retail consumers and in the food service sector, and moderate end-use cost share as a food ingredient.

While U.S. production of honey has remained relatively steady, U.S. demand for honey has gradually increased over the past few decades.[22] During the preliminary phase of these investigations, petitioners and respondents stated that demand for honey in the retail sector had remained flat but strong, and that demand had increased in non-retail sectors.[23] This trend reflects growing health concerns regarding sugar and artificial sweeteners, resulting in a substitution towards natural sweeteners like honey.[24] Moreover, much of the consumer demand for honey is driven by its perceived health benefits, including its potential to combat local allergens and boost immunity.[25] These health benefits reportedly have contributed to increased demand in raw, local, and organic honey.[26] Fourteen of 20 responding purchasers reported that the demand for end uses of honey increased and the remaining 6 purchasers reported that the demand for end uses fluctuated. All responding purchasers reported that changes in the demand of end uses affected the demand for raw honey. Two purchasers

[22] USDA Economic Research Service, Food Availability (Per Capita) Data System, Sugar and sweeteners (added), https://www.ers.usda.gov/webdocs/DataFiles/50472/sugar.xls?v=1561.1, accessed March 10, 2022.

[23] Conference transcript, pp. 89-90 (Blumenthal, Mammen); Petitioners' postconference brief, pp. 15-16; NHPDA postconference brief, pp. 11-12.

[24] Conference transcript, p. 17 (Kendler); National Honey Board. "Market Research Overview," https://honey.com/honey-industry/research/market-research, accessed May 21, 2021.

[25] Healthline, "Honey for Allergies," https://www.healthline.com/health/allergies/honey-remedy, accessed May 21, 2021.

[26] NHPDA postconference brief, pp. 14-17.

specifically cited the increase in working and learning from home in the increased demand for end uses such as ***.

End uses and cost share

U.S. demand for raw honey depends on the demand for U.S.-produced downstream products as well as the demand for processed honey in the retail sector. Raw honey accounts for almost all of the cost of processed honey for retail but processed honey accounts for a small cost share of end-use products when used as an ingredient. Responding firms reported a wide range of reported cost shares for honey when used as an ingredient (ranging from 1 percent to 99 percent). Purchasers reporting specific end uses such as cereals, baked goods, ***, and ***, reported that raw honey accounted for less than 10 percent of the total cost. Most responding U.S. producers, importers, and purchasers reported that raw honey costs accounted for 70 percent or greater of total cost of honey sold for retail and used in food service, with some exceptions. [27] Approximately one-third of responding firms reported that 95 percent or more of total cost of honey sold for retail was attributed to raw honey.

Honey color and flavor

Firms were asked which colors of honey (white, extra light, light amber, or amber) could be used in retail, ingredient, and food service applications (table II-4). U.S. producers generally reported that all colors could be used for any application, although many producers acknowledged that generally lighter colored honeys are preferable in retail applications for the lighter and mellow taste. Importers and purchasers reported that certain colors tend to be used in certain applications. Specifically, most responding importers and purchasers reported that typically the darker colors of honey (light amber and amber) are used as ingredients, and that extra light or light amber honey is typically used in food service. Respondents stated that the world's market for darker honey falls in the light amber category and any prices for amber will follow those of light amber.[28]

Among purchasers, most packers reported that all four color types (white, extra light amber, light amber, and amber honey) could be used in retail end uses. Most packers and ingredient end users reported that light amber honey could be used in ingredient applications,

[27] Two U.S. producers reported that raw honey accounted for 14-40 percent of the total cost of honey sold for retail. Four importers reported that raw honey accounted for 20-69 percent and three purchasers reported that raw honey accounted for 60-69 percent of the total cost of honey sold for retail.

[28] Hearing transcript, pp. 222-23 (Nubern).

and most packers reported that extra light or light amber honey could be used in food service applications. Ingredient end user *** reported that "amber, inclusive of dark amber, honey characteristics are essential to ***" of *** and continued that although it uses extra light amber, light amber, and amber honeys, these are not interchangeable. Its use of a certain honey color is driven by "pre-established customer specifications that originated from floral selections for a specific taste profile. Purchaser *** stated that its honey color preference is limited ***."

Ingredient end users stated that their specifications and recipes do not change often: Bimbo Bakeries has not changed its specifications for over seven years, and General Mills and Post have not changed their formulations for 10 years.[29] General Mills and Post stated that only in extreme circumstances and cost increases would they risk changing their ingredients; these purchasers have continued to purchase amber honey from Vietnam despite the 400 percent provisional duty assessed during the preliminary determination.[30] Ingredient end users stated that flavor specifications can be more subjective than color, so while flavor profiles may not be spelled out in specifications, they may send samples to suppliers so that flavor can be matched, or will describe flavors, such as ***.[31] Petitioner SHA shared a sample flavor specification from ***.[32]

Petitioner stated that prices for one color influence prices of other colors, citing a study by the National Honey Board that stated that prices of white honey, extra light amber honey, and amber honey were correlated with values ranging between 0.98 and 0.99.[33] Respondent Impex stated that there is approximately a $50 per metric ton price difference between colors and that prices for the various colors generally move in tandem.[34]

[29] Hearing transcript, pp. 229, 231, 234 (Bertrand, Bash, Crown), Purchasers' posthearing written statement, Answers to Commissioner Questions, pp. 1-3.

[30] Purchasers' posthearing written statement, pp. 10-11.

[31] Purchasers' posthearing written statement, Answers to Commissioner Questions, pp. 5-7.

[32] Petitioner posthearing brief, p. 14.

[33] Petitioner posthearing brief, Exh. 1 Answers to Commissioner Questions, p. 16.

[34] Hearing transcript, pp. 274-54 (Martin).

Table II-4
Raw honey: Color of raw honey used in end use applications, by firm type and end use

Count in number of firms reporting

End use	Firm type	White	Extra light	Light amber	Amber
Retail	U.S. producers	30	32	34	24
Retail	Importers	17	17	11	1
Retail	Purchasers	14	14	10	2
Ingredients	U.S. producers	24	24	29	28
Ingredients	Importers	2	7	16	16
Ingredients	Purchasers	5	8	16	17
Food service	U.S. producers	26	27	29	27
Food service	Importers	4	11	16	4
Food service	Purchasers	5	10	12	7

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

U.S. producers, importers, and purchasers were also asked if the different colors of raw honey are interchangeable (i.e., can they physically be used in the same applications), shown in tables II-5 through II-7. The large majority of U.S. producers reported that all colors of raw honey can be used interchangeably, while the large majority importers and purchasers reported that different colors of honey may only sometimes or never be used interchangeably. Generally, importers and purchasers reported that end use applications and customer specifications constrain interchangeability of different colors. Colors on the opposite ends of the continuum (i.e., white raw honey compared to amber raw honey) have the least interchangeability according to importers and purchasers, but there is sometimes interchangeability between colors that are closer together on the spectrum (i.e., white compared to extra light amber, extra light amber compared to light amber, or light amber compared to amber).

Table II-5
Raw honey: Interchangeability between different colors of raw honey reported by U.S. producers, by color pair

Count in number of firms reporting

Color pair	Always	Frequently	Sometimes	Never
White vs. Extra light amber	35	5	4	1
White vs. Light amber	35	4	5	1
White vs. Amber	33	4	5	3
Extra light amber vs. Light amber	34	5	5	0
Extra light amber vs. Amber	33	4	6	1
Light amber vs. Amber	33	5	6	0

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

Table II-6
Raw honey: Interchangeability between different colors of raw honey reported by U.S. importers, by color pair

Count in number of firms reporting

Color pair	Always	Frequently	Sometimes	Never
White vs. Extra light amber	1	5	9	7
White vs. Light amber	1	0	7	14
White vs. Amber	0	0	1	21
Extra light amber vs. Light amber	1	4	13	3
Extra light amber vs. Amber	0	1	5	15
Light amber vs. Amber	1	4	7	9

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

Table II-7
Raw honey: Interchangeability between different colors of raw honey reported by U.S. purchasers, by color pair

Count in number of firms reporting

Color pair	Always	Frequently	Sometimes	Never
White vs. Extra light amber	2	1	13	3
White vs. Light amber	1	2	7	10
White vs. Amber	1	1	3	15
Extra light amber vs. Light amber	1	3	12	5
Extra light amber vs. Amber	1	1	5	14
Light amber vs. Amber	1	3	13	4

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

Purchaser *** stated that "Color rarely plays a role in our acceptance or rejection of a load of honey - unless it deviates a great deal from what we expect the floral to be (color range). The color may be part of our specifications, but they operate in ranges. These ranges are designed as an indirect way of assuring the quality of the honey, florals, and taste are met. We understand that certain florals will fall within a color range. The reason why it is sometimes interchangeable is that the underlying floral can straddle different color ranges." Purchaser Bimbo Bakeries stated that *** and added that it "uses light amber and amber honey as an industrial ingredient because of the color and flavor profiles enhanced during the Maillard reaction of our baking. The Maillard reaction between the amino acids in reducing sugars gives the browned food its distinctive flavor. White and extra-light amber honey do not impart the same distinctive browning and flavor."[35] Other purchasers stated that when colors are identified in customer specifications, different colors are never interchangeable. Importer and purchaser *** stated that "From a production standpoint, blending of different honey colors is acceptable as long as the color spec

[35] Transcript, pp. 195-96 (Bertrand).

of the final product is maintained {but that floral} source is the most important factor when evaluating the differences in honey. The nectar from the flower will impact color, moisture, sugar content, taste, aroma, and many other characteristics." Importer and purchaser *** reported that color interchangeability depends on the application, illustrating that a consumer wouldn't want to replace white honey with amber honey if putting on a biscuit, and that amber honey might be preferred to white honey when brewing a dark beer.

Petitioner stated that there is competition between colors and that customers are accepting a wider range of colors in both lighter and darker colors.[36]

Organic and conventional raw honey

Firms were also asked if end uses for organic and conventional raw honey differ. Most U.S. producers (39 of 44) reported that they did not, while most importers (19 of 21) and purchasers (16 of 20) reported that they did. Generally, firms reported that organic honey is required for any end use products that are marketed as organic. Organic honey is used in retail, food service and industrial segments, and according to importer ***, there are markets for organic raw honey in "all" segments. Organic raw honey may be used in conventional end uses, but conventional honey may not be used in any product that is certified organic.

Approximately 20 percent of U.S. shipments in 2020 were of organic raw honey (for more information see Part IV, table IV-11). Purchasers were asked to estimate the share of their purchases that were organic and other than organic in 2020, and to explain any preferences or specific end uses that require organic raw honey. Eighteen purchasers reported purchasing organic raw honey in 2020, 17 of which reported purchasing organic raw honey from Brazil, ranging from 13 percent to 100 percent of their total purchases of product from Brazil. Purchasers cited labeling requirements and customer preferences as reasons for using organic honey in end-use products.

Four purchasers reported purchasing organic raw honey from India, ranging from 4 percent to 38 percent of their total purchases from India. Purchaser *** reported that India is the largest supplier of conventional non-GMO project verified honey and a secondary supplier of organic honey, relative to Brazil. It added that "these honeys are used by food manufacturers that produce end products that are organic and non-GMO project verified." One purchaser *** reported that organic raw honey from Argentina accounted for *** percent of its total purchases from Argentina in 2020, and that Argentina produces some organic clover honey that its customers prefer.

[36] Hearing transcript, p. 111 (Luberda).

Petitioner argues that honey is "an intrinsically non-GMO single-ingredient product, and that because all honey is non-GMO honey, a requirement to purchase only non-GMO products cannot be an important factor in honey purchasing decisions."[37]

Respondents stated that organic honey from Brazil is very robust and not best suited for the retail segment, which respondents argue is where raw honey can be sold at higher prices.[38]

Blending and processing

Almost all honey is blended, and even a pure U.S.-produced raw honey is likely a blend of multiple U.S. beekeepers' honey.[39] Purchasers may buy honey from importers or packers that is a blend from multiple colors, floral sources, and country sources and may include both organic and non-organic honeys. Ingredient end user General Mills stated that blending helps with crystallization issues and to provide consistency to smooth any year-to-year variation.[40]

Petitioner stated that private label honey represents about half of processed honey sold at the retail level, is largely sold as a generic product, and most are blends from multiple countries.[41] However respondent Barkman Honey stated that some of its customers with private label brands will only sell U.S.-produced honey.[42] Petitioner argued that private label accounts are driven by price and will blend U.S. raw honey with imported raw honey to reduce price.[43]

Raw honey, as defined by the scope, has not been filtered to a level that results in the removal of most or all of the pollen, e.g., a level that removes pollen to below 25 microns. Petitioner noted that honey that is sold in retail as "raw and unfiltered" honey is still processed, but rather than reducing to 25 microns like filtered raw honey, it only filters down to 150 microns and leaves in pollen.[44] Petitioner stated that demand for the "raw and unfiltered" honey is the fastest growing sector within retail.[45]

[37] Petitioner prehearing brief, pp. 43-44.
[38] Hearing transcript, p. 300 (Wenger).
[39] Hearing transcript, p. 169 (Blumenthal).
[40] Hearing transcript, pp. 224, 226, 290 (Bash).
[41] Hearing transcript, p. 22 (Blumenthal).
[42] Hearing transcript, p. 182 (Wenger).
[43] Hearing transcript, p. 23 (Blumenthal).
[44] Hearing transcript, p. 70 (Blumenthal).
[45] Hearing transcript, p. 144 (Blumenthal).

Country-of-origin labeling

According to Petitioner, U.S.-produced raw honey does not need to be labeled. However, if the honey is imported from another source or includes honeys from foreign sources in a blend, it requires labeling.[46] If a label indicates that it is "U.S. Grade A" but includes honeys from non-U.S. sources, these countries-of-origin are required to be presented adjacent to the U.S. labeling and in a similar font.[47]

Business cycles

Most U.S. producers (34 of 45) reported that raw honey is not subject to business cycles while most importers (19 of 23) and purchasers (17 of 20) reported that it is subject to business cycles. Firms reporting that raw honey is subject to business cycles reported that raw honey production is seasonal, with production occurring in summer and is dependent on the weather and the health of the hives and environment, and that the business cycle follows the crop cycles of the floral sources. One U.S. producer reported that "beekeeping relies on the harmony of good hives, good weather, good environment, and good logistics." Importer and purchaser *** reported that while honey does not spoil as other {agricultural products} might, the seasonal nature of production drives peak purchasing activity within the first 6-9 months following crop production, followed by a period of reduced activity as most supply has been exhausted. Importers reported that tropical countries have a longer production season and that countries in the southern hemisphere have production during the winter whereas U.S. production occurs in the summer with product available in late fall.

Most U.S. producers (32 of 45) and importers (16 of 23) reported that raw honey is not subject to distinct conditions of competition, and 9 of 20 purchasers also reported that it is not subject to distinct conditions of competition. Several U.S. producers cited import competition as a distinct condition. Conditions reported by importers include the long shelf life/storability of honey, such that producers can hold onto inventory for long periods of time in anticipation of price changes; varying harvest amounts and weather cycles which impact the available supply from each country; lower consumer demand in summer than in winter; and lack of "sophisticated price discovery tools like futures markets." Purchaser *** reported that certification status is critical in the market, including certified organic or non-GMO project verified. Purchaser *** reported that SHA exerts pricing control on a large portion of U.S.-produced honey, which influences U.S. honey prices.

[46] Hearing transcript, p. 86 (Luberda).
[47] Hearing transcript, p. 87 (Blumenthal).

Most U.S. producers (20 of 35) reported that there had not been a change to business cycles or conditions of competition since 2018; most importers (13 of 22) and purchasers (13 of 20) reported that there had. U.S. producers reporting that there had been a change since 2018 cited increased import competition, and U.S. producer *** reported that although it was hurt by higher shipping costs, these increased costs also affected imports and helped domestic prices to rise. Importers cited increased demand, increased logistics costs, and weather changes. Purchasers reported increased shipping costs, unpredictable production, transportation, and supply challenges. Purchaser *** reported that "abundant" foreign supply of honey helps to fill a supply gap in the United States for light amber and amber honey, which is not produced domestically in commercially viable quantities. Purchaser *** reported that there is increased consumer demand for locally produced products. Purchasers *** submitted statements describing the impact and anticipated effects of the current crisis in Ukraine, stating that "the elimination of Ukraine as a global honey supplier has left a vacuum in the market both in the United States and Europe that domestic suppliers simply cannot fill because they do not produce amber honey used as an ingredient, and further, because they have made strategic choices to use their bee populations for pollination services rather than honey production."[48]

Demand trends

Most responding firms reported an increase in both U.S. demand and foreign demand for raw honey since January 1, 2018 (table II-8). Beyond general population growth, U.S. producers cited two main reasons for increases in both U.S. and foreign demand for honey: perceived health benefits and the desire to "eat local." Importers and purchasers cited similar reasons for increases in U.S. and foreign demand for honey, including population growth, perceived health/nutrition benefits of honey, and the impact of the COVID-19 pandemic. Importers and purchasers were asked about overall demand trends, and about demand trends in retail, ingredient, and food service markets. In all markets, most importers and purchasers reported that demand trends increased similarly to overall demand.

[48] Purchaser *** Questionnaire Addendum, March 18, 2022 and purchaser *** Questionnaire Addendum, March 25, 2022.

Table II-8
Raw honey: Count of firms' responses regarding overall domestic and foreign demand, by firm type and by market

Count in number of firms reporting

Market	Firm type	Increase	No change	Decrease	Fluctuate
Domestic demand: Overall	U.S. producers	27	1	2	5
Domestic demand: Overall	Importers	21	1	0	1
Domestic demand: Retail	Importers	18	2	0	0
Domestic demand: Ingredient	Importers	17	1	0	1
Domestic demand: Food service	Importers	11	1	6	1
Domestic demand: Overall	Purchasers	13	0	0	2
Domestic demand: Retail	Purchasers	12	0	0	0
Domestic demand: Ingredient	Purchasers	13	0	1	1
Domestic demand: Food service	Purchasers	5	0	1	6
Foreign demand: Overall	U.S. producers	4	2	0	2
Foreign demand: Overall	Importers	8	0	0	0
Foreign demand: Retail	Importers	5	0	0	0
Foreign demand: Ingredient	Importers	4	0	0	1
Foreign demand: Food service	Importers	1	1	2	1
Foreign demand: Overall	Purchasers	1	0	0	0
Foreign demand: Retail	Purchasers	0	0	0	0
Foreign demand: Ingredient	Purchasers	1	0	0	0
Foreign demand: Food service	Purchasers	0	0	0	0
Demand for end use products	Purchasers	14	0	0	6

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

Substitute products

Substitutes for raw honey are somewhat limited and can depend on the end use. Firms were asked if other products can be substituted for raw honey in the production of packaged honey and if other products can be substituted for raw honey by the consumer for raw honey or packaged honey. Virtually all U.S. producers (46 of 47), importers (22 of 22), and purchasers (17 of 18) reported that other products cannot be substituted for raw honey in the production of packaged honey. Most U.S. producers (42 of 47) but a minority of importers (8 of 22) and purchasers (7 of 19) reported that other products cannot be substituted by the consumer for raw honey or packaged honey. Among firms that identified substitutes for raw honey or packaged honey by the consumer, products listed included sugar, sweetening syrups (including maple, corn, and agave), and artificial sweeteners. No U.S. producers, slightly more than half of responding importers, and about half of responding purchasers reported that changes in the price of substitutes had affected the price for raw honey, generally indicating that alternative sweeteners were lower priced than raw honey. Firms noted that substitution can take place

among consumers, restaurants, and industrial users, and that when honey prices rise, these users may switch to less expensive sweeteners.

Purchaser *** stated that when used as an ingredient, "alternate sweeteners usually replace honey in this way: Honey will be the first sweetener by volume, and other sweeteners will be added as a second, third and fourth sweetener. The retail customer purchasing the product…will read the ingredient portion of the label and interpret it as honey being the major sweetener when, in fact, the alternate sweeteners… constitute the vast majority of the sweeteners used in the product. Obviously, the higher the price of honey gets compared to its sweetener substitutes, the more likely this scenario happens."

Substitutability issues

The degree of substitution between domestic and imported raw honey depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is a moderate degree of substitutability between domestically produced raw honey and raw honey imported from subject sources.[49] [50] Factors contributing to this level of substitutability include similar quality and lead times for raw honey from inventory. Factors reducing substitutability include strong country preferences by purchasers, depending on availability of certain floral sources, honey colors, and certifications in different countries. Specifically, darker honey color and flavor profiles of raw honey imported from subject sources, as well as organic and non-GMO certifications, may be less substitutable with U.S.-produced raw honey and raw honey from subject sources.

Purchaser decisions based on source

As shown in table II-9, most purchasers always or usually make purchasing decisions based on the producer or country of origin. Purchasers reported that most of their customers

[49] The degree of substitution between domestic and imported raw honey depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced raw honey to the raw honey imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), 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.).

[50] Petitioner argued that there is a moderate-to-high degree of substitutability between domestically produced raw honey and raw honey imported from subject sources. Petitioner prehearing brief, pp. 34-35.

never make purchasing decisions based on producer but a plurality of responding purchasers reported that their customers sometimes make purchasing decisions based on the country of origin. Most purchasers (including all four end users) reported that they or their customers always make decisions based on the manufacturer cited testing requirements, certifications such as True Source, [51] and approved lists of suppliers for quality. Responding end user purchasers *** source from countries that supply light amber or amber honeys. Other purchasers reported sourcing from countries that had True Source certifications, sourcing darker color honey for ingredient applications and certain customer specifications. Purchaser *** reported that if its customers require organic honey, it must source from Brazil or nonsubject source Mexico; if customers are using honey in industrial applications, it sources from Asia; and if customers are purchasing table honey, it will source from Argentina or Europe.

Table II-9
Raw honey: Purchasing decisions 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	10	3	4	4
Customer	Producer	3	2	4	10
Purchaser	Country	11	8	2	0
Customer	Country	5	4	7	1

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

Responding purchasers reported having a country preference for their honey purchases due to color and flavor variations, specific specifications and certifications, and organic availability. Purchaser *** reported that its customers have specified Brazil and nonsubject source Uruguay for organic uses, U.S.-produced honey for white and extra light purposes, and India and Vietnam for darker, bolder flavors for ingredient use. Purchaser *** similarly reported that clover-based honey in the United States and Argentina provides a light and sweet taste profile while India supplies extra light amber honey with mild

[51] True Source Certified voluntary system of traceability for those participants who wish to demonstrate through an independent 3rd party that their sourcing practices are in full compliance with requirements of the True Source Certified Standard. This system permits honey to be tracked from the consumer back through the supply chain to the country of origin and the Beekeeper that harvested the honey from the beehive. True Source Honey, True Source Certified Standards V6.1, January 1, 2021. https://truesourcehoney.com/true-source-certified/standards-2021-01-01.pdf, accessed May 27, 2021.

Purchaser *** reported that many U.S. producers are not True Source Honey members, which limits its ability to source domestically.

flavors, and Brazil and Vietnam are known for bolder honey flavors associated with darker honeys. Purchaser *** reported that as a ***, its customer preferences are codified in their product specifications. These product specifications establish exact sources/origins of raw honey and the proportions at which they are permitted to be used in the packaged finished goods.[52] Lastly, purchaser *** reported that it has *** that require light amber honey because "it is only color of honey available in adequate commercially available quantities." It reported that it decreased its purchases of honey from the United States in favor of countries with tropical climates where the conditions allow for a greater abundance of light amber honey production. The firm also noted that it does not purchase from China or other countries associated with adulterated honey supply.

Twenty of 21 responding purchasers reported that certain grades, types, sizes, and/or colors of raw honey are only available from certain country sources. Purchasers reported that organic raw honey is only available from Brazil and small quantities from India, and stronger flavors and darker colors are available from India and Vietnam. Purchaser *** reported that floral source is the most important factor when evaluating honey, and floral sources vary by country source.

Importance of purchasing domestic product

Fifteen of 21 purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Two purchasers reported that domestic product was required by law (for 20 and 100 percent of their purchases), 11 reported it was required by their customers (generally for 30 percent of their purchases or less), and 4 reported other preferences for domestic product. Reasons cited for preferring domestic product included: food labeling requirements or brand claims.

Most important purchase factors

As shown in table II-10, the most often cited top three factors firms consider in their purchasing decisions for raw honey were price/cost (14 firms); customer specifications or required certifications, such as flavor, color, organic, or True Source certified (12 firms);

[52] According to ***.

availability/seasonality and quality (11 firms each);[53] and origin requirements (4 firms). Quality was the most frequently cited first-most important factor (cited by 7 firms), customer specifications or required certifications was the most frequently reported second-most important factor (7 firms); and price/cost was the most frequently reported third-most important factor (10 firms). Respondent NHPDA provided email exchanges showing that raw honey purchasers, ***, consider country of origin, floral sources, and regions within a particular country, when considering sourcing decisions.[54]

Table II-10
Raw honey: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Count in number of firms reporting

Factor	First	Second	Third	Total
Price / Cost	2	2	10	14
Specifications/certifications	5	7	0	12
Quality	7	3	1	11
Availability / Seasonality	2	6	3	11
Origin requirements	2	0	2	4
All other factors	2	3	5	NA

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

Note: Other factors include unadulterated (2 firms), service (2 firms), extension of credit, on-time deliveries, suppliers' market expertise, and glyphosate levels.

Most purchasers (12 of 21) reported that they only sometimes purchase the lowest-priced product. Two purchasers reported always, four reported usually, and three reported never purchasing the lowest priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 21 factors in their purchasing decisions (table II-11). The factors rated as very important by more than half of responding purchasers were availability (21 firms), reliability of supply (20 firms), quality meets industry standards (19 firms), honey color and honey favor (18 firms each), product consistency (17 firms), price (15 firms), organic (14 firms), delivery time (13 firms), payment terms (12 firms), delivery terms and quality exceeds industry standards (11 firms).

[53] Purchasers listed quality characteristics including moisture, granulation, taste, lack of pesticides and lead, pollen, free of adulterants and pesticides, fructose glucose rations, enzyme levels, 5-hydroxymethylfurfural (HMF) levels, and other technical measurements.

[54] Respondent NHPDA posthearing brief, p. 10.

Table II-11
Raw honey: Count of importance of purchase factors, as reported by U.S. purchasers, by factor

Count in number of firms reporting

Factor	Very important	Somewhat important	Not important
Availability	21	0	0
Crystallization	4	9	7
Delivery terms	11	10	0
Delivery time	13	8	0
Discounts offered	4	4	12
Honey color	18	3	0
Honey flavor	18	3	0
Locally sourced	2	7	12
Minimum quantity requirements	6	6	7
Monofloral source	3	10	7
Organic	14	3	3
Packaging	6	13	2
Payment terms	12	7	2
Price	15	6	0
Product consistency	17	4	0
Product range	4	7	9
Quality meets industry standards	19	2	0
Quality exceeds industry standards	11	6	3
Reliability of supply	20	2	0
Technical support/service	4	12	5
U.S. transportation costs	4	12	5

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

Local honey

As seen in previous table II-11, most responding purchasers reported that locally sourced honey was not an important purchasing factor. However, respondents emphasized that U.S. producers are able to supply a particular retail segment for local honey. Respondents stated that local honey markets are strongest in population-dense regions, and that prices vary by state or region.[55]

Lead times

Raw honey is primarily sold from inventory.[56] U.S. producers reported that most of their shipments (89.0 percent) were from U.S. inventories with reported lead times generally ranging from of 7 to 45 days, and the remaining 11.0 percent were produced-to-order, with lead times

[55] Hearing transcript, pp. 12, 183-84 (Kendler, Wenger).

[56] Some firms stated that honey has a long shelf-life. See *Raw Honey from Argentina, Brazil, India, Ukraine, and Vietnam*, Staff Report, Inv. Nos. 731-TA-1560-1564 (Preliminary), p. II-9.

of 3 to 180 days. Importers reported that 48.0 percent of their shipments were from U.S. inventories, 28.7 percent were produced-to-order, and 23.4 percent were from foreign inventories. Importers generally reported average lead times of 1 to 90 days from U.S. inventories, 45 to 120 days from foreign inventories, and 14 to 90 days for produced-to-order product.

Supplier certification

Fourteen of 20 responding purchasers require their suppliers to become certified or qualified to sell raw honey to their firm. Purchasers indicated registering for True Source, requiring organic certifications, GFSI and third-party audits, non-GMO Project Verified certifications, and site visits. Most purchasers reported that the time to qualify a new supplier was one month or less.[57] Purchasers also described their qualification processes, which include surveys, onsite audits, compliance with policies and procedures, R&D lab analysis, benchtop testing, food safety documentation, and traceability reporting. Qualification processes generally were reported to take 10 to 180 days to complete.

Seven of 20 responding purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify raw honey or had lost its approved status since 2018. Purchasers listed lack of True Source Certification, failure to meet quality standards, presence of bee feeding syrups, condition of the drums used to package the honey, lack of current third-party audits or food safety certifications, failures of analytical testing or adequate food safety documentation, or failed adulteration and authenticity tests.

Minimum quality specifications

As can be seen from table II-12, purchaser responses concerning U.S. producers' ability to meet minimum quality specifications were mixed, with the plurality of responding purchasers reporting that U.S. producers usually meet minimum quality specifications. The majority of responding purchasers reported that raw honey from Brazil always meets minimum quality specifications and that raw honey from Argentina and India usually meets minimum quality specifications. Purchasers' responses were equally divided regarding raw honey from Vietnam always or usually meeting minimum quality. Purchaser *** reported that a considerable percentage of U.S. honey fails to meet quality specifications because it is adulterated with cheaper sweeteners, failed the specification for microbiological reasons, or

[57] Seven of 13 responding purchasers reported that the time to qualify a supplier was less than one month; 3 purchasers reported that the time to qualify ranged from 120 to 180 days; and 2 purchasers reported that the time varies and did not provide an estimate.

exceeded the acceptable levels of extraneous matter. Purchaser *** reported that U.S.-produced raw honey was occasionally rejected due to sugar adulteration, Argentine raw honey was occasionally rejected because the color was out of specification, Brazilian and Indian raw honey was occasionally rejected because of issues with the flavor profile, and Vietnamese raw honey occasionally exceeds moisture levels. Purchaser *** reported that pesticides or antibiotic residues are often found in raw honey from the United States.

Purchasers listed quality characteristics including moisture, granulation, taste, lack of pesticides and lead, pollen, free of adulterants and pesticides, fructose glucose ratios, enzyme levels, HMF, and other technical measurements.

Table II-12
Raw honey: Count of firms' 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
United States	4	8	4	3
Argentina	5	7	1	0
Brazil	12	8	0	0
India	7	10	0	1
Vietnam	9	9	0	0
Nonsubject Ukraine	8	4	1	0
All other sources	2	3	1	0

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

Ingredient end users stated that their specifications cite color, flavor profile, and blending.[58]

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2018 (table II-13). A plurality of purchasers reported increased purchases from the United States, Brazil, India, and Vietnam, although responses were mixed for all sources. Purchasers reported mixed responses for Argentina, with four purchasers each reporting decreasing, increasing, and fluctuating purchases since 2018. Many purchasers cited increased demand generally, fluctuating availability from different sources, and some purchasers reported increased purchases from Brazil (and on a smaller scale, India) as demand for organic products increases. Purchaser *** reported that availability of supply is the primary driver of its purchasing patterns and that U.S. producers have not been able to supply sufficient

[58] Hearing transcript, pp. 225-26 (Bash, Bertrand, Haines).

quantities to support its *** so its domestic honey purchases have declined.

Table II-13
Raw honey: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

Source of purchases	Decreased	Increased	Constant	Fluctuated	Did not purchase
United States	4	10	1	4	3
Argentina	4	4	1	4	5
Brazil	2	9	5	4	0
India	5	7	3	2	2
Vietnam	1	8	5	3	2
Nonsubject Ukraine	3	4	3	3	5
All other sources	7	1	2	7	1
Sources unknown	0	0	0	0	10

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

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

Ten of 21 responding purchasers reported that they had changed suppliers since January 1, 2018. Specifically, firms cited changing end use needs, customer specifications, available certifications, and availability as reasons for changing suppliers.

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

Purchasers were asked a number of questions comparing raw honey produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 21 factors (table II-14) for which they were asked to rate the importance. Purchaser responses were mixed on the comparability of raw honey from the United States, subject, and nonsubject sources. The plurality of responding purchasers reported that when compared to raw honey from Argentina, Brazil,[59] nonsubject Ukraine, and other nonsubject sources, U.S.-produced honey was comparable or inferior on all factors that were rated as "very important" to purchasers (shown in table II-11). U.S.-produced raw honey was considered by a plurality of purchasers to be comparable or inferior to raw honey from India on all factors, with the exception of honey flavor, for which U.S.-produced honey was

[59] One exception is the comparison of honey flavor of U.S. raw honey to Brazilian raw honey, for which eight purchasers reported honey flavor of raw honey from the United States is superior and eight purchasers reported that raw honey from the United States is comparable to raw honey from Brazil.

superior, and U.S.-produced raw honey was considered comparable or inferior to raw honey from Vietnam for all factors, except honey flavor and honey color. In comparisons with raw honey from all subject sources, U.S.-produced honey was considered inferior in terms of availability, organic, price, product consistency, and reliability of supply.

Table II-14
Raw honey: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and by country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Argentina	0	4	8
Crystallization	U.S. vs Argentina	0	10	1
Delivery terms	U.S. vs Argentina	0	7	4
Delivery time	U.S. vs Argentina	2	4	5
Discounts offered	U.S. vs Argentina	0	6	2
Honey color	U.S. vs Argentina	0	11	1
Honey flavor	U.S. vs Argentina	2	9	1
Minimum quantity requirements	U.S. vs Argentina	1	5	5
Monofloral source	U.S. vs Argentina	3	7	0
Organic	U.S. vs Argentina	0	4	5
Packaging	U.S. vs Argentina	0	5	6
Payment terms	U.S. vs Argentina	2	7	2
Price	U.S. vs Argentina	1	1	10
Product consistency	U.S. vs Argentina	0	5	6
Product range	U.S. vs Argentina	2	7	3
Quality meets industry standards	U.S. vs Argentina	1	6	4
Quality exceeds industry standards	U.S. vs Argentina	1	5	5
Reliability of supply	U.S. vs Argentina	0	4	7
Technical support/service	U.S. vs Argentina	0	2	6
U.S. transportation costs	U.S. vs Argentina	0	7	3

Table continued.

Table II-14 Continued
Raw honey: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and by country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Brazil	2	3	15
Crystallization	U.S. vs Brazil	0	15	2
Delivery terms	U.S. vs Brazil	0	12	5
Delivery time	U.S. vs Brazil	3	7	7
Discounts offered	U.S. vs Brazil	0	10	3
Honey color	U.S. vs Brazil	7	10	3
Honey flavor	U.S. vs Brazil	8	8	3
Minimum quantity requirements	U.S. vs Brazil	3	9	5
Monofloral source	U.S. vs Brazil	4	11	0
Organic	U.S. vs Brazil	1	1	16
Packaging	U.S. vs Brazil	0	7	10
Payment terms	U.S. vs Brazil	5	9	3
Price	U.S. vs Brazil	2	2	14
Product consistency	U.S. vs Brazil	2	7	8
Product range	U.S. vs Brazil	3	9	4
Quality meets industry standards	U.S. vs Brazil	2	9	6
Quality exceeds industry standards	U.S. vs Brazil	2	7	8
Reliability of supply	U.S. vs Brazil	1	5	11
Technical support/service	U.S. vs Brazil	0	6	8
U.S. transportation costs	U.S. vs Brazil	0	12	4

Table continued.

Table II-14 Continued
Raw honey: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and by country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs India	1	4	12
Crystallization	U.S. vs India	3	12	0
Delivery terms	U.S. vs India	0	11	4
Delivery time	U.S. vs India	4	5	6
Discounts offered	U.S. vs India	0	9	3
Honey color	U.S. vs India	4	11	3
Honey flavor	U.S. vs India	7	6	4
Minimum quantity requirements	U.S. vs India	2	8	5
Monofloral source	U.S. vs India	6	7	1
Organic	U.S. vs India	0	6	9
Packaging	U.S. vs India	0	7	8
Payment terms	U.S. vs India	2	10	3
Price	U.S. vs India	1	2	13
Product consistency	U.S. vs India	1	6	8
Product range	U.S. vs India	3	9	3
Quality meets industry standards	U.S. vs India	2	8	5
Quality exceeds industry standards	U.S. vs India	2	7	6
Reliability of supply	U.S. vs India	0	5	10
Technical support/service	U.S. vs India	0	5	7
U.S. transportation costs	U.S. vs India	0	11	3

Table continued.

Table II-14 Continued
Raw honey: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and by country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Vietnam	2	2	14
Crystallization	U.S. vs Vietnam	1	12	2
Delivery terms	U.S. vs Vietnam	0	10	5
Delivery time	U.S. vs Vietnam	4	6	5
Discounts offered	U.S. vs Vietnam	0	9	3
Honey color	U.S. vs Vietnam	8	5	5
Honey flavor	U.S. vs Vietnam	8	6	4
Minimum quantity requirements	U.S. vs Vietnam	3	7	5
Monofloral source	U.S. vs Vietnam	8	5	1
Organic	U.S. vs Vietnam	0	8	2
Packaging	U.S. vs Vietnam	0	6	9
Payment terms	U.S. vs Vietnam	3	8	3
Price	U.S. vs Vietnam	1	2	13
Product consistency	U.S. vs Vietnam	2	5	8
Product range	U.S. vs Vietnam	9	5	0
Quality meets industry standards	U.S. vs Vietnam	0	11	4
Quality exceeds industry standards	U.S. vs Vietnam	3	7	5
Reliability of supply	U.S. vs Vietnam	0	5	10
Technical support/service	U.S. vs Vietnam	0	5	7
U.S. transportation costs	U.S. vs Vietnam	1	9	3

Table continued.

Table II-14 Continued
Raw honey: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and by country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Nonsubject Ukraine	2	4	6
Crystallization	U.S. vs Nonsubject Ukraine	5	6	0
Delivery terms	U.S. vs Nonsubject Ukraine	0	7	4
Delivery time	U.S. vs Nonsubject Ukraine	3	6	2
Discounts offered	U.S. vs Nonsubject Ukraine	0	6	2
Honey color	U.S. vs Nonsubject Ukraine	3	8	2
Honey flavor	U.S. vs Nonsubject Ukraine	3	7	2
Minimum quantity requirements	U.S. vs Nonsubject Ukraine	0	6	5
Monofloral source	U.S. vs Nonsubject Ukraine	5	3	1
Organic	U.S. vs Nonsubject Ukraine	0	5	1
Packaging	U.S. vs Nonsubject Ukraine	0	3	8
Payment terms	U.S. vs Nonsubject Ukraine	3	6	2
Price	U.S. vs Nonsubject Ukraine	0	2	10
Product consistency	U.S. vs Nonsubject Ukraine	1	2	8
Product range	U.S. vs Nonsubject Ukraine	7	3	1
Quality meets industry standards	U.S. vs Nonsubject Ukraine	0	7	4
Quality exceeds industry standards	U.S. vs Nonsubject Ukraine	2	5	4
Reliability of supply	U.S. vs Nonsubject Ukraine	0	4	7
Technical support/service	U.S. vs Nonsubject Ukraine	0	0	8
U.S. transportation costs	U.S. vs Nonsubject Ukraine	0	7	3

Table continued.

Table II-14 Continued
Raw honey: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and by country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Other Nonsubject	1	5	5
Crystallization	U.S. vs Other Nonsubject	1	8	1
Delivery terms	U.S. vs Other Nonsubject	0	7	3
Delivery time	U.S. vs Other Nonsubject	3	5	2
Discounts offered	U.S. vs Other Nonsubject	0	6	2
Honey color	U.S. vs Other Nonsubject	3	7	1
Honey flavor	U.S. vs Other Nonsubject	5	6	2
Minimum quantity requirements	U.S. vs Other Nonsubject	0	6	4
Monofloral source	U.S. vs Other Nonsubject	4	5	0
Organic	U.S. vs Other Nonsubject	0	4	4
Packaging	U.S. vs Other Nonsubject	0	4	6
Payment terms	U.S. vs Other Nonsubject	2	7	1
Price	U.S. vs Other Nonsubject	0	3	8
Product consistency	U.S. vs Other Nonsubject	1	3	5
Product range	U.S. vs Other Nonsubject	3	6	1
Quality meets industry standards	U.S. vs Other Nonsubject	0	7	3
Quality exceeds industry standards	U.S. vs Other Nonsubject	1	6	3
Reliability of supply	U.S. vs Other Nonsubject	0	4	5
Technical support/service	U.S. vs Other Nonsubject	0	2	5
U.S. transportation costs	U.S. vs Other Nonsubject	0	7	2

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

End user purchasers clarified that U.S.-produced raw honey is generally better tasting and better suited for retail, but inferior to raw honey from certain subject sources in the robustness of flavor and other attributes that make raw honey from other sources preferable for use as an ingredient. Purchaser *** stated that it considers U.S.-produced honey inferior in terms of color and flavor because the U.S. primarily produces white and extra-light amber honey which are inferior honey for ***. These differences also make white and extra-light amber honey much more palatable when directly consumed, therefore the vast majority of white and extra-light amber honey is packaged for retail which has higher profit opportunities. It continued that there is virtually no availability of light amber honey in the United States, let alone light amber honey that has the unique color and flavor profile of Vietnamese honey.

Purchaser *** also stated that the amber honey from India and Vietnam is unique in flavor and color profile and ideal for industrial ingredient use and added that honey produced in the United States is typically diverted to retail due to its sweeter flavor and light color. For

those reasons, it may be considered higher quality in the market as a whole, but it is not ideal for ingredient use.

Comparison of U.S.-produced and imported raw honey

In order to determine whether U.S.-produced raw honey can generally be used in the same applications as imports from subject countries, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-15, the vast majority of U.S. producers reported that raw honey from all sources was always interchangeable. Importers' and purchasers' responses varied depending on source (see tables II-16 and II-17). Most importers reported that raw honey from Argentina can frequently be used interchangeably with U.S.-produced honey, and a plurality of purchasers reported that Argentinian honey is sometimes interchangeable with U.S.-produced honey. Most importers and purchasers reported that raw honey from Brazil and Vietnam can never be used interchangeably with U.S.-produced honey, and a plurality of responding importers and purchasers reported that raw honey from India can sometimes be used interchangeably with raw honey produced in the United States.

Factors reported by importers and purchasers that limited interchangeability between domestic and subject imported raw honey include organic and other classifications, available color and flavor profiles, end use requirements, and "eat local" campaigns. U.S. importer *** stated that interchangeability is based on factors like market channel, customer specification, organoleptic properties,[60] fructose glucose ratios, and conventional versus organic, citing an example of the retail market needing a two-year shelf life which requires higher fructose glucose ratios in honey that is available only in Argentina and Brazil. Importers generally reported that raw honey from all five subject countries is generally interchangeable for food service and industrial uses, but distinct flavor and color profiles for honey from India and Vietnam make them less suitable for retail use. It added that U.S. consumers prefer lighter and milder honey in retail stores, while honey from India and Vietnam tends to be darker with bolder flavors. Purchaser *** reported that Vietnamese honey has a unique color and flavor characteristics due to "rubber acacia trees, and other ecological influences such as heat and moisture that create a signature experience for its consumers at limits interchangeability with other countries, however it also reported that it receives ***. Purchaser *** reported that Vietnam is the only source that

[60] Organoleptic properties are the aspects of food, water or other substances that create an individual experience via the senses—including taste, sight, smell, and touch.

is able to supply an adequate quantity of darker honey that is antibiotic- and pesticide residue-free, and although it sources small amounts of Brazilian and Indian honey ***, these sources do not have adequate amounts of light amber honey to supply the U.S. market.

Table II-15
Raw honey: Interchangeability between raw honey produced in the United States and in other countries reported by U.S. producers, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Argentina	36	6	2	1
United States vs. Brazil	36	6	0	3
United States vs. India	36	5	3	1
United States vs. Vietnam	36	5	3	1
United States vs. Nonsubject Ukraine	36	5	3	1
Argentina vs. Brazil	37	3	1	2
Argentina vs. India	37	3	2	0
Argentina vs. Vietnam	37	3	2	0
Argentina vs. Nonsubject Ukraine	37	3	2	0
Brazil vs. India	37	3	0	2
Brazil vs. Vietnam	37	3	0	2
Brazil vs. Nonsubject Ukraine	37	3	0	2
India vs. Vietnam	37	3	2	0
India vs. Nonsubject Ukraine	37	3	2	0
Nonsubject Ukraine vs. Vietnam	37	3	2	0
United States vs. Other	35	5	2	1
Argentina vs. Other	36	3	2	0
Brazil vs. Other	36	3	0	2
India vs. Other	35	3	2	0
Vietnam vs. Other	34	3	2	0
Nonsubject Ukraine vs. Other	35	3	2	0

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

Table II-16
Raw honey: Interchangeability between raw honey produced in the United States and in other countries reported by U.S. importers, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Argentina	2	9	3	2
United States vs. Brazil	0	0	5	13
United States vs. India	0	0	9	7
United States vs. Vietnam	0	0	5	11
United States vs. Nonsubject Ukraine	3	3	7	3
Argentina vs. Brazil	1	1	6	8
Argentina vs. India	0	2	6	7
Argentina vs. Vietnam	0	2	2	12
Argentina vs. Nonsubject Ukraine	2	3	6	3
Brazil vs. India	0	1	9	8
Brazil vs. Vietnam	0	0	2	17
Brazil vs. Nonsubject Ukraine	0	0	2	14
India vs. Vietnam	0	7	10	1
India vs. Nonsubject Ukraine	0	7	8	0
Nonsubject Ukraine vs. Vietnam	0	2	5	10
United States vs. Other	0	0	9	2
Argentina vs. Other	0	1	8	2
Brazil vs. Other	0	1	6	4
India vs. Other	0	1	8	1
Vietnam vs. Other	0	1	7	3
Nonsubject Ukraine vs. Other	0	1	8	1

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

Table II-17
Raw honey: Interchangeability between raw honey produced in the United States and in other countries reported by U.S. purchasers, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Argentina	2	3	5	2
United States vs. Brazil	1	0	4	13
United States vs. India	1	0	8	7
United States vs. Vietnam	1	0	6	9
United States vs. Nonsubject Ukraine	3	1	5	5
Argentina vs. Brazil	1	2	5	5
Argentina vs. India	1	1	6	5
Argentina vs. Vietnam	1	1	5	6
Argentina vs. Nonsubject Ukraine	2	1	8	2
Brazil vs. India	1	1	10	5
Brazil vs. Vietnam	1	0	5	11
Brazil vs. Nonsubject Ukraine	1	1	5	9
India vs. Vietnam	3	4	8	2
India vs. Nonsubject Ukraine	1	3	9	2
Nonsubject Ukraine vs. Vietnam	1	0	6	8
United States vs. Other	1	0	7	1
Argentina vs. Other	1	0	5	1
Brazil vs. Other	1	0	5	3
India vs. Other	1	0	7	1
Vietnam vs. Other	1	0	6	2
Nonsubject Ukraine vs. Other	1	0	6	1

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of raw honey from the United States, subject, or non-subject countries. As seen in table II-18, most U.S. producers reported that such differences between sources were never significant in their sales whereas importers most frequently reported that differences other than price were always significant between raw honey produced in subject countries, and most purchasers reported that differences other than price were always significant (see tables II-19 and II-20).[61] Differences other than price include product quality and certification, organic/non-GMO specifications, volume and duration of contracts, customer requirements, and flavor profiles. U.S. importer *** noted that imported honey faces more rigorous testing for quality and adulteration parameters than domestic honey, which is not necessarily tested by U.S. beekeepers. Importer ***'s response also discussed the importance of quality assurance, including True Source

[61] Two exceptions were for comparisons between India/nonsubject Ukraine and India/Vietnam, for which most purchasers reported that factors other than price are only sometimes significant.

Certified sourcing standards. Importer *** stated that honey from Brazil may be organic, and honey from Brazil, India, or Vietnam may be non-GMO certified. Similarly, differences other than price reported by purchasers include color and flavor differences, organic/non-GMO specifications, product consistency, and availability of supply.

Table II-18

Raw honey: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. producers, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Argentina	5	0	2	38
United States vs. Brazil	5	0	2	38
United States vs. India	4	0	2	38
United States vs. Vietnam	4	0	2	38
United States vs. Nonsubject Ukraine	4	0	2	38
Argentina vs. Brazil	3	0	2	38
Argentina vs. India	2	0	2	38
Argentina vs. Vietnam	2	0	2	38
Argentina vs. Nonsubject Ukraine	2	0	2	38
Brazil vs. India	2	0	2	38
Brazil vs. Vietnam	2	0	2	38
Brazil vs. Nonsubject Ukraine	2	0	2	38
India vs. Vietnam	2	0	2	38
India vs. Nonsubject Ukraine	2	0	2	38
Nonsubject Ukraine vs. Vietnam	2	0	2	38
United States vs. Other	4	0	2	38
Argentina vs. Other	2	0	2	38
Brazil vs. Other	2	0	2	38
India vs. Other	2	0	2	38
Vietnam vs. Other	2	0	2	38
Nonsubject Ukraine vs. Other	2	0	2	38

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

Table II-19

Raw honey: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. importers, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Argentina	7	3	5	0
United States vs. Brazil	12	2	2	1
United States vs. India	10	3	2	1
United States vs. Vietnam	11	4	1	1
United States vs. Nonsubject Ukraine	7	5	4	0
Argentina vs. Brazil	9	0	3	3
Argentina vs. India	7	2	4	1
Argentina vs. Vietnam	10	2	3	1
Argentina vs. Nonsubject Ukraine	7	2	5	0
Brazil vs. India	10	1	3	3
Brazil vs. Vietnam	13	2	2	2
Brazil vs. Nonsubject Ukraine	12	0	3	2
India vs. Vietnam	5	0	11	2
India vs. Nonsubject Ukraine	5	0	10	1
Nonsubject Ukraine vs. Vietnam	9	1	6	1
United States vs. Other	5	1	3	0
Argentina vs. Other	4	0	5	0
Brazil vs. Other	6	0	2	1
India vs. Other	4	0	5	0
Vietnam vs. Other	5	0	4	0
Nonsubject Ukraine vs. Other	3	0	5	0

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

Table II-20

Raw honey: Perceived importance of factors other than price between product produced in the United States and in other countries reported by U.S. purchasers, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Argentina	6	1	2	2
United States vs. Brazil	14	1	1	1
United States vs. India	12	2	1	1
United States vs. Vietnam	12	3	0	1
United States vs. Nonsubject Ukraine	8	1	2	2
Argentina vs. Brazil	6	1	2	2
Argentina vs. India	6	2	2	2
Argentina vs. Vietnam	7	2	1	2
Argentina vs. Nonsubject Ukraine	4	2	2	3
Brazil vs. India	8	2	5	2
Brazil vs. Vietnam	12	2	2	1
Brazil vs. Nonsubject Ukraine	8	2	3	1
India vs. Vietnam	5	0	9	3
India vs. Nonsubject Ukraine	6	1	7	1
Nonsubject Ukraine vs. Vietnam	8	2	4	1
United States vs. Other	4	0	2	1
Argentina vs. Other	2	0	2	1
Brazil vs. Other	4	0	2	1
India vs. Other	2	0	4	1
Vietnam vs. Other	3	0	4	1
Nonsubject Ukraine vs. Other	2	0	3	1

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

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates and Petitioner did so.

U.S. supply elasticity

The domestic supply elasticity for raw honey measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of raw honey. 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 raw honey. While limited in their ability to increase production (because of limitations of bees' production and climate, among other factors) and limited alternate markets, U.S. producers have relatively large inventories. Analysis of these factors above indicates that the U.S. industry

has a low-to-moderate ability to increase or decrease shipments to the U.S. market; an estimate in the range of 1 to 3 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for raw honey measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of raw honey. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the cost share of raw honey in the production of downstream products. Based on the available information, including limited substitute products and a wide range of cost share in end uses, the aggregate demand for raw honey is likely to be moderately inelastic; a range of -0.25 to -1.0 is suggested, with raw honey for retail uses falling on the lower end of the range and raw honey for ingredient end uses falling on the higher end of the range.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[62] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.), organic certifications, color and flavor profiles, and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced raw honey and imported raw honey is likely to be in the range of 2 to 4.[63] [64]Specifically, darker honey color and flavor profiles for product from Vietnam, as well as organic and non-GMO certifications for product from Brazil and India, may limit substitutability of U.S.-produced raw honey and raw honey from subject sources. Raw honey from Argentina may be on the higher end of the range, due to more similar color and flavor profiles to U.S.-produced honey.

[62] 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.

[63] Based on additional information provided in purchaser questionnaires during the final phase, staff lowered its estimate in the preliminary phase of these investigations of moderate-to-high substitutability. Refer to “Sustainability Issues” section above.

[64] Petitioner argued that there is a moderate-to-high degree of substitutability between domestically produced raw honey and raw honey imported from subject sources. Petitioner prehearing brief, pp. 34-35.

Part III: 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 dumping margins was presented in *Part I* of this report and information on the volume and pricing of imports of the subject merchandise is presented in *Part IV* and *Part V*. Information on the other factors specified is presented in this section and/or *Part VI* and (except as noted) is based on the questionnaire responses of 84 firms that accounted for 31.2 percent of U.S. production of raw honey during 2020 as reported by USDA/NASS.

U.S. producers

Both petitioner organizations (AHPA and SHA) are recognized in the U.S. beekeeping industry as representatives of the interests of commercial honey producers.[1] AHPA classifies its U.S. beekeeper members as hobbyists (1-75 hives), sideliners (76-300 hives), or commercial beekeepers (301+ hives).[2] According to USDA, hobbyist beekeepers generally keep bees for a hobby or for small-scale pollination of orchard or field crops. Most honey produced by hobbyists is consumed at home, given away, or sold directly by the beekeeper. Part-time or sideliner beekeepers generally market their honey either through direct sales to consumers or retail outlets, or through bulk sales to honey processors.[3] Most raw honey produced by commercial beekeepers is sold to packers who process the honey and sell it to food manufacturers or retailers.

USDA collects data on honey producing operations from a stratified sample of all known operations with at least five honeybee colonies that also meet USDA's definition of a farm.[4] In 2016, operations with five or more colonies produced more than 99 percent of honey in the United States. However, the USDA estimates that 44 percent of apiary workers labored on farms with less than five colonies. This proportion includes unpaid workers and hobbyists.[5]

[1] Petition, pp. 2-3.

[2] AHPA website, https://www.ahpanet.com/, accessed May 17, 2021.

[3] Canada, Carol and Jasper Womach, CRS Report for Congress, *Farm Commodity Programs: Honey*, October 4, 2006, p. CRS-3.

[4] National Agricultural Statistics Service (NASS), Agricultural Statistics Board, United States Department of Agriculture (USDA) Honey Report, March 18, 2021, p. 5.

[5] *Honey*, NASS, USDA, Agriculture Statistics Board, March 22, 2017.

In addition to the production of raw honey, beekeepers can provide pollination services to supplement their incomes and to gain access to other sources of nectar for honey production. As such, beekeepers are often migratory, moving their hives as needed to areas in need of bees' pollination services or areas rich in certain flora to promote production of a distinct type of honey.[6] In addition, some full-time beekeepers specialize in the production of queen bees, packaged bees, nucleus colonies ("nucs"), or may focus on the production of beeswax or propolis to further augment their income.[7]

The Commission issued a U.S. producer questionnaire to 333 firms based on information contained in the petition and staff research. As noted above, 84 firms provided usable data on their operations. Staff believe that these responses represent 31.2 percent of U.S. production of raw honey during 2020 as reported by USDA/NASS.

In the Commission's U.S. producer questionnaire, firms were asked to identify if their firm produced raw honey using fewer than 3,800 colonies in the United States throughout the period of investigation (i.e., never exceeded 3,800 colonies in any given year). Firms that met these criteria (hereinafter, "smaller" firms) were allowed to submit an abbreviated version of the questionnaire providing general trade, financial, and employment data, while firms that produced raw honey using more than 3,800 colonies in the United States at any point during the period of investigation (hereinafter, "larger" firms) were required to complete a more detailed version of the questionnaire.

Table III-1 lists U.S. producers of raw honey, their production locations, positions on the petition, and shares of total production. Of the 84 responding U.S. producers, 74 are members of one of the petitioning organizations. Of the 10 firms that reported not to be a member of one of the petitioning organizations, *** the petition (*** and ***), *** the petition, and *** on the petition (***). The number of U.S. producers identifying as larger firms totaled 47 while the number of U.S. producers identifying as smaller firms totaled 37. Larger U.S. producers' share of total reported production was more than 90 percent in 2020.

[6] Pollination Facts, American Beekeeping Federation, June 14, 2016.

[7] National Agricultural Statistics Service (NASS), Agricultural Statistics Board, United States Department of Agriculture (USDA) Honey Report, March 18, 2021, pp. 1 and 4.

Table III-1
Raw honey: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2020

Share and ratio in percent

Firm	Position on petitions	Production location(s)	Firm Type	Share of reported production	Ratio to NASS overall production
2J Honey	***	Powers Lake, ND	***	***	***
Adee Honey	Petitioner	Bruce, SD Roscoe, SD	***	***	***
Arnold Apiaries	Petitioner	Deckerville, MI	***	***	***
Artesian Honey	***	Artesian, SD	***	***	***
B&B Apiaries	Petitioner	Buhl, ID	***	***	***
Barkman	***	Blountstown, FL Bainbridge, GA Weidman, MI Victor, NY	***	***	***
Bauer Honey	Petitioner	Fertile MN	***	***	***
Beekman Apiaries	Petitioner	Fresno CA Sanger CA San Luis Obispo CA Bakersfield CA	***	***	***
Beeline Honey	Petitioner	Choteau, MT	***	***	***
Belliston Bros Apiaries	Petitioner	Burley, ID	***	***	***
Brady Bees	Petitioner	Liberty, TX Cayuga, TX Kennmare, ND	***	***	***
Browning Honey	Petitioner	Idaho Falls, ID Jamestown, ND	***	***	***
Bryant Honey	Petitioner	Worland, WY	***	***	***
Buhmann Apiaries	Petitioner	Zurich, MT	***	***	***
California Apiaries	Petitioner	Hughson, CA Selz, ND	***	***	***
Captain Cook	Petitioner	Captain Cook, HI	***	***	***
Cary's Honey	Petitioner	Lindsay, CA	***	***	***
Chip's Bees	Petitioner	Fillmore, CA Lakota, ND	***	***	***
Collins Honey	Petitioner	Evadale, TX	***	***	***
Cox Honey	Petitioner	Lewiston, UT	***	***	***
Coy Bee	Petitioner	Wiggins, MS	***	***	***
Coy's Honey	Petitioner	Jonesboro, AR	***	***	***

Table continued.

Table III-1 Continued
Raw honey: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2020

Share and ratio in percent

Firm	Position on petitions	Production location(s)	Firm Type	Share of reported production	Ratio to NASS overall production
Dan's Honey	Petitioner	Perham, MN	***	***	***
Dennis Schiltgen	Petitioner	Martell, WI	***	***	***
Duff Apiaries	Petitioner	Hampton, MN	***	***	***
Eau Galle Apiaries	Petitioner	Eau Galle, WI	***	***	***
Evergreen Honey	Petitioner	Bunkie, LA Jennings, LA	***	***	***
Fairview Honey	Petitioner	Fairview MT Westmorland CA	***	***	***
Golden Prairie	Petitioner	Manhattan, KS	***	***	***
Gunter Honey	Petitioner	Towner, ND	***	***	***
Harvest Honey	Petitioner	Baldwin, ND	***	***	***
Hawaii Harvest Honey	Petitioner	Paauilo, HI	***	***	***
Hawaii Island Honey	Petitioner	Keaau,HI St. Martinville, LA	***	***	***
Hiatt Honey	Petitioner	Bowman, ND Madera, CA Ephrata, WA	***	***	***
Hidden Hive	Petitioner	Rocky Ford	***	***	***
Honl's Bees	Petitioner	Winthrop, MN	***	***	***
Horton's Hives	Petitioner	Selah, WA	***	***	***
Indian Summer	***	Germantown, WI Webster, FL	***	***	***
Integribees	Petitioner	Danbury, TX	***	***	***
J&J Bee	Petitioner	Gobles, MI	***	***	***
Jim's Honey	***	Bakersfield, CA. Onida, SD.	***	***	***
Johnson Apiaries	Petitioner	Iowa Illinois Wisconsin	***	***	***
Jon Holte	Petitioner	Harris, Minnesota	***	***	***
Jubilee HoneyBee	Petitioner	Camarillo, CA Ojai, CA Montpilier, ID Preston, ID	***	***	***

Table continued.

Table III-1 Continued
Raw honey: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2020

Share and ratio in percent

Firm	Position on petitions	Production location(s)	Firm Type	Share of reported production	Ratio to NASS overall production
Kona Queen	***	Kailua Kona, HI Captain Cook, HI Ocean View, HI Hilo, HI	***	***	***
Lambs Honey Farm	Petitioner	Mohall, ND Jasper, TX	***	***	***
Larson Apiaries	Petitioner	Billings, MT	***	***	***
LB Werks	Petitioner	Bancroft, WI Carthage, TX	***	***	***
Monda Honey	Petitioner	East Grand Forks, MN	***	***	***
Morlock Honey	Petitioner	Casselton, ND	***	***	***
Mountain Avenue	Petitioner	Fontana, CA Garrison, ND Colome, SD Stanford, MT	***	***	***
MW Maxwell Honey	Petitioner	Turtle Lake, ND Lake City, FL	***	***	***
Newswander Apiaries	Petitioner	Preston, ID	***	***	***
Northern Bloom	Petitioner	Wolf Point, MT	***	***	***
Noyes Apiaries	Petitioner	Turtle Lake, ND Fruitland, ID	***	***	***
Olivarez Honey	Petitioner	Big Timber, MT Roundup, MT Broadus, MT Alturas, CA Kona, HI	***	***	***
Olsen Honey	Petitioner	Albany, OR	***	***	***
Rick and Terri	Petitioner	Los Banos, CA	***	***	***
Rittenhouse	Petitioner	Paynesville, MN	***	***	***
River Road Honey	Petitioner	Greybull, WY Greybull, WY	***	***	***
Rufers Apiaries	Petitioner	Waverly, MN Cokato, MN Howard Lake, MN Dassel, MN Litchfield, MN Paynesville, MN	***	***	***

Table continued.

Table III-1 Continued
Raw honey: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2020

Share and ratio in percent

Firm	Position on petitions	Production location(s)	Firm Type	Share of reported production	Ratio to NASS overall production
Sadler Honey	Petitioner	Apollo Beach, FL	***	***	***
Selby Honey	Petitioner	Java, SD	***	***	***
Shoreline Honey	Petitioner	Hudsonville MI	***	***	***
Smith Revocable Trust	Petitioner	Eau Galle, WI	***	***	***
Smoot Honey	Petitioner	Power, MT	***	***	***
Steve E Park	Petitioner	Harlowton, MT Palo Cedro, CA	***	***	***
Stoddard Honey	Petitioner	Delta, UT	***	***	***
Strachan Apiaries	Petitioner	Yuba City, CA Choteau, MT	***	***	***
Stroope Honey	Petitioner	Brazoria County, TX Galveston County, TX Uvalde County, TX Floyd County, TX Cavalier County, ND	***	***	***
Sundberg Apiaries	Petitioner	Fergus Falls, MN	***	***	***
Sweet Bee Honey	Petitioner	Milton Freewater, OR	***	***	***
Sweet River	Petitioner	Beeville, Texas Glen Ullin, ND	***	***	***
Sweetland Honey	***	Mapleton, UT	***	***	***

Table continued.

Table III-1 Continued
Raw honey: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2020

Share and ratio in percent

Firm	Position on petitions	Production location(s)	Firm Type	Share of reported production	Ratio to NASS overall production
Thomas Honey	Petitioner	Liberty, TX Langdon, ND	***	***	***
Three Bears	***	Fargo, ND Harwood, ND Lake Park, MN Hitterdal, MN Hawley, MN Glyndon, MN	***	***	***
Tim Fenston	Petitioner	Madera, CA	***	***	***
Treasure Valley	***	Parma, ID Nampa, ID Nyssa, OR Vale, OR Colstrip, MT Hay Springs, NE	***	***	***
Ubees California	***	Kerman, CA	***	***	***
Ubees South Dakota	Petitioner	Redfield, SD	***	***	***
Vazza	Petitioner	Clarno, OR Hermiston, OR	***	***	***
Wee Bee Honey	Petitioner	NY FL	***	***	***
Wilmer	Petitioner	Warroad, MN Baudette, MN Grygla, MN Badger, MN Lancaster, MN Roseau, MN	***	***	***
Wooten's Honey Bees	Petitioner	Crawford, NE Hettinger, ND	***	***	***
All large producers	Various	Various	Count--47	***	***
All small producers	Various	Various	Count--37	***	***
All producers	Petitioner--74; Support--7; Oppose--2	Various	Count--84	100.0	31.2

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 “---“.

As indicated in table III-2, two U.S. producers (*** and ***) are related to a U.S. importer of the subject merchandise (***), and 10 firms reported common ownership or relationships with each other.[8] In addition, 38 of the 84 responding firms reported being members of the SHA cooperative.

Table III-2
Raw honey: U.S. producers' ownership, related and/or affiliated firms

* * * * * * *

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

[8] The following firms reported common ownership or relationships with each other: ***, ***, ***, ***, ***, and ***.

Table III-3 presents U.S. producers' reported changes in operations since January 1, 2018. Several U.S. producers reported reductions in the number of colonies due to colony collapse disorder or *Varroa* mites. Some U.S. producers reported expanding their number of colonies in response to low honey prices while others reported low honey prices as an obstacle to replacing colonies lost during the period of investigation. In addition, several U.S. producers reported issues with labor availability and increasing costs with the H-2A visa program.

Table III-3
Raw honey: Larger U.S. producers' reported changes in operations, since January 1, 2018

Item	Firm name and narrative response on changes in operations
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***

Item	Firm name and narrative response on changes in operations
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Expansion in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Reduction in number of colonies/ hives	***
Began basic filtering operations	***

Item	Firm name and narrative response on changes in operations
Began basic filtering operations	***
Began basic filtering operations	***
Ceased basic filtering operations	***
Ceased basic filtering operations	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Weather related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***

Item	Firm name and narrative response on changes in operations
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***

Item	Firm name and narrative response on changes in operations
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Other (e.g., technology)	***
Other (e.g., technology)	***
Other (e.g., technology)	***
Other (e.g., technology)	***

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

U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' production and production shares, by state and by period as reported by USDA/NASS. Table III-5 presents the same production and production share data but grouped by region.[9] As reported by USDA/NASS, U.S. production of raw honey totaled 154.0 million pounds in 2018, increased to 156.9 million pounds in 2019 (a 1.9 percent increase), declined to 147.6 million pounds in 2020, and then further declined to 126.5 million pounds in 2021 (resulting in a 17.9 percent net decrease in total production from 2018 to 2021).

More than 36 percent of 2020 honey production occurred in North or South Dakota, and eight states (North Dakota, South Dakota, California, Texas, Montana, Florida, Minnesota, and Michigan) were responsible for more than 70 percent of total 2020 U.S. honey production. As presented in Table III-5, the Midwest region accounted for nearly half of 2020 raw honey production in the United States. The next largest honey producing region was the Pacific Coast (representing 13.6 percent of 2020 production), followed by the Mountains region (11.7 percent) and the Southeast region (11.3 percent).

Table III-4
Raw honey: U.S. producers' production, by state and period

Production in 1,000 pounds

State	2018	2019	2020	2021
North Dakota	39,600	33,800	38,610	28,325
South Dakota	11,985	19,440	14,945	12,250
California	13,735	16,080	13,760	9,570
Texas	7,392	7,560	8,949	7,672
Montana	14,720	14,878	8,910	6,669
Florida	10,535	9,225	8,832	8,492
Minnesota	7,259	6,962	5,940	7,125
Michigan	4,268	4,700	4,465	5,151
All other states	44,514	44,277	43,183	41,212
All states	154,008	156,922	147,594	126,466

Table continued.

[9] The following region definitions are used: Northeast: ME, VT, NH, MA, RI, CT, NY, NJ, PA; Midwest: OH, IN, MI, IL, WI, MN, IA, MO, KS, NE, SD, ND; Southeast: MD,DE, WV, VA, KY, NC, SC, TN, GA, FL, AL, MS; Central Southwest: LA, AR, OK, TX; Mountains: CO, NM, AZ, UT, NV, ID, MT, WY; Pacific Coast: WA, OR, CA; and Other: all other U.S. markets, including AK, HI, PR, and VI.

Table III-4 Continued
Raw honey: U.S. producers' production, by state and period

Share of production in percent

State	2018	2019	2020	2021
North Dakota	25.7	21.5	26.2	22.4
South Dakota	7.8	12.4	10.1	9.7
California	8.9	10.2	9.3	7.6
Texas	4.8	4.8	6.1	6.1
Montana	9.6	9.5	6.0	5.3
Florida	6.8	5.9	6.0	6.7
Minnesota	4.7	4.4	4.0	5.6
Michigan	2.8	3.0	3.0	4.1
All other states	28.9	28.2	29.3	32.6
All states	100.0	100.0	100.0	100.0

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

Table III-5
Raw honey: U.S. producers' production, by region and period

Production in 1,000 pounds

Region	2018	2019	2020	2021
Northeast	4,647	5,605	5,176	5,089
Midwest	72,194	74,094	73,244	61,326
Southeast	17,843	17,104	16,620	16,235
Central Southwest	12,527	12,548	12,206	10,668
Mountains	23,346	23,174	17,257	15,096
Pacific Coast	20,301	21,699	20,141	15,308
Other	3,150	2,698	2,950	2,744
All Regions	154,008	156,922	147,594	126,466

Table continued.

Table III-5 Continued
Raw honey: U.S. producers' production, by region and period

Share of production in percent

Region	2018	2019	2020	2021
Northeast	3.0	3.6	3.5	4.0
Midwest	46.9	47.2	49.6	48.5
Southeast	11.6	10.9	11.3	12.8
Central Southwest	8.1	8.0	8.3	8.4
Mountains	15.2	14.8	11.7	11.9
Pacific Coast	13.2	13.8	13.6	12.1
Other	2.0	1.7	2.0	2.2
All Regions	100.0	100.0	100.0	100.0

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

Table III-6 presents U.S. producers' colony numbers and colony shares, by state and by period, as reported by USDA/NASS. Table III-7 presents the same colony and colony share data but by region. U.S. producers' colonies totaled 2.83 million in 2018 and steadily declined to 2.7 million colonies in 2021 (representing a 4.7 percent net decrease in colonies from 2018 to 2021). Like the USDA/NASS production data, the USDA/NASS colony data shows a large share of colonies located in North and South Dakota (with 27.3 percent of the estimated total 2020 colonies). Additionally, California and Florida also have a large estimated concentration of colonies (11.8 and 7.1 percent of total 2020 colonies, respectively).

Table III-6
Raw honey: U.S. producers' number of colonies, by state and period

Number of colonies in 1,000 colonies

State	2018	2019	2020	2021
North Dakota	550	520	495	515
South Dakota	255	270	245	250
California	335	335	320	290
Texas	132	126	157	137
Montana	160	173	110	117
Florida	215	205	192	193
Minnesota	119	118	108	125
Michigan	97	94	95	101
All other states	965	971	984	968
All states	2,828	2,812	2,706	2,696

Table continued.

Table III-6 Continued
Raw honey: U.S. producers' number of colonies, by state and period

Shares in percent

State	2018	2019	2020	2021
North Dakota	19.4	18.5	18.3	19.1
South Dakota	9.0	9.6	9.1	9.3
California	11.8	11.9	11.8	10.8
Texas	4.7	4.5	5.8	5.1
Montana	5.7	6.2	4.1	4.3
Florida	7.6	7.3	7.1	7.2
Minnesota	4.2	4.2	4.0	4.6
Michigan	3.4	3.3	3.5	3.7
All other states	34.1	34.5	36.4	35.9
All states	100.0	100.0	100.0	100.0

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

Table III-7
Raw honey: U.S. producers' number of colonies, by region and period

Number of colonies in 1,000 colonies

Region	2018	2019	2020	2021
Northeast	107	114	107	110
Midwest	1,196	1,177	1,112	1,161
Southeast	386	391	378	378
Central Southwest	205	200	210	191
Mountains	376	381	338	341
Pacific Coast	505	503	513	472
Other	53	46	48	43
All Regions	2,828	2,812	2,706	2,696

Table continued.

Table III-7 Continued
Raw honey: U.S. producers' number of colonies, by state and period

Shares in percent

Region	2018	2019	2020	2021
Northeast	3.8	4.1	4.0	4.1
Midwest	42.3	41.9	41.1	43.1
Southeast	13.6	13.9	14.0	14.0
Central Southwest	7.2	7.1	7.8	7.1
Mountains	13.3	13.5	12.5	12.6
Pacific Coast	17.9	17.9	19.0	17.5
Other	1.9	1.6	1.8	1.6
All Regions	100.0	100.0	100.0	100.0

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

Table III-8 presents U.S. producers' average production per colony, by state and by period as reported by USDA/NASS. Table III-9 presents the same average production per colony but grouped by region. Figure III-1 shows U.S. producers' total production and production per colony by period as reported by USDA/NASS. Average production per colony remained stable at 54.5 pounds per colony between 2018 and 2020 (with a slight increase to 55.8 pounds per colony in 2019) before decreasing to 46.9 pounds per colony in 2021. Among the states, Montana had the highest reported average production per colony with 81.0 pounds per colony in 2020. The Midwest had the highest reported average production per colony of the regions with 65.9 pounds per colony in 2020.

Table III-8
Raw honey: U.S. producers' average yield per colony, by state and period

Yield in pounds per colony

State	2018	2019	2020	2021
North Dakota	72.0	65.0	78.0	55.0
South Dakota	47.0	72.0	61.0	49.0
California	41.0	48.0	43.0	33.0
Texas	56.0	60.0	57.0	56.0
Montana	92.0	86.0	81.0	57.0
Florida	49.0	45.0	46.0	44.0
Minnesota	61.0	59.0	55.0	57.0
Michigan	44.0	50.0	47.0	51.0
All other states	46.1	45.6	43.9	42.6
All states	54.5	55.8	54.5	46.9

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

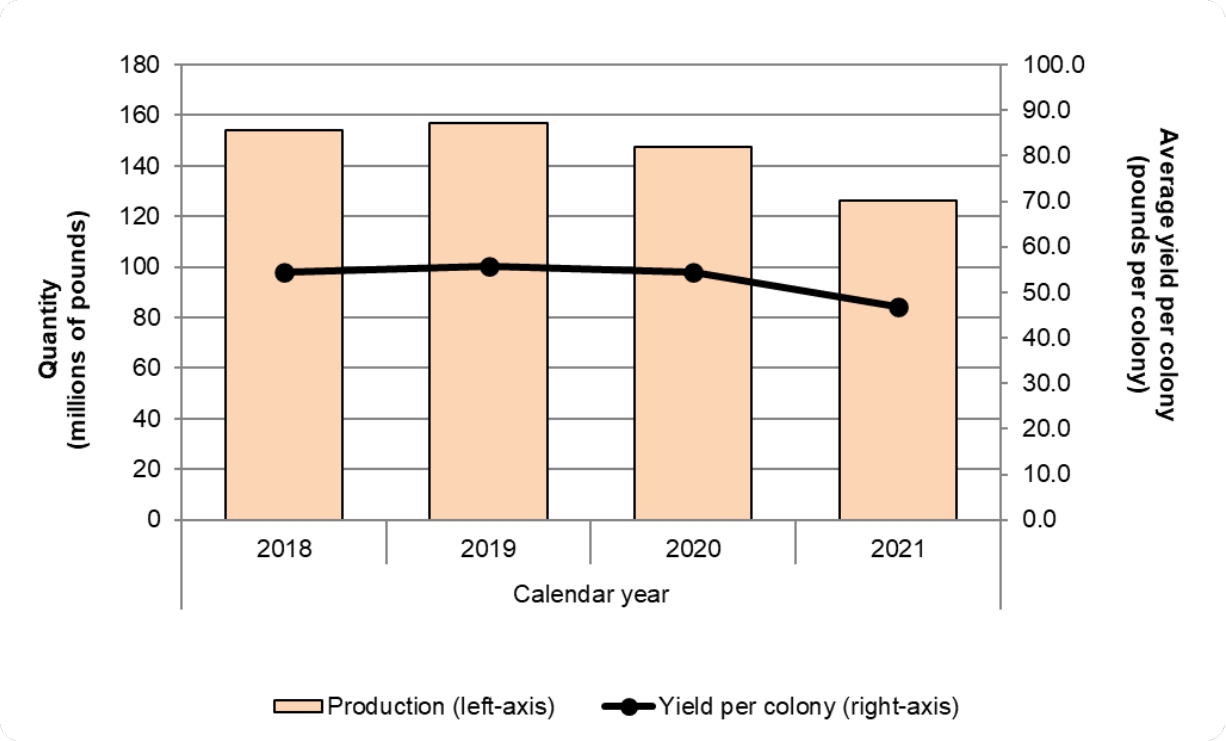
Table III-9
Raw honey: U.S. producers' average yield per colony, by region and period

Yield in pounds per colony

Region	2018	2019	2020	2021
Northeast	43.4	49.2	48.4	46.3
Midwest	60.4	63.0	65.9	52.8
Southeast	46.2	43.7	44.0	42.9
Central Southwest	61.1	62.7	58.1	55.9
Mountains	62.1	60.8	51.1	44.3
Pacific Coast	40.2	43.1	39.3	32.4
Other	59.4	58.7	61.5	63.8
All Regions	54.5	55.8	54.5	46.9

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

Figure III-1
Raw honey: U.S. producers' total production and yield per colony, by period



Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

Table III-10 presents larger U.S. producers' number of colonies, production, and yield in pounds per colony of raw honey production based on questionnaire data. Larger U.S. producers' reported number of colonies increased by about 9,100 colonies (1.8 percent) during 2018-20, while production and yields increased by 2.8 million pounds (7.1 percent) and 6.0 pounds per colony (7.8 percent) during 2018-19 before decreasing by 525,700 pounds (1.2 percent) and 3.0 pounds per colony (3.6 percent) during 2019-20. Larger U.S. producers' production and yields were 7.9 million pounds (21.0 percent) lower and 18.5 pounds per colony (24.8 percent) lower respectively during January-September 2021 compared to January-September 2020.

Table III-11 presents both larger and smaller U.S. producers' number of colonies, production, and yield in pounds per colony. Smaller U.S. producers' production and yields increased by about 878,000 pounds (19.7 percent) and 13.1 pounds per colony (19.5 percent) during 2018-19, then decreased by about 932,000 pounds (17.5 percent) and 9.2 pounds per colony (11.4 percent) during 2019-20. Smaller U.S. producers' reported colonies remained steady during 2018-19 then decreased by about 5,000 colonies (6.9 percent) during 2019-20.

Table III-10
Raw honey: Larger U.S. producers' number of colonies, production and yield, by period

Production in 1,000 pounds; Colonies in 1,000 colonies; Yield in pounds per colony

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Production	39,414	42,214	41,688	37,835	29,888
Colonies	511	508	520	508	533
Yield	77.1	83.1	80.2	74.5	56.0

Source: Compiled data submitted in response to Commission questionnaires.

Table III-11
Raw honey: U.S. producers' number of colonies, production and yield, by producer size and period

Production in 1,000 pounds; Colonies in 1,000 colonies; Yield in pounds per colony

Item	Producer type	2018	2019	2020
Production	Large	39,414	42,214	41,688
Production	Small	4,450	5,328	4,396
Production	All sizes	43,864	47,542	46,085
Colonies	Large	511	508	520
Colonies	Small	66	66	61
Colonies	All sizes	577	574	581
Yield	Large	77.1	83.1	80.2
Yield	Small	67.6	80.7	71.5
Yield	All sizes	76.1	82.9	79.3

Source: Compiled data submitted in response to Commission questionnaires.

Table III-12 presents U.S. producers' colony/hive activity by month and activity type. Most U.S. producers reported engaging in commercial pollination during January-March, raw honey production during April-September, and then other activities during October-December.[10]

Table III-12
Raw honey: Count of U.S. producers indicating colony/hive activity, by month and activity type

Count in number of firms reporting

Month	Raw honey production	Commercial pollination	Other
January	15	33	33
February	14	60	16
March	15	56	19
April	39	13	29
May	59	8	23
June	73	8	7
July	75	6	5
August	75	6	4
September	64	2	11
October	33	1	34
November	21	8	42
December	16	12	45

Source: Compiled data submitted in response to Commission questionnaires.

[10] U.S. producer *** stated honey production in South Dakota takes place during June-August while shipment of honey is dependent on when the crop is sold. ***'s producer questionnaire response, section III-7.

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

Table III-13 presents U.S. producers' U.S. shipments, export shipments, and total shipments by quantity and value based on USDA/NASS and Census data. U.S. producers' U.S. shipments decreased irregularly between 2018 and 2020 with U.S. shipments increasing from 150.8 million pounds in 2018 to 153.2 million pounds in 2019 (a 1.6 percent increase) and then decreasing to 141.7 million pounds in 2020 (for a net decline of 6.0 percent from 2018 to 2020). U.S. producers' U.S. shipments were 11.6 million pounds (14.1 percent) lower during January-September 2021 compared to January-September 2020. By value, U.S. shipment values decreased from $335.1 million in 2018, to $307.2 million in 2019, and to $301.6 million in 2020 (representing a net decline of 10.0 percent from 2018 to 2020). U.S. shipment values were $6.9 million (4.0 percent) higher during January-September 2021 compared to January-September 2020.

Export shipments increased from 3.2 million pounds in 2018 to 5.9 million pounds in 2020 (representing an 82.7 percent increase from 2018-20) but were about 472,000 pounds (11.9 percent) lower during January-September 2021 compared to January-September 2020. Export shipment values increased irregularly from $5.2 million in 2018, then decreased to $5.1 million in 2019, and increased to $8.4 million in 2020 (representing a 59.9 percent increase from 2018 to 2020). Export shipment values were slightly lower, by about $18,000 (0.3 percent), during January-September 2021 compared to January-September 2020.

Total shipment values decreased from 2018 to 2020: from $340.4 million in 2018 to $312.3 million in 2019 and to $309.9 million in 2020 (representing an 8.9 percent total decrease in total shipment values from 2018 to 2020).

Unit values for U.S. shipments, export shipments, and total shipments all decreased between 2018 and 2020 (by 4.2, 12.4, and 5.0 percent, respectively) but were higher (21.0, 13.2, and 20.8 percent, respectively) during January-September 2021 compared to January-September 2020. U.S. producers' export shipments as a share of U.S. producers' total shipments was between 2.1 and 4.0 percent by quantity and 1.5 and 2.7 percent by value between 2018 and 2020.

Table III-13
Raw honey: U.S. producers' shipments by location of shipment, by period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pounds; shares in percent

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
U.S. shipments	Quantity	150,778	153,222	141,694	82,357	70,732
Export shipments	Quantity	3,230	3,700	5,900	3,966	3,494
Total shipments	Quantity	154,008	156,922	147,594	86,324	74,226
U.S. shipments	Value	335,134	307,192	301,592	175,295	182,237
Export shipments	Value	5,224	5,083	8,355	5,578	5,560
Total shipments	Value	340,358	312,275	309,947	180,873	187,798
U.S. shipments	Unit value	2.22	2.00	2.13	2.13	2.58
Export shipments	Unit value	1.62	1.37	1.42	1.41	1.59
Total shipments	Unit value	2.21	1.99	2.10	2.10	2.53
U.S. shipments	Share of quantity	97.9	97.6	96.0	95.4	95.3
Export shipments	Share of quantity	2.1	2.4	4.0	4.6	4.7
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	98.5	98.4	97.3	96.9	97.0
Export shipments	Share of value	1.5	1.6	2.7	3.1	3.0
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Source: Total shipments based on utilized production data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022, and export shipments based on domestic U.S. exports reported by the Census Bureau of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022.

Note: Partial year period U.S. shipments are derived using the full year NASS data for 2020 and 2021 adjusted down for the partial year period using the share of annual U.S. producer shipments reported between January to September in questionnaire responses to the preliminary investigation.

Table III-14 presents larger U.S. producers' U.S. shipments by type as reported by the U.S. producers that provided questionnaire responses. As discussed above, 38 of the 84 responding U.S. producers were members of the SHA which operates on a cooperative basis to process, pack, and market honey for its beekeeper members.[11] The SHA cooperative requires its members to ship the vast majority of their shipments to the cooperative. Larger U.S. producers categorized between 32.8 and 51.8 percent of their U.S. shipments by quantity and between 27.5 and 45.5 percent of their U.S. shipments by value as commercial shipments to cooperatives from January 2018 to September 2021. Comparatively, larger U.S. producers categorized between 41.3 and 60.3 percent of their U.S. shipments by quantity and between 46.0 and 63.7 percent of their U.S. shipments by value as commercial shipments to non-

[11] Over 200 independent beekeepers are SHA members. *SHA webpage,* https://siouxhoney.com/our-honey/, retrieved March 28, 2022.

cooperatives from January 2018 to September 2021. Throughout the period of investigation, less than seven percent of larger U.S. producers' reported U.S. shipments by quantity were transfers to related firms or internally consumed.

The share of larger U.S. producers' commercial shipments to cooperatives by quantity decreased by *** percentage points during 2018-20 and was *** percentage points lower during January-September 2021 compared to January-September 2020.[12] The share of larger U.S. producers' commercial shipments to non-cooperatives by quantity increased by *** percentage points during 2018-20 and was *** percentage points higher during January-September 2021 compared to January-September 2020. Unit values for larger U.S. producers' commercial shipments to non-cooperatives declined during 2018-20 but were higher during January-September 2021 compared to January-September 2020 and were consistently higher than unit values for shipments to cooperative firms throughout the period of investigation.

Table III-14
Raw honey: Larger U.S. producers' U.S. shipments, by type and period

Quantity in 1,000 pounds; Value in 1,000 dollars

U.S. shipments type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Commercial to cooperatives	Quantity	***	***	***	***	***
Commercial to all other	Quantity	***	***	***	***	***
All commercial	Quantity	32,680	32,049	35,432	27,673	31,121
Internal consumption for retail packaging	Quantity	***	***	***	***	***
Internal consumption for all other	Quantity	***	***	***	***	***
All internal consumption	Quantity	1,228	1,356	1,133	982	1,020
Transfers to related firms	Quantity	1,220	1,025	1,202	1,039	1,301
All U.S. shipments	Quantity	35,128	34,431	37,768	29,694	33,442
Commercial to cooperatives	Value	***	***	***	***	***
Commercial to all other	Value	***	***	***	***	***
All commercial	Value	57,021	48,791	54,872	42,843	51,395
Internal consumption for retail packaging	Value	***	***	***	***	***
Internal consumption for all other	Value	***	***	***	***	***
All internal consumption	Value	2,689	2,853	2,500	2,099	2,287
Transfers to related firms	Value	2,611	2,269	2,223	1,897	2,689
All U.S. shipments	Value	62,320	53,913	59,595	46,839	56,371

[12] U.S. producers *** and *** reported ending their SHA membership during the period of investigation. *** stated they could not make enough money as a member due to import prices. *** stated they ended their membership due to the co-op's payment over time to beekeepers and the possibility that the price offered by SHA would decline. ***'s producer questionnaire response, section IV-19. Email from ***.

Table III-14 Continued
Raw honey: Larger U.S. producers' shipments by location of shipment, by period

Unit values in dollars per pound

U.S. shipments type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Commercial to cooperatives	Unit value	***	***	***	***	***
Commercial to all other	Unit value	***	***	***	***	***
All commercial	Unit value	1.74	1.52	1.55	1.55	1.65
Internal consumption for retail packaging	Unit value	***	***	***	***	***
Internal consumption for all other	Unit value	***	***	***	***	***
All internal consumption	Unit value	2.19	2.10	2.21	2.14	2.24
Transfers to related firms	Unit value	2.14	2.21	1.85	1.82	2.07
All U.S. shipments	Unit value	1.77	1.57	1.58	1.58	1.69

Table continued.

Table III-14 Continued
Raw honey: Larger U.S. producers' shipments by location of shipment, by period

Shares in percent

U.S. shipments type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Commercial to cooperatives	Share of quantity	***	***	***	***	***
Commercial to all other	Share of quantity	***	***	***	***	***
All commercial	Share of quantity	93.0	93.1	93.8	93.2	93.1
Internal consumption for retail packaging	Share of quantity	***	***	***	***	***
Internal consumption for all other	Share of quantity	***	***	***	***	***
All internal consumption	Share of quantity	3.5	3.9	3.0	3.3	3.0
Transfers to related firms	Share of quantity	3.5	3.0	3.2	3.5	3.9
All U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial to cooperatives	Share of value	***	***	***	***	***
Commercial to all other	Share of value	***	***	***	***	***
All commercial	Share of value	91.5	90.5	92.1	91.5	91.2
Internal consumption for retail packaging	Share of value	***	***	***	***	***
Internal consumption for all other	Share of value	***	***	***	***	***
All internal consumption	Share of value	4.3	5.3	4.2	4.5	4.1
Transfers to related firms	Share of value	4.2	4.2	3.7	4.0	4.8
All U.S. shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table III-15
Raw honey: U.S. producers' U.S. shipments, by producer size and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit value in dollars per pound; Shares in percent

Producer type	Measure	2018	2019	2020
Large	Quantity	35,128	34,431	37,768
Small	Quantity	4,081	4,760	3,953
All sizes	Quantity	39,209	39,191	41,721
Large	Value	62,320	53,913	59,595
Small	Value	7,712	7,824	6,673
All sizes	Value	70,032	61,737	66,268
Large	Unit value	1.77	1.57	1.58
Small	Unit value	1.89	1.64	1.69
All sizes	Unit value	1.79	1.58	1.59
Large	Share of quantity	89.6	87.9	90.5
Small	Share of quantity	10.4	12.1	9.5
All sizes	Share of quantity	100.0	100.0	100.0
Large	Share of value	89.0	87.3	89.9
Small	Share of value	11.0	12.7	10.1
All sizes	Share of value	100.0	100.0	100.0

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

Captive consumption

Section 771(7)(C)(iv) of the Act states that–[13]

> *If domestic producers internally transfer significant production of the domestic like product for the production of a downstream article and sell significant production of the domestic like product in the merchant market, and the Commission finds that–*
>
> *(I) the domestic like product produced that is internally transferred for processing into that downstream article does not enter the merchant market for the domestic like product,*
>
> *(II) the domestic like product is the predominant material input in the production of that downstream article, and*
>
> *then the Commission, in determining market share and the factors affecting financial performance . . ., shall focus primarily on the merchant market for the domestic like product.*

Transfers and sales

As reported in table III-14 above, internal consumption accounted for between 3.0 percent and 3.9 percent of U.S. producers' U.S. shipments of raw honey. [14]

First statutory criterion in captive consumption

The first requirement for application of the captive consumption provision is that the domestic like product that is internally transferred for processing into that downstream article not enter the merchant market for the domestic like product. As reported in table III-16, during the period of investigation the share of larger U.S. producers' reported internal consumption that was subsequently sold as is (i.e. as merchandise that was diverted back into the market for raw honey) ranged between *** percent and *** percent while the combined share of larger U.S. producers' reported internal consumption that was packaged into retail size containers or processed into retail honey (i.e. went into the production of downstream products) ranged between *** and *** percent.

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

[14] During the preliminary phase, responding U.S. producers generally categorized their U.S. shipments to cooperatives as non-commercial (as internal consumption or transfers to related firms). Preliminary publication, p. III-22. During the final phase, staff requested U.S. producers report their shipments to cooperatives as commercial shipments.

Table III-16
Raw honey: Larger U.S. producers' internal consumption and transfers to related firms by disposition

Quantity in 1,000 pounds; Shares in percent

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Sold as is (raw honey)	Quantity	***	***	***	***	***
Packaged into retail containers <= 5 lbs.	Quantity	***	***	***	***	***
Processed into retail honey	Quantity	***	***	***	***	***
Unaccounted for	Quantity	***	***	***	***	***
All non-commercial transactions	Quantity	***	***	***	***	***
Sold as is (raw honey)	Share	***	***	***	***	***
Packaged into retail containers <= 5 lbs.	Share	***	***	***	***	***
Processed into retail honey	Share	***	***	***	***	***
Unaccounted for	Share	***	***	***	***	***
All non-commercial transactions	Share	100.0	100.0	100.0	100.0	100.0

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

Second statutory criterion in captive consumption

The second criterion of the captive consumption provision concerns whether the domestic like product is the predominant material input in the production of the downstream article that is captively produced. With respect to the downstream articles resulting from captive production, raw honey reportedly comprises 89.2 percent of the finished cost of downstream products.

Table III-17
Raw honey: U.S. producers' share of raw honey accounted or out of all material inputs into retail honey, 2020

Shares in percent

Item	Share of value	Share of quantity
Raw honey	89.2	94.0
Other material inputs	10.8	6.0
All material inputs	100.0	100.0

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

U.S. producers' inventories

Table III-18 present larger U.S. producers' end-of-period inventories and the ratio of these inventories to larger U.S. producers' production, U.S. shipments, and total shipments**.** Table III-19 presents inventory data by producer size and period.[15] Larger U.S. producers' end-of-period inventories increased by 11.6 million pounds (149.8 percent) during 2018-20 but were 7.0 million pounds (31.5 percent) lower in September 2021 compared to September 2020. The ratio of larger U.S. producers' inventories to U.S. production and shipments increased by 26.7 percentage points and 29.2 percentage points, respectively.

During 2018-20, smaller U.S. producers' end-of-period inventories increased by about 120,000 pounds while their ratio of end-of-period inventories to U.S. production and U.S. shipments increased by 2.8 percentage points and 3.3 percentage points, respectively.

Table III-18
Raw honey: Larger U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pounds; shares in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
End-of-period inventory quantity	7,740	14,779	19,335	22,238	15,233
Inventory ratio to U.S. production	19.6	35.0	46.4	58.8	51.0
Inventory ratio to U.S. shipments	22.0	42.9	51.2	56.2	34.2
Inventory ratio to total shipments	22.0	42.9	51.2	56.2	34.2

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

Table III-19
Raw honey: U.S. producers' inventories and their ratio to select items, by producer size and period

Quantity in 1,000 pounds; inventory ratios in percent

Item	Producer type	2018	2019	2020
End-of-period inventory quantity	Large	7,740	14,779	19,335
Inventory ratio to U.S. production	Large	19.6	35.0	46.4
Inventory ratio to U.S. shipments	Large	22.0	42.9	51.2
Inventory ratio to total shipments	Large	22.0	42.9	51.2
End-of-period inventory quantity	Small	272	330	392
Inventory ratio to U.S. production	Small	6.1	6.2	8.9
Inventory ratio to U.S. shipments	Small	6.7	6.9	9.9
End-of-period inventory quantity	All sizes	8,012	15,109	19,728
Inventory ratio to U.S. production	All sizes	18.3	31.8	42.8
Inventory ratio to U.S. shipments	All sizes	20.4	38.6	47.3

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

[15] Appendix G presents U.S. producer inventory data including full year 2021 as reported by NASS.

U.S. producers' imports and purchases

Two related U.S. producers, *** and ***, reported imports of raw honey from a related importer during the period of investigation. ***'s imports of raw honey are presented in table III-20 while ***'s imports of raw honey are presented in table III-21. ***'s and ***'s reasons for importing are presented in table III-22.

Table III-20
Raw honey: *'s U.S. production, U.S. imports, and ratio of imports to production by period**

Quantity in 1,000 pounds; inventory ratios in percent

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
U.S. production	Quantity	***	***	***	***	***
Related importer *** imports from Brazil	Quantity	***	***	***	***	***
Imports from Brazil 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 "---".

Note: ***

Table III-21
Raw honey: *'s U.S. production, U.S. imports, and ratio of imports to production by period**

Quantity in 1,000 pounds; inventory ratios in percent

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
U.S. production	Quantity	***	***	***	***	***
Related importer *** imports from Brazil	Quantity	***	***	***	***	***
Imports from Brazil 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 "---".

Note: ***

Table III-22
Raw honey: U.S. producers' reasons for importing; by firm

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

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

U.S. employment, wages, and productivity

Table III-23 shows larger U.S. producers' employment-related data while tables III-24 and table III-25 show employment-related data for smaller U.S. producers' and all U.S. producers respectively.

Table III-23
Raw honey: Larger U.S. producers' employment related information, by item, worker type and period

Item	Worker type	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Production and related workers (PRWs) (number)	Compensated	***	***	***	***	***
Total hours worked (1,000 hours)	Compensated	***	***	***	***	***
Wages paid ($1,000)	Compensated	***	***	***	***	***
Hours worked per PRW (hours)	Compensated	***	***	***	***	***
Hourly wages (dollars per hour)	Compensated	***	***	***	***	***
Production and related workers (PRWs) (number)	Non-compensated	***	***	***	***	***
Total hours worked (1,000 hours)	Non-compensated	***	***	***	***	***
Estimated wages paid ($1,000)	Non-compensated	***	***	***	***	***
Hours worked per PRW (hours)	Non-compensated	***	***	***	***	***
Estimated hourly wages (dollars per hour)	Non-compensated	***	***	***	***	***

Table continued.

Table III-23 Continued
Raw honey: Larger U.S. producers' employment related information, by item, worker type and period

Item	Worker type	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Production and related workers (PRWs) (number)	All workers	1,112	1,168	1,165	1,154	1,132
Total hours worked (1,000 hours)	All workers	1,928	2,003	2,005	1,621	1,598
Wages paid ($1,000)	All workers	37,865	39,547	42,264	31,344	30,899
Hours worked per PRW (hours)	All workers	1,734	1,715	1,721	1,404	1,411
Hourly wages (dollars per hour)	All workers	$19.64	$19.74	$21.08	$19.34	$19.34
Productivity (pounds per hour)	All workers	20.4	21.1	20.8	23.3	18.7
Unit labor costs (dollars per pound)	All workers	$0.96	$0.94	$1.01	$0.83	$1.03

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

Note: Wage based metrics for non-compensated workers were estimated using the company's reported number of hours worked by non-compensated workers and the company's average hourly wages of compensated workers. The all workers total then combines the reported wages for compensated workers and estimated non-compensated worker wages.

Table III-24
Raw honey: Smaller U.S. producers' employment related information, by item and period

Item	2018	2019	2020
Production and related workers (PRWs) (number)	181	190	195
Total hours worked (1,000 hours)	267	296	294
Hours worked per PRW (hours)	1,477	1,556	1,507
Wages paid ($1,000)	5,248	5,832	6,193
Hourly wages (dollars per hour)	$19.63	$19.73	$21.07
Productivity (pounds per hour)	16.6	18.0	15.0
Unit labor costs (dollars per pound)	$1.18	$1.09	$1.41

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

Note: Small producers wages paid are derived using their reported hours worked and the average hourly wages of compensated workers for large U.S. producers.

Table III-25
Raw honey: All U.S. producers' employment related information, by item and period

Item	2018	2019	2020
Production and related workers (PRWs) (number)	1,293	1,358	1,360
Total hours worked (1,000 hours)	2,196	2,299	2,299
Hours worked per PRW (hours)	1,698	1,693	1,691
Wages paid ($1,000)	43,114	45,379	48,456
Hourly wages (dollars per hour)	$19.64	$19.74	$21.07
Productivity (pounds per hour)	20.0	20.7	20.0
Unit labor costs (dollars per pound)	$0.98	$0.95	$1.05

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

Note: Wage based metrics for all U.S. producers include large producer compensated, the estimated large producer non-compensated, and derived small producers' wage data.

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

U.S. importers

The Commission issued importer questionnaires to 43 firms believed to be importers of subject raw honey, as well as to all U.S. producers of raw honey.[1] Usable questionnaire responses were received from 25 companies, representing 97.0 percent of U.S. imports in 2020 under HTS statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065.[2] Table IV-1 lists all responding U.S. importers of raw honey from Argentina, Brazil, India, Vietnam and other sources, their locations, and their shares of U.S. imports, in 2020.

[1] The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data from third-party sources, may have accounted for more than one percent of total imports under HTS statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065 in 2018-20.

[2] Usable questionnaire responses represented 101.5 percent of U.S. imports from subject sources and 71.8 percent of U.S. imports from nonsubject sources in 2020 under HTS statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065.

Table IV-1
Raw honey: U.S. importers, their headquarters, and share of imports within each source, 2020

Share in percent

Firm	Headquarters	Argentina	Brazil	India	Vietnam
Apis Nativa	Ararangua, BR	***	***	***	***
Barkman Honey	Hillsboro, KS	***	***	***	***
Bees Brothers	Coral Gables, FL	***	***	***	***
Best Food Supplies	Coral Gables, FL	***	***	***	***
Bloom Honey	Westlake Village, CA	***	***	***	***
Burleson's	Waxahachie, TX	***	***	***	***
CM Goettsche	Basking Ridge, NJ	***	***	***	***
Delta Food	Laguna Niguel, CA	***	***	***	***
GloryBee	Eugene, OR	***	***	***	***
Honey Solutions	Baytown, TX	***	***	***	***
Honey Tree	Onsted, MI	***	***	***	***
Honeywheel	Gilbert, AZ	***	***	***	***
Impex	Tustin, CA	***	***	***	***
Lamex	Bloomington, MN	***	***	***	***
Natural Honey Importers	North Brunswick, NJ	***	***	***	***
Odem	Rosemere, QC	***	***	***	***
Prairie	Hillsboro, KS	***	***	***	***
Pure Sweet Honey	Verona, WI	***	***	***	***
Queen of America	Belleview, FL	***	***	***	***
Sarah Impex	Green Brook, NJ	***	***	***	***
Smitty Bee Honey	Defiance, IA	***	***	***	***
Sunland Trading	New Canaan, CT	***	***	***	***
Sweet Harvest Foods	Cannon Falls, MN	***	***	***	***
Toshoku America	Irvine, CA	***	***	***	***
Wholesome Sweeteners	Sugar Land, TX	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0

Table continued.

Table IV-1 Continued
Raw honey: U.S. importers, their headquarters, and share of imports within each source, 2020

Share in percent

Firm	Headquarters	Subject sources	Nonsubject Sources	All import sources
Apis Nativa	Ararangua, BR	***	***	***
Barkman Honey	Hillsboro, KS	***	***	***
Bees Brothers	Coral Gables, FL	***	***	***
Best Food Supplies	Coral Gables, FL	***	***	***
Bloom Honey	Westlake Village, CA	***	***	***
Burleson's	Waxahachie, TX	***	***	***
CM Goettsche	Basking Ridge, NJ	***	***	***
Delta Food	Laguna Niguel, CA	***	***	***
GloryBee	Eugene, OR	***	***	***
Honey Solutions	Baytown, TX	***	***	***
Honey Tree	Onsted, MI	***	***	***
Honeywheel	Gilbert, AZ	***	***	***
Impex	Tustin, CA	***	***	***
Lamex	Bloomington, MN	***	***	***
Natural Honey Importers	North Brunswick, NJ	***	***	***
Odem	Rosemere, QC	***	***	***
Prairie	Hillsboro, KS	***	***	***
Pure Sweet Honey	Verona, WI	***	***	***
Queen of America	Belleview, FL	***	***	***
Sarah Impex	Green Brook, NJ	***	***	***
Smitty Bee Honey	Defiance, IA	***	***	***
Sunland Trading	New Canaan, CT	***	***	***
Sweet Harvest Foods	Cannon Falls, MN	***	***	***
Toshoku America	Irvine, CA	***	***	***
Wholesome Sweeteners	Sugar Land, TX	***	***	***
All firms	Various	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. Data shown as "---" represents an item for which no information was reported, whether that be a true zero, null, or non-response.

U.S. imports

Table IV-2, table IV-3, and figure IV-1 present data for U.S. imports of raw honey from Argentina, Brazil, India, Vietnam, and all other sources. During 2018-20, imports from Argentina and Brazil increased by 9.7 percent and 44.9 percent, respectively, with most of the growth occurring in 2020.[3] During 2018-19, imports from India increased by 13.6 percent but then decreased by 24.4 percent during 2019-20 for a net decrease of 14.1 percent during 2018-20. During 2018-19, imports from Vietnam decreased by 5.6 percent but then increased by 36.6 percent during 2019-20 for a net increase of 29.0 percent during 2018-20.[4] U.S imports from all subject sources were higher during January-September 2021 compared to January-September 2020. U.S. imports from combined subject sources increased by 13.5 percent during 2018-20 and were 29.2 percent higher during January-September 2021 compared to January-September 2020. In contrast, the quantity of U.S. imports from nonsubject sources decreased by 26.7 percent during 2018-20, reflecting a 73.7 percent decrease in imports from Canada, and were 15.5 percent lower during January-September 2021 compared to January-September 2020. U.S. imports from all sources decreased by 4.3 percent during 2018-19 before increasing by 9.4 percent during 2019-20. The share of imports by quantity from subject sources increased from 78.1 percent in 2018 to 89.8 percent during January-September 2021. The ratio of imports from subject sources to U.S. production increased from 204.1 percent in 2018 to 241.8 percent in 2020.

Unit values for imports from Argentina decreased by 7.2 percent during 2018-19, then increased by 6.4 percent during 2019-20, and were 50.1 percent higher during January-September 2021 compared to January-September 2020. During 2018-20, unit values for imports from Brazil, India, and Vietnam decreased by 38.4 percent, 9.9 percent, and 14.2 percent, respectively. Unit values for combined subject sources decreased by 15.6 percent during 2018-20 but were 43.6 percent higher during January-September 2021 compared to January-September 2020. Unit values for combined nonsubject sources remained relatively stable during 2018-20 and were 37.2 percent higher during January-September 2021 compared to January-September 2020.

[3] U.S. importer *** stated its 2020 sales volume and imports increased by 22 percent year-over-year due to the hoarding of food products. *** importer questionnaire response, section II-2b.

[4] U.S. importer *** stated honey imports from Asia struggled to enter the United States due to an investigation on honey imports launched by CBP in 2018. *** importer questionnaire response, section II-2a.

Table IV-2
Raw honey: U.S. imports by source and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound

Source	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Argentina	Quantity	79,839	80,382	87,574	68,139	78,703
Brazil	Quantity	52,009	52,693	75,371	59,068	68,843
India	Quantity	96,215	109,312	82,617	65,566	106,903
Vietnam	Quantity	86,325	81,526	111,356	81,063	99,475
Subject sources	Quantity	314,387	323,913	356,918	273,836	353,925
Canada	Quantity	33,216	17,010	8,735	6,891	3,983
Ukraine	Quantity	18,168	19,051	24,161	16,652	12,883
All other sources	Quantity	36,676	25,134	31,631	23,929	23,256
Nonsubject sources	Quantity	88,061	61,196	64,528	47,473	40,122
All import sources	Quantity	402,448	385,109	421,446	321,309	394,047
Argentina	Value	89,457	83,588	96,880	73,591	127,592
Brazil	Value	81,982	58,128	73,220	54,657	109,415
India	Value	81,011	86,271	62,641	49,858	105,647
Vietnam	Value	61,769	52,830	68,358	49,519	79,950
Subject sources	Value	314,218	280,817	301,100	227,624	422,605
Canada	Value	46,980	24,355	13,106	10,018	7,369
Ukraine	Value	17,067	17,381	20,139	13,799	13,296
All other sources	Value	66,766	53,606	61,372	46,967	61,414
Nonsubject sources	Value	130,813	95,342	94,618	70,784	82,079
All import sources	Value	445,031	376,160	395,718	298,408	504,684
Argentina	Unit value	1.12	1.04	1.11	1.08	1.62
Brazil	Unit value	1.58	1.10	0.97	0.93	1.59
India	Unit value	0.84	0.79	0.76	0.76	0.99
Vietnam	Unit value	0.72	0.65	0.61	0.61	0.80
Subject sources	Unit value	1.00	0.87	0.84	0.83	1.19
Canada	Unit value	1.41	1.43	1.50	1.45	1.85
Ukraine	Unit value	0.94	0.91	0.83	0.83	1.03
All other sources	Unit value	1.82	2.13	1.94	1.96	2.64
Nonsubject sources	Unit value	1.49	1.56	1.47	1.49	2.05
All import sources	Unit value	1.11	0.98	0.94	0.93	1.28

Table continued.

Table IV-2 Continued
Raw honey: U.S. imports by source and period

Share in percent

Source	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Argentina	Share of quantity	19.8	20.9	20.8	21.2	20.0
Brazil	Share of quantity	12.9	13.7	17.9	18.4	17.5
India	Share of quantity	23.9	28.4	19.6	20.4	27.1
Vietnam	Share of quantity	21.4	21.2	26.4	25.2	25.2
Subject sources	Share of quantity	78.1	84.1	84.7	85.2	89.8
Canada	Share of quantity	8.3	4.4	2.1	2.1	1.0
Ukraine	Share of quantity	4.5	4.9	5.7	5.2	3.3
All other sources	Share of quantity	9.1	6.5	7.5	7.4	5.9
Nonsubject sources	Share of quantity	21.9	15.9	15.3	14.8	10.2
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Argentina	Share of value	20.1	22.2	24.5	24.7	25.3
Brazil	Share of value	18.4	15.5	18.5	18.3	21.7
India	Share of value	18.2	22.9	15.8	16.7	20.9
Vietnam	Share of value	13.9	14.0	17.3	16.6	15.8
Subject sources	Share of value	70.6	74.7	76.1	76.3	83.7
Canada	Share of value	10.6	6.5	3.3	3.4	1.5
Ukraine	Share of value	3.8	4.6	5.1	4.6	2.6
All other sources	Share of value	15.0	14.3	15.5	15.7	12.2
Nonsubject sources	Share of value	29.4	25.3	23.9	23.7	16.3
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-2 Continued
Raw honey: U.S. imports by source and period

Change in percent

Source	Measure	2018-20	2018-19	2019-20	Jan-Sep 2020-21
Argentina	%Δ Quantity	▲9.7	▲0.7	▲8.9	▲15.5
Brazil	%Δ Quantity	▲44.9	▲1.3	▲43.0	▲16.5
India	%Δ Quantity	▼(14.1)	▲13.6	▼(24.4)	▲63.0
Vietnam	%Δ Quantity	▲29.0	▼(5.6)	▲36.6	▲22.7
Subject sources	%Δ Quantity	▲13.5	▲3.0	▲10.2	▲29.2
Canada	%Δ Quantity	▼(73.7)	▼(48.8)	▼(48.6)	▼(42.2)
Ukraine	%Δ Quantity	▲33.0	▲4.9	▲26.8	▼(22.6)
All other sources	%Δ Quantity	▼(13.8)	▼(31.5)	▲25.8	▼(2.8)
Nonsubject sources	%Δ Quantity	▼(26.7)	▼(30.5)	▲5.4	▼(15.5)
All import sources	%Δ Quantity	▲4.7	▼(4.3)	▲9.4	▲22.6
Argentina	%Δ Value	▲8.3	▼(6.6)	▲15.9	▲73.4
Brazil	%Δ Value	▼(10.7)	▼(29.1)	▲26.0	▲100.2
India	%Δ Value	▼(22.7)	▲6.5	▼(27.4)	▲111.9
Vietnam	%Δ Value	▲10.7	▼(14.5)	▲29.4	▲61.5
Subject sources	%Δ Value	▼(4.2)	▼(10.6)	▲7.2	▲85.7
Canada	%Δ Value	▼(72.1)	▼(48.2)	▼(46.2)	▼(26.4)
Ukraine	%Δ Value	▲18.0	▲1.8	▲15.9	▼(3.6)
All other sources	%Δ Value	▼(8.1)	▼(19.7)	▲14.5	▲30.8
Nonsubject sources	%Δ Value	▼(27.7)	▼(27.1)	▼(0.8)	▲16.0
All import sources	%Δ Value	▼(11.1)	▼(15.5)	▲5.2	▲69.1
Argentina	%Δ Unit value	▼(1.3)	▼(7.2)	▲6.4	▲50.1
Brazil	%Δ Unit value	▼(38.4)	▼(30.0)	▼(11.9)	▲71.8
India	%Δ Unit value	▼(9.9)	▼(6.3)	▼(3.9)	▲30.0
Vietnam	%Δ Unit value	▼(14.2)	▼(9.4)	▼(5.3)	▲31.6
Subject sources	%Δ Unit value	▼(15.6)	▼(13.3)	▼(2.7)	▲43.6
Canada	%Δ Unit value	▲6.1	▲1.2	▲4.8	▲27.3
Ukraine	%Δ Unit value	▼(11.3)	▼(2.9)	▼(8.6)	▲24.5
All other sources	%Δ Unit value	▲6.6	▲17.2	▼(9.0)	▲34.5
Nonsubject sources	%Δ Unit value	▼(1.3)	▲4.9	▼(5.9)	▲37.2
All import sources	%Δ Unit value	▼(15.1)	▼(11.7)	▼(3.9)	▲37.9

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

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.

Table IV-3
Raw honey: U.S. imports ratio to NASS U.S. production, by source and period

Ratios in percent

Source	Measure	2018	2019	2020
Argentina	Ratio	51.8	51.2	59.3
Brazil	Ratio	33.8	33.6	51.1
India	Ratio	62.5	69.7	56.0
Vietnam	Ratio	56.1	52.0	75.4
Subject sources	Ratio	204.1	206.4	241.8
Canada	Ratio	21.6	10.8	5.9
Ukraine	Ratio	11.8	12.1	16.4
All other sources	Ratio	23.8	16.0	21.4
Nonsubject sources	Ratio	57.2	39.0	43.7
All import sources	Ratio	261.3	245.4	285.5

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022. U.S. import statistics are based on imports for consumption.

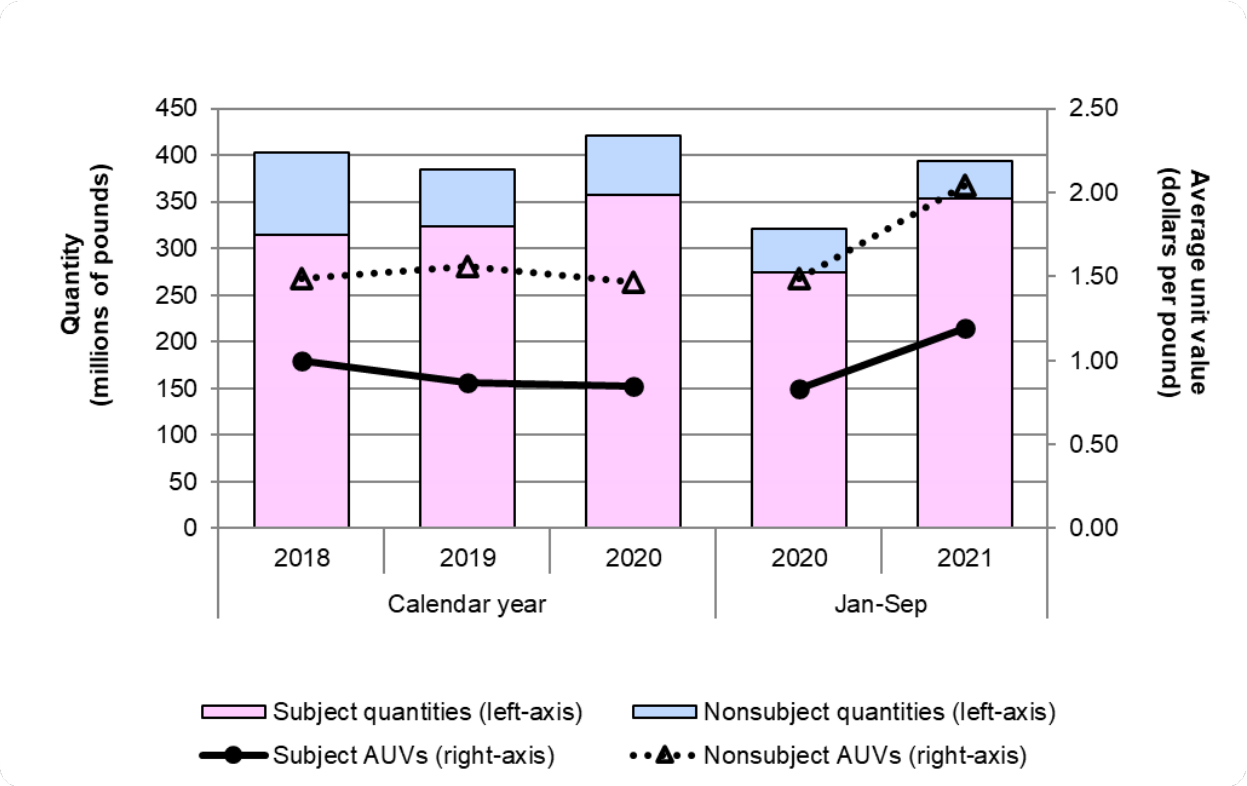
Table IV-4
Raw honey: U.S. re-exports, by period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Re-exports	Quantity	5,838	7,137	6,154	4,686	5,191
Re-exports	Value	7,168	8,880	7,218	5,467	6,542
Re-exports	Unit value	1.23	1.24	1.17	1.17	1.26

Source: Compiled from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. exports statistics are based on foreign-origin exports (also known as re-exports).

Figure IV-1
Raw honey: U.S. import quantities and average unit values, by source and period



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[5] 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.[6] Imports from Argentina, Brazil, India, and Vietnam accounted for 84.8 percent of total imports of raw honey by quantity during April 2020 through March 2021, with country-specific shares ranging from 19.2 percent (Brazil and India) to 26.1 percent (Vietnam).

Table IV-5
Raw honey: U.S. imports in the twelve-month period preceding the filing of the petition, April 2020 through March 2021

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
Argentina	89,037	20.3
Brazil	84,326	19.2
India	84,225	19.2
Vietnam	114,560	26.1
All other sources	66,402	15.1
All import sources	438,549	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

[5] 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)).

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

Critical circumstances

On April 14, 2022, Commerce issued its final determination that "critical circumstances" exist with regard to imports from Argentina of raw honey from ACA Coop, Haedo, CIPSA, and other producers/exporters except NEXCO. Commerce also determined that "critical circumstances" exist with regard to imports from Vietnam of raw honey from Ban Me Thuot Honeybee, Honeybee Daklak, and other producers/exporters.[7] [8] In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from November 23, 2021, the effective date of Commerce's preliminary affirmative LTFV determination. Tables IV-6 through IV-9 and figures IV-2 through IV-3 present data concerning imports and inventories subject to Commerce's final affirmative critical circumstances determinations.

[7] 87 FR 22179, 87 FR 22184, April 14, 2022.

[8] On November 23, 2021, Commerce issued its preliminary determination that "critical circumstances" exist with regard to imports from Argentina of raw honey from ACA Coop, Haedo, CIPSA, and other producers/exporters except NEXCO. On January 13, 2022, Commerce issued its preliminary determination that "critical circumstances" exist with regard to imports from Vietnam of raw honey from Ban Me Thuot Honeybee, Honeybee Daklak, and other producers/exporters. 86 FR 66531, November 23, 2021; 87 FR 2127, January 13, 2022, 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 IV-6
U.S. imports from Argentina subject to Commerce's affirmative final critical circumstances determination, by period

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
November 2020	Before	***
December 2020	Before	***
January 2021	Before	***
February 2021	Before	***
March 2021	Before	***
April 2021	Before	***
May 2021	After	***
June 2021	After	***
July 2021	After	***
August 2021	After	***
September 2021	After	***
October 2021	After	***

Table continued.

Table IV-6 Continued
Raw honey: U.S. imports from Argentina subject to Commerce's affirmative final critical circumstances determination, by period

Quantity in 1,000 pounds

Comparison pre- and post-petition periods	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from data submitted in response to Commission questionnaires. U.S. import statistics are based on imports for consumption.

Figure IV-2
Raw honey: U.S. imports from Argentina subject to Commerce's final critical circumstances determination, by period

* * * * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from data submitted in response to Commission questionnaires. U.S. import statistics are based on imports for consumption.

Table IV-7
Raw honey: U.S. importers' U.S. inventories of subject imports from Argentina subject to Commerce's final affirmative critical circumstances determination, by date

Quantity in 1,000 pounds; index in percent

Date	Quantity	Index
April 30, 2021	***	***
May 31, 2021	***	***
June 30, 2021	***	***
July 31, 2021	***	***
August 31, 2021	***	***
September 30, 2021	***	***
October 31, 2021	***	***

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

Note: Index based on end of period inventories on April 30, 2021, equal to 100.0 percent.

Table IV-8
Raw honey: U.S. imports from Vietnam subject to Commerce's affirmative final critical circumstances determination, by period

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
November 2020	Before	9,887
December 2020	Before	10,932
January 2021	Before	9,308
February 2021	Before	7,480
March 2021	Before	6,430
April 2021	Before	3,949
May 2021	After	6,053
June 2021	After	7,460
July 2021	After	13,773
August 2021	After	27,136
September 2021	After	17,886
October 2021	After	15,619

Table continued.

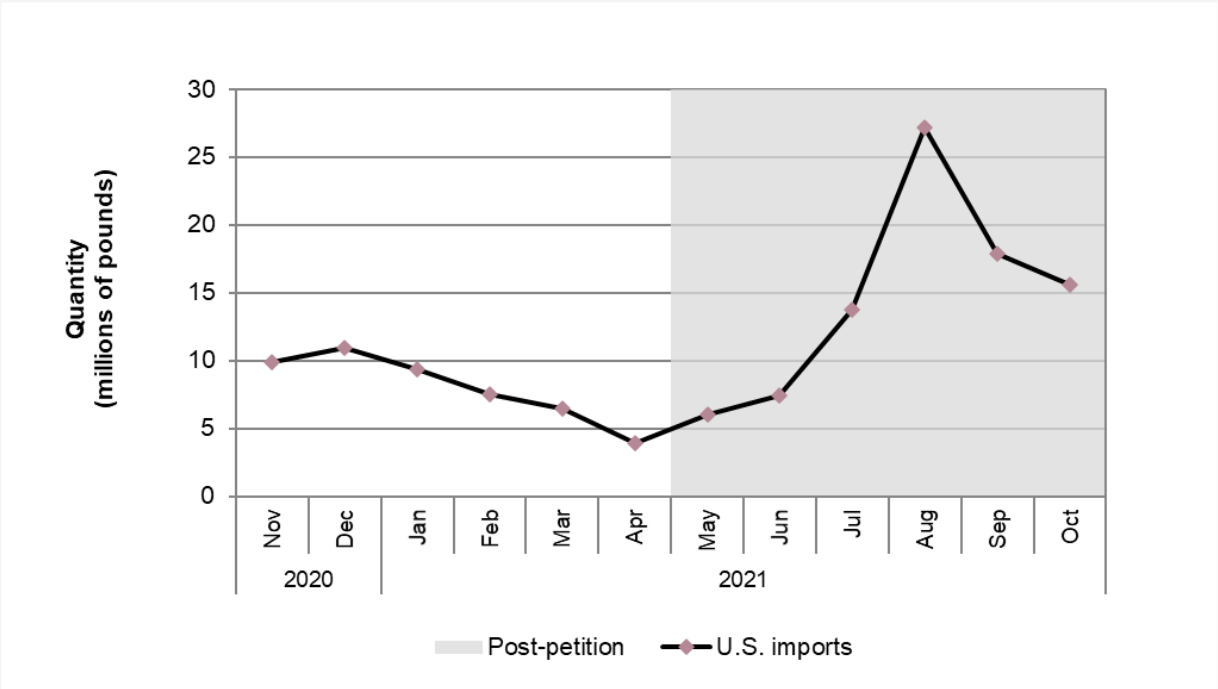
Table IV-8 Continued
Raw honey: U.S. imports from Vietnam subject to Commerce's affirmative final critical circumstances determination, by period

Quantity in 1,000 pounds

Comparison pre- and post- petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	3,949	6,053	53.3
2 months	10,379	13,513	30.2
3 months	17,859	27,285	52.8
4 months	27,167	54,422	100.3
5 months	38,099	72,308	89.8
6 months	47,986	87,926	83.2

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Figure IV-3
Raw honey: U.S. imports from Vietnam subject to Commerce's final critical circumstances determination, by period



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Table IV-9
Raw honey: U.S. importers' U.S. inventories of subject imports from Vietnam subject to Commerce's final affirmative critical circumstances determination, by date

Quantity in 1,000 pounds; index in percent

Date	Quantity	Index
April 30, 2021	***	***
May 31, 2021	***	***
June 30, 2021	***	***
July 31, 2021	***	***
August 31, 2021	***	***
September 30, 2021	***	***
October 31, 2021	***	***

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

Note: Index based on end of period inventories on April 30, 2021, equal to 100.0 percent.

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 II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table IV-10 and figure IV-4 present data for U.S. shipments of raw honey by source and color in 2020.[9] In 2020, U.S. producers reported U.S. shipments of raw honey in all four colors. The largest share of U.S. producers' U.S. shipments was in white or lighter, 20.9 million pounds (56.6 percent), while the smallest share of U.S. producers' U.S. shipments was for amber or darker honey, 790,000 pounds (2.1 percent). U.S. importers reported U.S. shipments in all four colors for imports of raw honey from Argentina, Brazil, and India but reported no U.S. shipments of white or lighter raw honey for imports from Vietnam. U.S. imports from Vietnam accounted for the large majority of U.S. shipments of amber or darker raw honey (*** percent). U.S. importers' U.S. shipments from subject sources made up at least *** percent of U.S. shipments for light amber and amber or darker, *** percent of U.S. shipments for extra light amber, and *** percent of U.S. shipments for white or lighter raw honey.

[9] Data for U.S. shipments by source, color and time period are presented in Appendix E.

Table IV-10
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2020

Quantity in 1,000 pounds

Source	White or lighter	Extra light amber	Light amber	Amber or darker	All colors
U.S. producers	20,926	8,604	6,671	790	36,992
Argentina	***	***	***	***	***
Brazil	***	***	***	***	***
India	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table IV-10 Continued
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2020

Share across in percent

Source	White or lighter	Extra light amber	Light amber	Amber or darker	All colors
U.S. producers	56.6	23.3	18.0	2.1	100.0
Argentina	***	***	***	***	100.0
Brazil	***	***	***	***	100.0
India	***	***	***	***	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 IV-10 Continued
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2020

Share down in percent

Source	White or lighter	Extra light amber	Light amber	Amber or darker	All colors
U.S. producers	***	***	***	***	***
Argentina	***	***	***	***	***
Brazil	***	***	***	***	***
India	***	***	***	***	***
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.

Figure IV-4
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2020

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Table IV-11 and figure IV-5 present data for U.S. shipments of raw honey by source and product type in 2020.[10] U.S. imports from subject sources accounted for 90.3 percent of U.S. shipments of organic honey and 75.2 percent of U.S. shipments of conventional honey. U.S. imports from Brazil accounted for the large majority (81.8 percent) of U.S. shipments of organic honey while imports from Vietnam, Argentina, and India accounted for the largest shares of U.S. shipments of conventional honey (29.3 percent, 22.2 percent, and 21.2 percent, respectively). U.S. producers reported no U.S. shipments of organic honey in 2020.

Table IV-11
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2020

Quantity in 1,000 pounds

Source	Organic	Conventional	All product types
U.S. producers	---	36,992	36,992
Argentina	3,687	83,887	87,574
Brazil	65,844	9,528	75,371
India	2,653	79,964	82,617
Vietnam	502	110,854	111,356
Subject sources	72,686	284,233	356,918
Nonsubject sources	7,775	56,752	64,528
All import sources	80,461	340,985	421,446
All sources	80,461	377,977	458,438

Table continued.

Table IV-11 Continued
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2020

Share across in percent

Source	Organic	Conventional	All product types
U.S. producers	---	100.0	100.0
Argentina	4.2	95.8	100.0
Brazil	87.4	12.6	100.0
India	3.2	96.8	100.0
Vietnam	0.5	99.5	100.0
Subject sources	20.4	79.6	100.0
Nonsubject sources	12.0	88.0	100.0
All import sources	19.1	80.9	100.0
All sources	17.6	82.4	100.0

Table continued.

[10] Data for U.S. shipments by source, product type, and time period are presented in Appendix F.

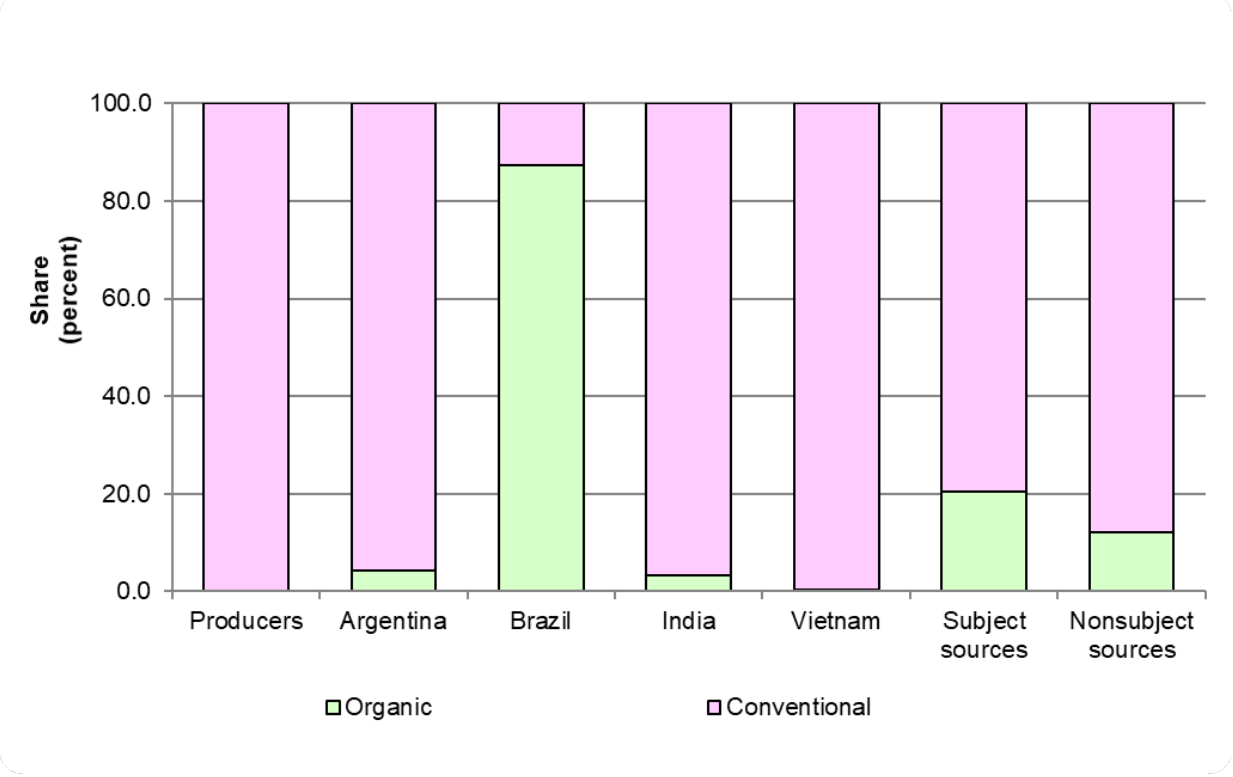
Table IV-11 Continued
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2020

Share down in percent

Source	Organic	Conventional	All product types
U.S. producers	---	9.8	8.1
Argentina	4.6	22.2	19.1
Brazil	81.8	2.5	16.4
India	3.3	21.2	18.0
Vietnam	0.6	29.3	24.3
Subject sources	90.3	75.2	77.9
Nonsubject sources	9.7	15.0	14.1
All import sources	100.0	90.2	91.9
All sources	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Figure IV-5
Raw honey: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2020



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Geographical markets

U.S. imports from each subject source entered through all four border entries in 2020. The most common border of entry for imports from each subject source was through the East. The least common border of entry for imports from Argentina and Brazil was through the North while the least common border of entry for imports from India and Vietnam were through the South and West, respectively.

Table IV-12
Raw honey: U.S. imports by source and border of entry, 2020

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
Argentina	55,887	778	29,471	1,438	87,574
Brazil	38,582	3,030	30,402	3,358	75,371
India	36,007	28,105	6,735	11,770	82,617
Vietnam	34,403	26,343	26,030	24,579	111,356
Subject sources	164,879	58,255	92,639	41,145	356,918
Canada	656	8,005	---	75	8,735
Ukraine	8,818	2,320	8,991	4,031	24,161
All other sources	11,947	891	15,239	3,554	31,631
Nonsubject sources	21,421	11,216	24,230	7,660	64,528
All import sources	186,301	69,471	116,869	48,805	421,446

Table continued.

Table IV-12 Continued
Raw honey: U.S. imports by source and border of entry, 2020

Share across in percent

Source	East	North	South	West	All borders
Argentina	63.8	0.9	33.7	1.6	100.0
Brazil	51.2	4.0	40.3	4.5	100.0
India	43.6	34.0	8.2	14.2	100.0
Vietnam	30.9	23.7	23.4	22.1	100.0
Subject sources	46.2	16.3	26.0	11.5	100.0
Canada	7.5	91.6	---	0.9	100.0
Ukraine	36.5	9.6	37.2	16.7	100.0
All other sources	37.8	2.8	48.2	11.2	100.0
Nonsubject sources	33.2	17.4	37.6	11.9	100.0
All import sources	44.2	16.5	27.7	11.6	100.0

Table continued.

Table IV-12 Continued
Raw honey: U.S. imports by source and border of entry, 2020

Share down in percent

Source	East	North	South	West	All borders
Argentina	30.0	1.1	25.2	2.9	20.8
Brazil	20.7	4.4	26.0	6.9	17.9
India	19.3	40.5	5.8	24.1	19.6
Vietnam	18.5	37.9	22.3	50.4	26.4
Subject sources	88.5	83.9	79.3	84.3	84.7
Canada	0.4	11.5	---	0.2	2.1
Ukraine	4.7	3.3	7.7	8.3	5.7
All other sources	6.4	1.3	13.0	7.3	7.5
Nonsubject sources	11.5	16.1	20.7	15.7	15.3
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

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

Presence in the market

Table IV-13, figure IV-6, and figure IV-7 present data on the monthly entries of U.S. imports of raw honey by source during January 2018 through December 2021. Imports from all subject sources were present in every month during January 2018 through December 2021.

Table IV-13
Raw honey: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Argentina	Brazil	India	Vietnam
2018	January	1,894	3,607	2,805	5,389
2018	February	2,163	3,777	2,895	2,908
2018	March	4,211	2,192	5,500	3,202
2018	April	5,351	3,757	11,599	3,607
2018	May	10,963	5,864	15,516	4,987
2018	June	4,614	2,823	11,686	6,078
2018	July	9,938	4,611	9,462	7,850
2018	August	6,296	6,453	8,478	10,157
2018	September	4,774	5,809	5,926	9,001
2018	October	16,373	4,105	6,611	12,417
2018	November	9,098	4,635	6,787	12,859
2018	December	4,165	4,376	8,949	7,870
2019	January	5,553	4,271	7,021	7,919
2019	February	3,227	3,325	3,844	5,300
2019	March	4,667	3,349	7,983	3,705
2019	April	9,290	3,088	13,545	4,033
2019	May	8,143	3,424	15,729	4,251
2019	June	7,866	3,548	8,028	5,711
2019	July	6,526	6,266	8,087	8,667
2019	August	5,635	5,203	9,764	9,510
2019	September	6,975	5,885	8,370	6,573
2019	October	7,588	4,482	8,739	9,823
2019	November	8,216	5,692	10,179	6,537
2019	December	6,696	4,160	8,023	9,497

Table continued.

Table IV-13 Continued
Raw honey: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Argentina	Brazil	India	Vietnam
2020	January	6,756	5,078	8,191	10,367
2020	February	4,254	3,268	7,048	5,929
2020	March	7,055	6,545	5,511	3,719
2020	April	8,153	6,347	6,063	8,834
2020	May	10,943	6,918	6,023	11,765
2020	June	8,114	6,396	6,391	9,610
2020	July	7,909	8,039	5,610	8,392
2020	August	8,335	7,822	7,211	11,718
2020	September	6,621	8,657	13,518	10,730
2020	October	7,741	5,708	5,338	9,475
2020	November	5,912	5,187	4,728	9,887
2020	December	5,781	5,409	6,985	10,932
2021	January	4,546	5,977	6,183	9,308
2021	February	6,490	8,950	4,346	7,480
2021	March	8,491	8,917	11,829	6,430
2021	April	8,852	8,880	6,364	3,949
2021	May	11,608	7,619	15,101	6,053
2021	June	10,649	12,193	13,238	7,460
2021	July	10,357	6,190	18,664	13,773
2021	August	9,065	5,133	19,421	27,136
2021	September	8,644	4,984	11,757	17,886
2021	October	11,295	5,154	11,463	15,619
2021	November	3,060	1,687	3,162	5,172
2021	December	1,279	468	2,394	2,958

Table continued.

Table IV-13 Continued
Raw honey: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Subject sources	Canada	Ukraine	All other sources	Nonsubject sources	All import sources
2018	January	13,695	2,049	1,959	3,822	7,830	21,525
2018	February	11,743	2,602	843	2,593	6,038	17,781
2018	March	15,105	4,220	167	2,903	7,290	22,395
2018	April	24,313	3,137	875	2,484	6,496	30,809
2018	May	37,330	2,939	541	3,734	7,214	44,544
2018	June	25,201	2,219	541	4,634	7,394	32,595
2018	July	31,861	2,837	888	2,560	6,285	38,146
2018	August	31,384	3,163	547	2,607	6,317	37,701
2018	September	25,510	1,876	1,422	2,600	5,899	31,409
2018	October	39,506	4,272	4,229	2,762	11,264	50,769
2018	November	33,379	2,923	2,658	2,946	8,527	41,906
2018	December	25,360	978	3,498	3,031	7,508	32,868
2019	January	24,764	1,346	3,747	1,942	7,034	31,798
2019	February	15,697	2,064	2,653	1,884	6,602	22,299
2019	March	19,704	2,185	1,180	1,649	5,013	24,717
2019	April	29,956	1,898	2,928	2,344	7,170	37,126
2019	May	31,546	1,080	2,128	2,524	5,732	37,278
2019	June	25,154	1,279	1,050	3,066	5,394	30,548
2019	July	29,546	939	1,010	2,359	4,307	33,853
2019	August	30,113	1,865	928	2,279	5,072	35,184
2019	September	27,803	1,025	773	1,483	3,281	31,084
2019	October	30,632	1,051	1,601	2,096	4,748	35,380
2019	November	30,624	924	463	1,750	3,137	33,762
2019	December	28,375	1,357	591	1,757	3,705	32,081

Table continued.

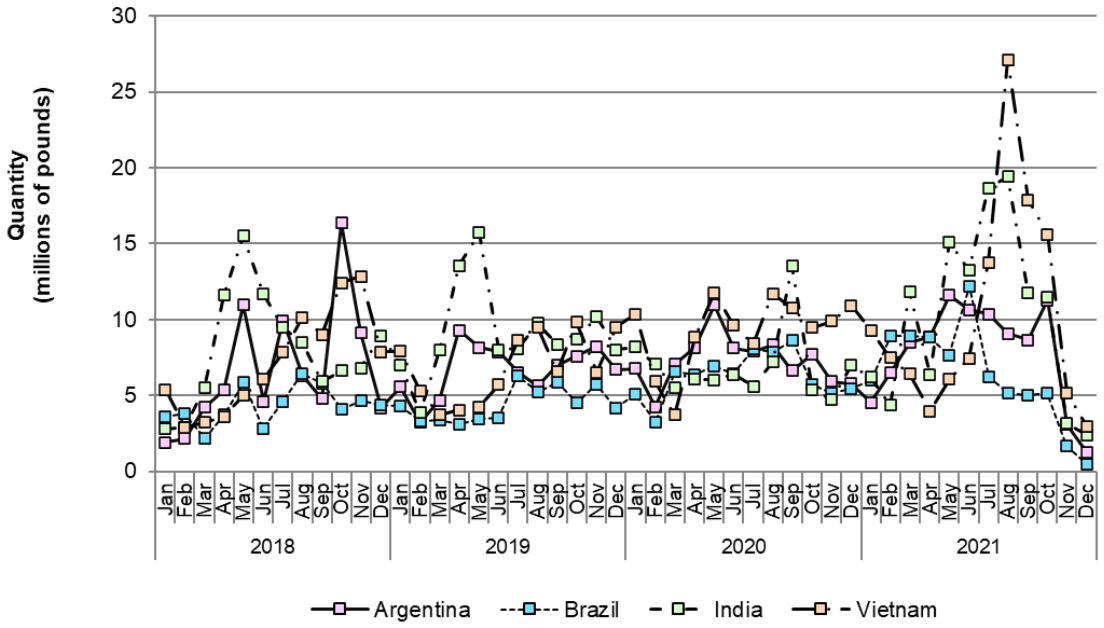
Table IV-13 Continued
Raw honey: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Subject sources	Canada	Ukraine	All other sources	Nonsubject sources	All import sources
2020	January	30,392	519	684	2,289	3,493	33,885
2020	February	20,498	826	2,477	1,668	4,971	25,470
2020	March	22,829	991	1,097	2,483	4,572	27,400
2020	April	29,396	435	2,940	2,379	5,754	35,149
2020	May	35,649	506	3,169	2,630	6,304	41,953
2020	June	30,512	369	3,612	2,565	6,546	37,057
2020	July	29,950	82	1,752	3,609	5,443	35,394
2020	August	35,085	1,788	749	3,342	5,878	40,963
2020	September	39,526	1,375	173	2,964	4,512	44,038
2020	October	28,262	936	1,136	2,721	4,794	33,056
2020	November	25,714	465	1,388	3,136	4,990	30,703
2020	December	29,107	443	4,984	1,845	7,272	36,378
2021	January	26,014	326	2,479	2,325	5,130	31,144
2021	February	27,266	391	2,057	1,954	4,402	31,668
2021	March	35,668	172	2,536	2,670	5,378	41,046
2021	April	28,045	120	1,123	2,136	3,379	31,424
2021	May	40,381	421	1,759	1,665	3,845	44,226
2021	June	43,541	89	945	4,174	5,209	48,749
2021	July	48,984	543	932	3,057	4,532	53,516
2021	August	60,756	928	841	2,941	4,710	65,466
2021	September	43,271	993	210	2,334	3,537	46,807
2021	October	43,531	300	10	3,995	4,305	47,837
2021	November	13,082	1,559	---	4,201	5,760	18,842
2021	December	7,098	389	131	4,738	5,257	12,356

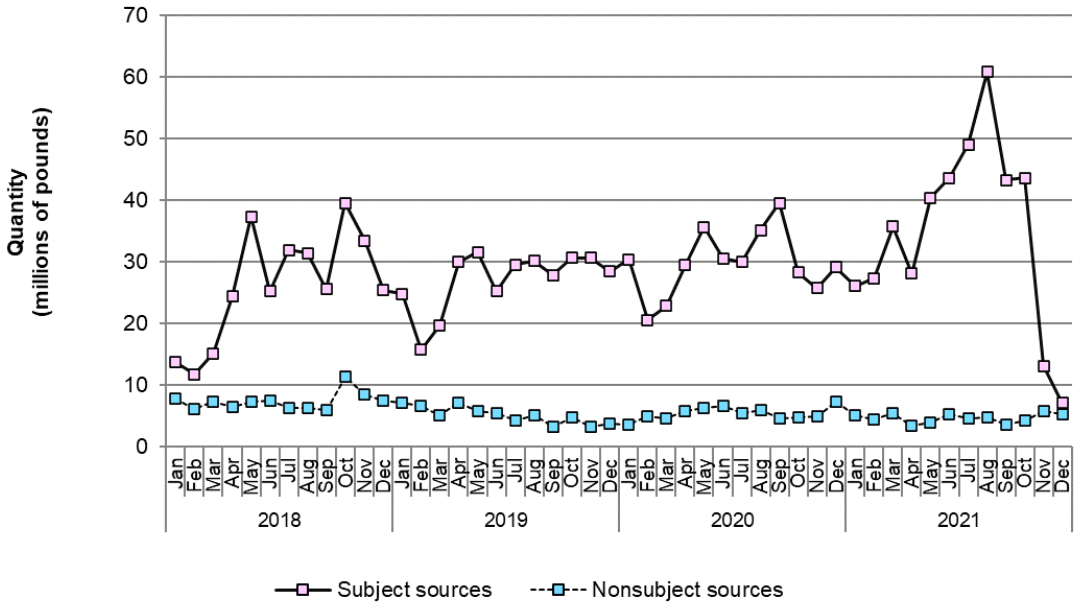
Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Figure IV-6
Raw honey: U.S. imports from individual subject sources, by source and by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Figure IV-7
Raw honey: U.S. imports from aggregated subject source and nonsubject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption.

Apparent U.S. consumption

Based on quantity

Table IV-14 and figure IV-8 present data on apparent U.S. consumption and U.S. market shares for raw honey by quantity.[11] During 2018-19, apparent consumption by quantity decreased by 3.0 percent before increasing by 4.9 percent during 2019-20 (a net increase of 1.8 percent during 2018-20) and was 15.2 percent higher during January-September 2021 compared to January-September 2020. Subject source imports' combined market share by quantity increased by 6.2 percentage points during 2018-20 and was 8.4 percentage points higher during January-September 2021 compared to January-September 2020. U.S. producers' market share by quantity increased by 1.3 percentage points during 2018-19, then decreased by 3.4 percentage points during 2019-20, and was 5.3 percentage points lower during January-September 2021 compared to January-September 2020. The market share of imports by quantity for each subject source except India increased during 2018-20, while the market share of imports from Canada, the largest nonsubject source at the beginning of the period of investigation, decreased from 5.9 percent to 1.5 percent during the same time period. Nonsubject imports declined from 15.6 percent in 2018 to 11.4 percent in 2020.

[11] Appendix G presents data on apparent U.S. consumption and U.S. market shares including full year 2021.

Table IV-14
Raw honey: Apparent U.S. consumption and market shares based on quantity, by source and period

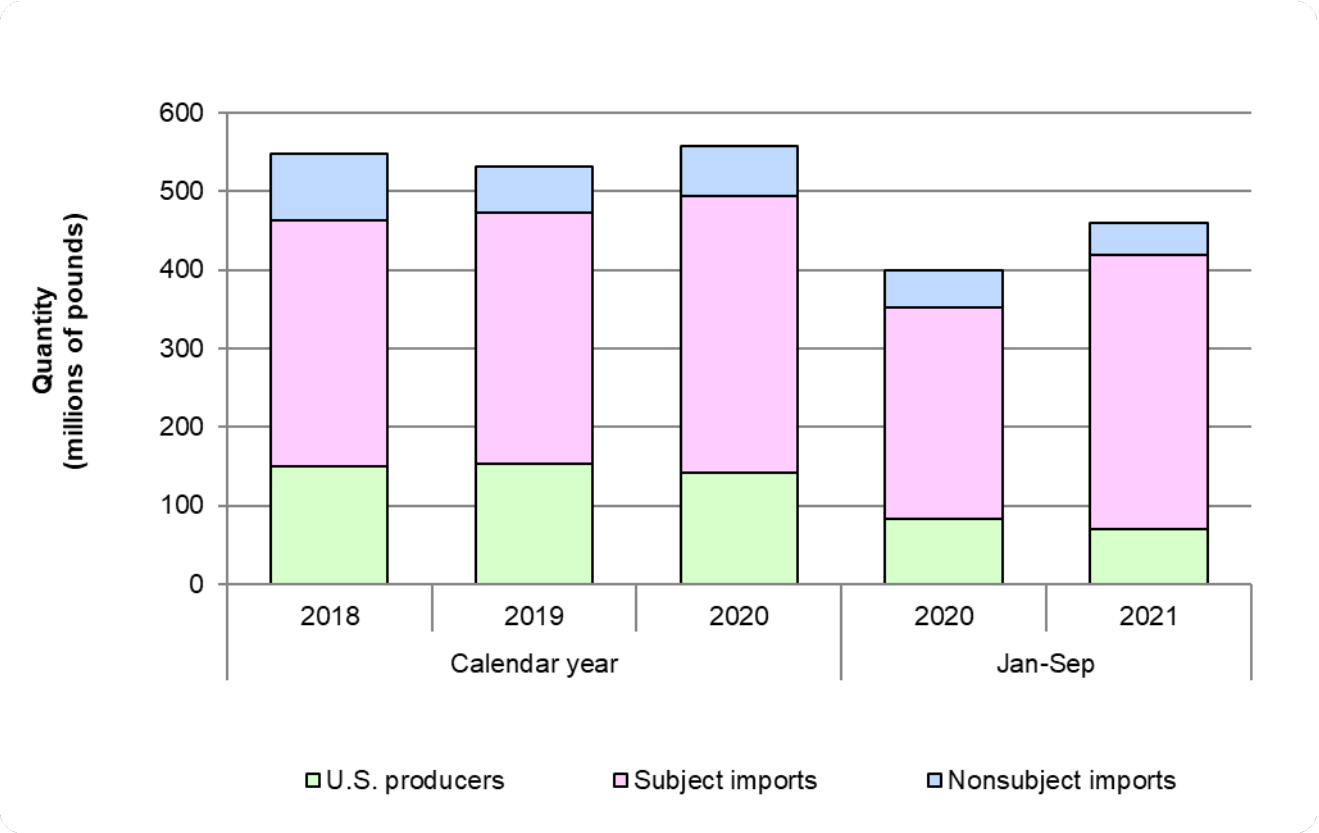
Quantity in 1,000 pounds; shares in percent

Source	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
U.S. producers	Quantity	150,778	153,222	141,694	82,357	70,732
Argentina	Quantity	79,839	78,083	84,935	65,788	78,703
Brazil	Quantity	52,009	52,693	75,371	59,068	64,776
India	Quantity	96,215	106,910	79,997	63,231	105,902
Vietnam	Quantity	83,335	81,526	111,356	81,063	99,475
Subject sources	Quantity	311,397	319,212	351,660	269,150	348,856
Canada	Quantity	32,142	16,333	8,614	6,891	3,971
Ukraine	Quantity	18,168	19,051	24,161	16,652	12,883
All other sources	Quantity	34,902	23,375	30,857	23,929	23,146
Nonsubject sources	Quantity	85,212	58,760	63,633	47,473	40,000
All import sources	Quantity	396,609	377,972	415,292	316,622	388,856
All sources	Quantity	547,387	531,194	556,986	398,979	459,587
U.S. producers	Share	27.5	28.8	25.4	20.6	15.4
Argentina	Share	14.6	14.7	15.2	16.5	17.1
Brazil	Share	9.5	9.9	13.5	14.8	14.1
India	Share	17.6	20.1	14.4	15.8	23.0
Vietnam	Share	15.2	15.3	20.0	20.3	21.6
Subject sources	Share	56.9	60.1	63.1	67.5	75.9
Canada	Share	5.9	3.1	1.5	1.7	0.9
Ukraine	Share	3.3	3.6	4.3	4.2	2.8
All other sources	Share	6.4	4.4	5.5	6.0	5.0
Nonsubject sources	Share	15.6	11.1	11.4	11.9	8.7
All import sources	Share	72.5	71.2	74.6	79.4	84.6
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted export shipments by source as reported in U.S. importer questionnaire responses. Domestic exports (not shown separately in the table) are netted out of the NASS data used for U.S. producers.

Note: Partial year period U.S. shipments are derived using the full year NASS data for 2020 and 2021 adjusted down for the partial year period using the share of annual U.S. producer shipments reported between January to September in questionnaire responses to the preliminary phase investigations.

Figure IV-7
Raw honey: Apparent U.S. consumption based on quantity, by source and period



Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted export shipments by source as reported in U.S. importer questionnaire responses. Domestic exports are netted out of the NASS data used for U.S. producers.

Note: Partial year period U.S. shipments are derived using the full year NASS data for 2020 and 2021 adjusted down for the partial year period using the share of annual U.S. producer shipments reported between January to September in questionnaire responses to the preliminary phase investigations.

Based on value

Table IV-15 and figure IV-9 present data on apparent U.S. consumption and U.S. market shares by value.[12] During 2018-19, apparent consumption by value decreased by 12.7 percent before increasing by 2.3 percent during 2019-20 (a net decrease of 10.7 percent during 2018-20) but was 45.3 percentage points higher during January-September 2021 compared to January-September 2020. Subject source imports combined market share by value increased by 2.6 percentage points during 2018-20 and was 13.7 percentage points higher during January-September 2021 compared to January-September 2020. U.S. producers' market share by value increased by 2.2 percentage points during 2018-19, then decreased by 1.8 percentage points during 2019-20, and was 10.7 percentage points lower during January-September 2021 compared to January-September 2020. The market share of imports by value from Argentina and Vietnam increased during 2018-20 by 2.1 percentage points and 2.4 percentage points, respectively. The market share of imports by value from Brazil decreased by 2.0 percentage points during 2018-19 before increasing by 2.0 percentage points during 2019-20, while the market share of imports by value from India increased by 2.0 percentage points during 2018-19 before decreasing by 3.8 percentage points during 2019-20. Nonsubject imports declined from 16.4 percent in 2018 to 13.5 percent in 2020.

[12] Appendix G presents data on apparent U.S. consumption and U.S. market shares including full year 2021.

Table IV-15
Raw honey: Apparent U.S. consumption and market shares based on value, by source and period

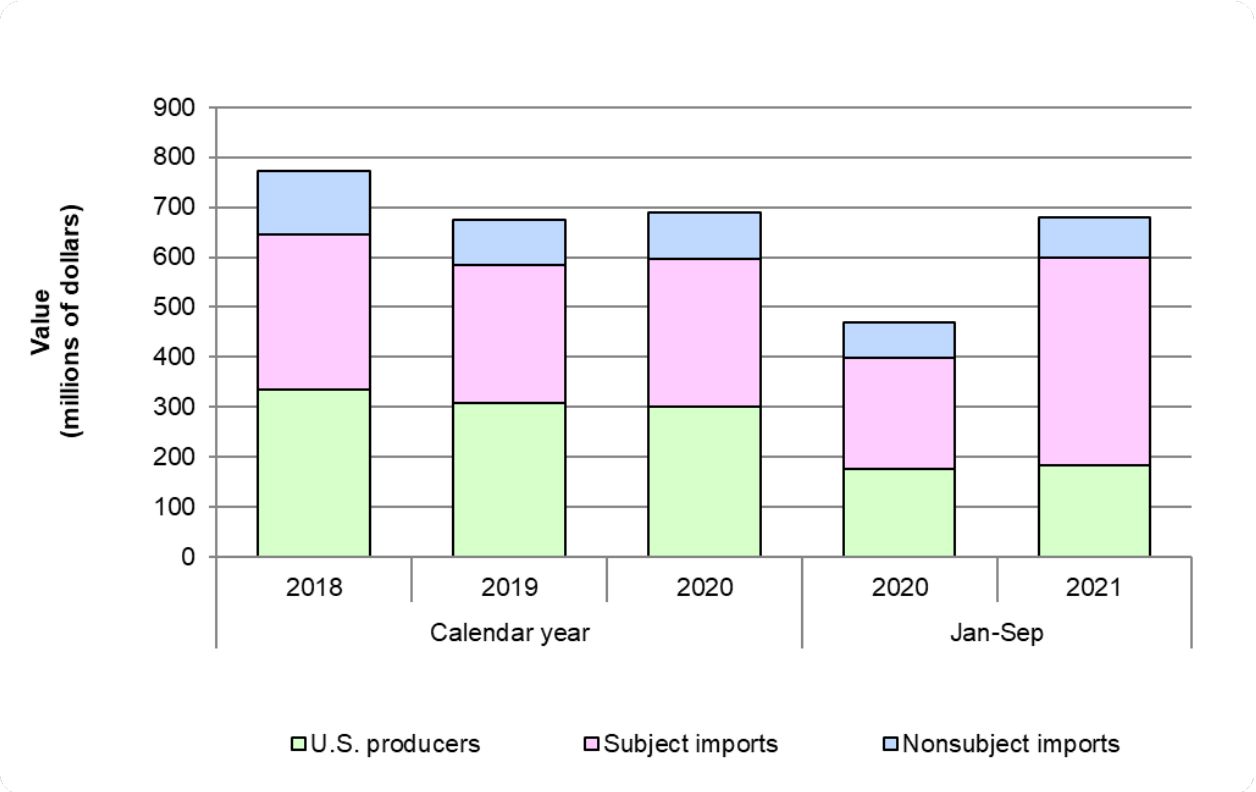
Value in 1,000 dollars; shares in percent

Source	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
U.S. producers	Value	335,134	307,192	301,592	175,295	182,237
Argentina	Value	89,457	81,194	94,106	70,852	127,592
Brazil	Value	81,982	58,128	73,220	54,657	103,908
India	Value	81,011	84,015	59,877	47,129	104,878
Vietnam	Value	58,289	52,830	68,358	49,519	79,950
Subject sources	Value	310,738	276,168	295,562	222,157	416,328
Canada	Value	45,656	23,275	12,873	10,018	7,345
Ukraine	Value	17,067	17,381	20,139	13,799	13,296
All other sources	Value	64,403	50,456	59,925	46,967	61,172
Nonsubject sources	Value	127,125	91,112	92,938	70,784	81,814
All import sources	Value	437,863	367,279	388,500	292,941	498,141
All sources	Value	772,997	674,471	690,092	468,236	680,379
U.S. producers	Share	43.4	45.5	43.7	37.4	26.8
Argentina	Share	11.6	12.0	13.6	15.1	18.8
Brazil	Share	10.6	8.6	10.6	11.7	15.3
India	Share	10.5	12.5	8.7	10.1	15.4
Vietnam	Share	7.5	7.8	9.9	10.6	11.8
Subject sources	Share	40.2	40.9	42.8	47.4	61.2
Canada	Share	5.9	3.5	1.9	2.1	1.1
Ukraine	Share	2.2	2.6	2.9	2.9	2.0
All other sources	Share	8.3	7.5	8.7	10.0	9.0
Nonsubject sources	Share	16.4	13.5	13.5	15.1	12.0
All import sources	Share	56.6	54.5	56.3	62.6	73.2
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted export shipments by source as reported in U.S. importer questionnaire responses. Domestic exports (not shown separately in the table) are netted out of the NASS data used for U.S. producers.

Note: Partial year period U.S. shipments are derived using the full year NASS data for 2020 and 2021 adjusted down for the partial year period using the share of annual U.S. producer shipments reported between January to September in questionnaire responses to the preliminary phase investigations.

Figure IV-8
Raw honey: Apparent U.S. consumption based on value, by source and period



Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted export shipments by source as reported in U.S. importer questionnaire responses. Domestic exports are netted out of the NASS data used for U.S. producers.

Note: Partial year period U.S. shipments are derived using the full year NASS data for 2020 and 2021 adjusted down for the partial year period using the share of annual U.S. producer shipments reported between January to September in questionnaire responses to the preliminary phase investigations.

Part V: Pricing data

Factors affecting prices

Raw material costs

The primary components of raw honey are fructose, glucose, and water, produced by honeybees.[1] To collect raw honey, beekeepers use stacked wooden "bee" boxes that contain bee colonies' hives. Beekeepers then extract the raw honey from the boxes, with larger operations using a honey "extractor." Extracted raw honey is sealed in 55-gallon drums for shipment.[2] [3]

Most firms (26 of 39 responding U.S. producers and 17 of 23 importers)[4] reported that raw material prices increased since January 1, 2018. U.S. producers identified rising costs for lumber, bee feed and sugar, fuel, and inflation as the main factors contributing to increasing raw material prices. Importers reported that climate, freight costs, the cost of drums and lumber, and the COVID-19 pandemic had all impacted raw material prices. Petitioner also noted that fuel costs have recently become more expensive in the transportation of hives to different sites[5] and also noted increased lumber costs for boxes and increased labor costs.[6]

Seven of the 21 responding purchasers reported that they were familiar with raw material costs and seven also reported that information on raw material prices affected their negotiations or contracts to purchase raw honey since 2018. Purchaser *** reported that its negotiations involve a "bid ask" process where both buyers and sellers "do not have a significant pricing influence" and purchaser *** reported that brokers, exporters, and U.S. honey producers have told them that raw material costs are "ever increasing."

[1] Petition, p. 10.

[2] Petition, p. 12.

[3] Ingredient end users that submitted purchaser questionnaires reported purchasing raw honey in ***.

[4] The Commission received 84 U.S. producer questionnaire responses (47 from "large" U.S. producers with more than 3,800 beehives) and 25 importer questionnaires, but not all firms responded to all questions. Only large U.S. producers were asked to complete the full questionnaire. For more information, please see Part I.

[5] Hearing transcript, pp. 154-55 (Spears).

[6] Hearing transcript, p. 156 (Halbgewachs).

Transportation costs to the U.S. market

Transportation costs for raw honey shipped from the subject countries to the United States averaged 6.5 percent of customs value during 2020 and averaged 4.0 percent for all nonsubject import sources. Transportation costs ranged from 3.7 percent for imports from Argentina to 11.9 percent for imports from Vietnam. These estimates were derived from official import data and represent the transportation and other charges on imports.[7]

U.S. inland transportation costs

Most responding U.S. producers (33 of 37 firms) reported that their purchasers typically arrange transportation, while most importers (11 of 17 firms)[8] reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 1.0 percent of the total cost of raw honey to 20.0 percent, while importers reported costs of 1.5 percent to 15.0 percent.

Pricing practices

Pricing methods

U.S. producers reported setting prices using primarily transaction-by-transaction negotiations and other methods, such as honey cooperatives ("co-ops"), while importers reported setting prices primarily through contracts and transaction-by-transaction negotiations (table V-1). Of the U.S. producers that reported setting prices by other methods, firms reported selling to the Sioux Honey Association ("SHA") or to other large honey packers that typically set the price. In particular, SHA members provide virtually all of their honey to the co-op. The co-op then pays an initial advance on delivery, followed by several installments throughout the year, with a final payment at the end of the summer.[9] U.S. producer *** reported that payments from the co-op are spread throughout the entire crop year based on an advance schedule, including an initial payment in December, followed by payments in February, April, June, and August. U.S. producer *** added that it takes about one year for a member to receive its total payment because most honey is delivered in late summer or early fall.

[7] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2020 and then dividing by the customs value based on the HTS statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065. Accessed February 24, 2022.

[8] Importer *** reported that both it and its purchasers may arrange transportation.

[9] Conference transcript, pp. 24-25 (Coy) and p. 101 (Mammen).

Petitioner stated that SHA members often do not know the price that they will receive for their honey until the end of the year.[10]

Table V-1
Raw honey: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. importers
Transaction-by-transaction	20	11
Contract	8	15
Set price list	6	1
Other	19	2
Responding firms	43	20

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.

Note: This includes responses of importers that also imported from Ukraine.

U.S. producers reported selling mostly under annual or short-term contracts.[11] Importers reported selling the vast majority of their raw honey under short-term contracts (table V-2). In contrast, purchasers reported that approximately two-thirds of purchases of U.S.-produced raw honey were through short-term contracts, while the vast majority of purchases of raw honey from subject sources was purchases through short-term contracts (table V-3).[12] Several purchasers indicated that they generally purchase domestic raw honey on the spot market because U.S. producers are able to produce only small loads at a time.

[10] Hearing transcript, p. 34 (Spears).

[11] Twelve of the 28 U.S. producers reporting sales through annual or long-term contracts are members of SHA.

[12] Staff calculated these shares by weighting firms' responses with their reported purchases. End user purchasers (***), purchaser *** and *** are not included in these calculations because their purchase price data were either excluded from the analysis (see "Purchase price data from Commission questionnaires" below) or because the firm did not provide purchase price data. Purchasers (***) reported that 100 percent of their purchases from subject sources were purchased through annual contracts. Purchaser *** reported that 100 percent of its purchases of raw honey from subject sources were through short-term contracts, and purchaser *** reported that 50 percent of its purchases of U.S.-produced honey were through short-term contracts and the remaining 50 percent were through long-term contracts.

Table V-2
Raw honey: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2020

Share in percent

Item	U.S. producers	Subject U.S. importers
Long-term contracts	6.4	---
Annual contract	48.8	3.6
Short-term contracts	31.1	90.7
Spot sales	13.7	5.7

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

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

Note: This includes responses of importers that also imported from Ukraine.

Table V-3
Raw honey: U.S. purchasers' shares of purchases by type of sale and source, 2020

Share in percent

Item	Domestic	Argentina	Brazil	India	Vietnam
Long-term contracts	***	***	***	***	***
Annual contract	***	***	***	***	***
Short-term contracts	***	***	***	***	***
Spot sales	***	***	***	***	***

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

Among responding U.S. producers, importers, and purchasers, most firms reported that their short-term contracts do not allow for price renegotiation, that both quantity and price are fixed, and that prices are not indexed to raw materials. Petitioner stated that packers set prices and there is very little room for negotiation.[13] U.S. producer Sweet River Company stated that it receives emails from multiple packers during different honey seasons announcing the price that they are offering, and that these prices vary little between packers.[14]

Three purchasers reported that they purchase raw honey daily, eight purchase weekly, seven purchase monthly, one purchases quarterly, and one purchases annually. Purchaser (***) reported that it makes purchases based on seasonality and availability of offers. Fifteen of 21 purchasers reported that their frequency of purchases had not changed since 2018. Six purchasers reported that it had, with three purchasers reporting that their frequency of purchases had changed due to inconsistent monthly deliveries, supply chain

[13] Hearing transcript, pp. 17, 27 (Hiatt, Blumenthal).
[14] Hearing transcript, p. 117 (Halbgewachs).

challenges, and short U.S. honey crops. Most (13 of 21) purchasers contact between one to five suppliers before making a purchase.

Sales terms and discounts

Most firms offer no discounts, with most responding U.S. producers (30 of 39) and importers (17 of 18) reporting no specific discount policy. U.S. producers and importers were mixed in whether they reported quoting prices on f.o.b. or delivered bases. Some firms reported that they will quote either on an f.o.b. basis or delivered basis, depending on customer needs.

Price leadership

Six of 21 purchasers reported price leaders in the raw honey market, including SHA (3 purchasers), Sunland Trading (2), Odem International, Lamex Foods, Adee Honey Farms, and Impex (1 each). Purchasers reporting SHA explained that SHA is able to lower its pricing to be more competitive because it does not provide a guaranteed price for its members, and that because co-ops bargain collectively on behalf of their members, the prices paid by the co-op are often viewed as the price floor for the raw honey market. Six purchasers reported no price leaders, due to the wide range in quality of honey, a honey market that is "fractured" by geographic location, and the large number of producers in the industry.

Purchase price data from Commission questionnaires

The Commission requested purchasers provide quarterly purchase price data for the total quantity and delivered value of the following raw honey products purchased from unrelated U.S. suppliers since January 1, 2018.

Sixteen purchasers provided usable purchase price data for purchases of the requested products, although not all firms reported pricing for all products for all quarters.[15] [16]

[15] 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.

[16] The purchase price data reported by five U.S. purchasers *** are excluded. Data are excluded for purchaser *** because many other purchasers reported sourcing their purchases from the firm. Purchase price data reported by *** was minimal and accounted for less than *** percent of reported purchases of responding purchasers. Additionally, purchase price data from ingredient and end users *** were excluded because they sourced from packers that had already reported

(*continued*...)

Purchase price data reported by responding firms accounted for approximately 74.9 percent of U.S. producers' U.S. shipments in 2020.[17] Purchase price data accounted for 87.4 percent of importers' U.S. shipments of raw honey from Argentina, 84.4 percent of shipments from Brazil, 55.8 percent from India, and 46.9 percent of raw honey from Vietnam in 2020.[18] Purchase prices for nonsubject Ukraine are shown in Appendix J.

Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-1 to V-4.

Product 1. Raw white honey (0 – 34 mm),[19] packaged in 55-gallon drums.

Product 2. Raw extra light amber honey (35 – 50 mm), packaged in 55-gallon drums.

Product 3. Raw light amber honey (51 – 85 mm), packaged in 55-gallon drums.

Product 4. Raw amber honey (greater than 86 mm), packaged in 55-gallon drums.

purchase price data, reported purchase prices for products that were ***, and were only able to report prices for product sold in bulk containers rather than 55-gallon drums, as specified in the purchase price product definitions (see Appendix H for purchase price data reported by these firms).

[17] Petitioner ***. Petitioner posthearing brief, Exh. 1, p. 48.

[18] Purchase price coverage is calculated by dividing responding U.S. purchasers' purchase price data by U.S. shipments reported by U.S. producers and importers. See Parts III and IV.

[19] Honey colors are measured on the Pfund scale. The Pfund grade is determined by how many millimeters ("mm") that spot deviates from the far left of the chart. "The Color of Honey: No More Bickering," Brendan I Koerner, New York Times, https://www.nytimes.com/2005/07/31/business/yourmoney/the-color-of-honey-no-more-bickering.html, July 31, 2005. Accessed May 27, 2021.

Table V-4
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in 1,000 pounds, margin in percent.

Period	U.S. purchase price	U.S. quantity	Argentina purchase price	Argentina quantity	Argentina margin	Brazil purchase price	Brazil quantity	Brazil margin
2018 Q1	2.06	4,648	1.36	1,561	34.2	***	***	***
2018 Q2	***	***	1.32	7,526	***	1.84	293	***
2018 Q3	2.01	9,296	1.30	4,638	35.6	***	***	***
2018 Q4	1.95	8,867	1.25	5,767	35.9	***	***	***
2019 Q1	1.98	1,245	1.20	1,619	39.4	***	***	***
2019 Q2	***	***	1.21	4,635	***	***	***	***
2019 Q3	1.78	11,904	1.14	4,387	35.9	***	***	***
2019 Q4	1.68	8,578	1.14	7,191	32.2	***	***	***
2020 Q1	1.60	4,450	1.13	4,901	29.7	***	***	***
2020 Q2	***	***	1.18	4,978	***	***	***	***
2020 Q3	1.55	13,635	1.21	4,490	22.1	***	***	***
2020 Q4	1.49	14,589	1.26	3,862	15.4	1.27	507	15.1
2021 Q1	1.70	4,099	1.49	3,706	12.1	***	***	***
2021 Q2	***	***	1.79	7,390	***	***	***	***
2021 Q3	2.29	8,311	1.84	3,723	20.0	***	***	***

Period	U.S. purchase price	U.S. quantity	India purchase price	India quantity	India margin	Subject purchase price	Subject quantity	Subject margin
2018 Q1	2.06	4,648	***	***	***	1.40	***	32.1
2018 Q2	***	***	0.97	4,478	***	1.20	***	***
2018 Q3	2.01	9,296	0.98	1,190	51.3	1.23	***	38.7
2018 Q4	1.95	8,867	0.96	882	50.6	1.21	***	37.9
2019 Q1	1.98	1,245	***	***	***	1.05	***	47.0
2019 Q2	***	***	0.92	6,108	***	1.04	***	***
2019 Q3	1.78	11,904	0.86	5,010	52.1	0.99	***	44.5
2019 Q4	1.68	8,578	0.81	1,624	52.0	1.08	***	35.8
2020 Q1	1.60	4,450	***	***	***	1.07	***	33.1
2020 Q2	***	***	0.86	874	***	1.10	***	***
2020 Q3	1.55	13,635	***	***	***	1.06	***	31.8
2020 Q4	1.49	14,589	***	***	***	1.15	***	23.2
2021 Q1	1.70	4,099	***	***	***	1.38	***	19.0
2021 Q2	***	***	1.04	6,872	***	1.43	***	***
2021 Q3	2.29	8,311	1.16	5,842	49.6	1.43	***	37.7

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

Note: Product 1: Raw white honey (0 – 34 mm), packaged in 55-gallon drums.

Note: There were no reported purchase price data for Vietnam for pricing product 1.

Table V-5
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in 1,000 pounds, margin in percent.

Period	U.S. purchase price	U.S. quantity	Argentina purchase price	Argentina quantity	Argentina margin	Brazil purchase price	Brazil quantity	Brazil margin
2018 Q1	2.16	4,977	1.32	5,315	39.1	***	***	***
2018 Q2	1.86	11,935	1.27	9,678	32.1	***	***	***
2018 Q3	2.05	6,140	1.26	10,115	38.6	***	***	***
2018 Q4	2.01	4,586	1.20	13,537	40.0	1.63	546	18.6
2019 Q1	1.89	1,384	1.21	6,763	36.0	1.44	1,266	23.7
2019 Q2	1.70	10,432	1.19	11,736	29.9	1.30	1,210	23.3
2019 Q3	1.89	5,246	1.14	10,626	39.8	1.18	1,772	37.7
2019 Q4	1.82	2,223	1.13	11,813	38.0	1.23	1,048	32.5
2020 Q1	1.59	1,056	1.13	10,847	29.0	1.04	2,004	34.5
2020 Q2	***	***	1.20	16,025	***	1.02	1,906	***
2020 Q3	***	***	1.24	13,012	***	1.08	1,677	***
2020 Q4	1.52	6,752	1.27	13,583	16.6	1.37	2,014	9.7
2021 Q1	1.78	4,629	1.54	10,387	13.3	1.57	1,851	11.6
2021 Q2	1.68	7,400	1.78	14,507	(6.0)	1.79	2,299	(6.4)
2021 Q3	2.24	5,620	1.87	10,271	16.7	1.90	974	15.4

Period	U.S. purchase price	U.S. quantity	India purchase price	India quantity	India margin	Vietnam purchase price	Vietnam quantity	Vietnam margin
2018 Q1	2.16	4,977	0.96	1,589	55.7	***	***	***
2018 Q2	1.86	11,935	0.93	7,418	50.1	***	***	***
2018 Q3	2.05	6,140	1.02	5,628	50.4	***	***	***
2018 Q4	2.01	4,586	0.91	6,962	54.6	***	***	***
2019 Q1	1.89	1,384	0.91	1,694	51.6	***	***	***
2019 Q2	1.70	10,432	0.89	4,757	47.9	***	***	***
2019 Q3	1.89	5,246	0.84	9,666	55.6	***	***	***
2019 Q4	1.82	2,223	0.82	4,921	54.9	***	***	***
2020 Q1	1.59	1,056	0.80	3,706	49.5	***	***	***
2020 Q2	***	***	0.78	3,842	***	***	***	***
2020 Q3	***	***	0.77	5,601	***	***	***	***
2020 Q4	1.52	6,752	0.79	3,882	48.1	***	***	***
2021 Q1	1.78	4,629	0.91	3,601	48.9	***	***	***
2021 Q2	1.68	7,400	1.08	7,194	35.6	***	***	***
2021 Q3	2.24	5,620	1.17	6,855	47.9	***	***	***

Table continued.

Table V-5 Continued
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Period	U.S. purchase price	U.S. quantity	Subject purchase price	Subject quantity	Subject margin
2018 Q1	2.16	4,977	***	***	***
2018 Q2	1.86	11,935	***	***	***
2018 Q3	2.05	6,140	***	***	***
2018 Q4	2.01	4,586	***	***	***
2019 Q1	1.89	1,384	***	***	***
2019 Q2	1.70	10,432	***	***	***
2019 Q3	1.89	5,246	***	***	***
2019 Q4	1.82	2,223	***	***	***
2020 Q1	1.59	1,056	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	1.52	6,752	***	***	***
2021 Q1	1.78	4,629	***	***	***
2021 Q2	1.68	7,400	***	***	***
2021 Q3	2.24	5,620	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 2: Raw extra light amber honey (35 – 50 mm), packaged in 55-gallon drums.

Table V-6
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in 1,000 pounds, margin in percent.

Period	U.S. purchase price	U.S. quantity	Argentina purchase price	Argentina quantity	Argentina margin	Brazil purchase price	Brazil quantity	Brazil margin
2018 Q1	1.95	988	1.12	1,009	42.8	1.95	3,296	0.4
2018 Q2	***	***	***	***	***	1.77	6,617	***
2018 Q3	1.98	2,288	1.05	1,500	46.9	1.66	11,351	16.3
2018 Q4	1.87	3,339	1.13	3,745	39.5	1.53	8,182	18.4
2019 Q1	1.79	1,406	1.05	1,999	41.4	1.40	9,028	21.7
2019 Q2	***	***	1.07	2,675	***	1.29	6,266	***
2019 Q3	1.85	3,015	1.06	2,664	42.5	1.25	10,722	32.4
2019 Q4	1.80	3,406	1.01	1,646	43.9	1.15	8,997	36.0
2020 Q1	1.54	1,433	1.02	1,587	33.8	0.98	11,371	36.5
2020 Q2	1.30	7,055	1.07	1,744	17.8	0.97	13,782	25.7
2020 Q3	1.70	4,573	***	***	***	0.98	16,279	42.4
2020 Q4	1.68	2,892	1.14	1,914	32.0	1.07	13,146	36.1
2021 Q1	1.79	1,331	1.54	1,867	13.9	1.54	14,403	14.0
2021 Q2	1.60	4,613	1.82	1,638	(13.8)	1.74	17,475	(8.4)
2021 Q3	2.10	3,046	1.83	922	13.2	1.78	7,894	15.2

Table continued.

Table V-6 Continued
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Period	U.S. purchase price	U.S. quantity	India purchase price	India quantity	India margin	Vietnam purchase price	Vietnam quantity	Vietnam margin
2018 Q1	1.95	988	1.01	7,953	48.3	0.93	4,654	52.6
2018 Q2	***	***	0.91	17,160	***	0.91	4,931	***
2018 Q3	1.98	2,288	0.89	7,367	55.0	0.85	11,291	56.9
2018 Q4	1.87	3,339	0.89	8,954	52.7	0.83	13,982	55.5
2019 Q1	1.79	1,406	0.90	5,781	49.9	0.84	10,017	52.8
2019 Q2	***	***	0.88	9,248	***	0.82	5,396	***
2019 Q3	1.85	3,015	0.84	5,451	54.8	0.81	5,593	56.2
2019 Q4	1.80	3,406	0.79	8,965	56.3	0.76	7,508	57.6
2020 Q1	1.54	1,433	0.78	6,146	49.5	0.74	8,526	51.8
2020 Q2	1.30	7,055	0.78	6,641	39.9	0.72	10,391	44.5
2020 Q3	1.70	4,573	0.77	5,734	54.7	0.72	11,990	57.6
2020 Q4	1.68	2,892	0.75	7,413	55.4	0.73	10,518	56.3
2021 Q1	1.79	1,331	0.80	7,045	55.1	0.77	10,026	56.9
2021 Q2	1.60	4,613	1.05	8,401	34.6	0.89	7,477	44.2
2021 Q3	2.10	3,046	1.20	9,779	42.8	1.04	15,322	50.7

Price in dollars per pound, quantity in 1,000 pounds, margin in percent.

Period	U.S. purchase price	U.S. quantity	Subject purchase price	Subject quantity	Subject margin
2018 Q1	1.95	988	1.18	16,911	39.8
2018 Q2	***	***	***	***	***
2018 Q3	1.98	2,288	1.16	31,510	41.3
2018 Q4	1.87	3,339	1.04	34,863	44.3
2019 Q1	1.79	1,406	1.06	26,825	40.9
2019 Q2	***	***	0.99	23,583	***
2019 Q3	1.85	3,015	1.04	24,431	44.0
2019 Q4	1.80	3,406	0.91	27,116	49.2
2020 Q1	1.54	1,433	0.86	27,629	44.0
2020 Q2	1.30	7,055	0.86	32,559	34.2
2020 Q3	1.70	4,573	***	***	***
2020 Q4	1.68	2,892	0.90	32,990	46.7
2021 Q1	1.79	1,331	1.16	33,340	35.6
2021 Q2	1.60	4,613	1.40	34,992	12.9
2021 Q3	2.10	3,046	1.28	33,917	39.2

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

Note: Product 3: Raw light amber honey (51 – 85 mm), packaged in 55-gallon drums.

Note: Petitioner raised potential decimal issue for U.S. purchase price of pricing product 3 for Q4 2020 reported by ***. Staff contacted the firm for a revision and removed the anomalous data after receiving no response.

Table V-7
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in 1,000 pounds, margin in percent.

Period	U.S. purchase price	U.S. quantity	Argentina purchase price	Argentina quantity	Argentina margin	Brazil purchase price	Brazil quantity	Brazil margin
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***

Period	U.S. purchase price	U.S. quantity	India purchase price	India quantity	India margin	Vietnam purchase price	Vietnam quantity	Vietnam margin
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***

Table continued.

Table V-7 Continued
Raw honey: Weighted-average purchase prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Period	U.S. purchase price	U.S. quantity	Subject purchase price	Subject quantity	Subject margin
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***

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

Note: Product 4: Raw amber honey (greater than 86 mm), packaged in 55-gallon drums.

Figure V-1
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

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Figure V-2
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

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Figure V-3
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

* * * * * * *

Figure V-4
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

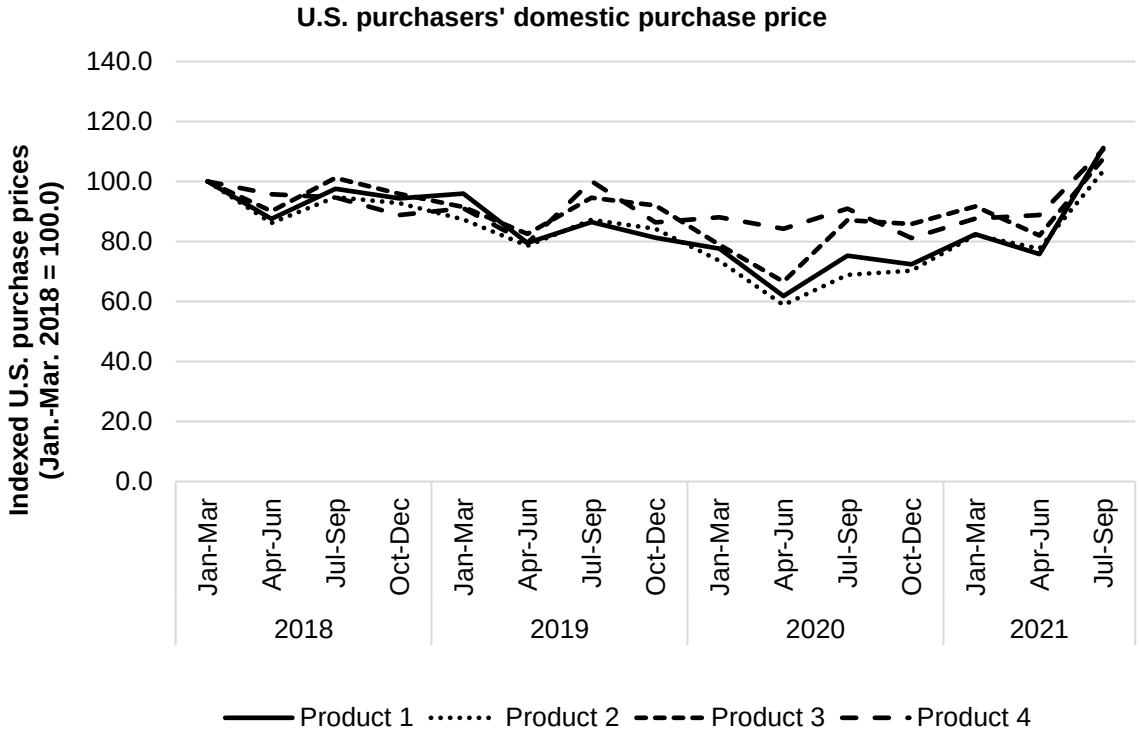
* * * * * * *

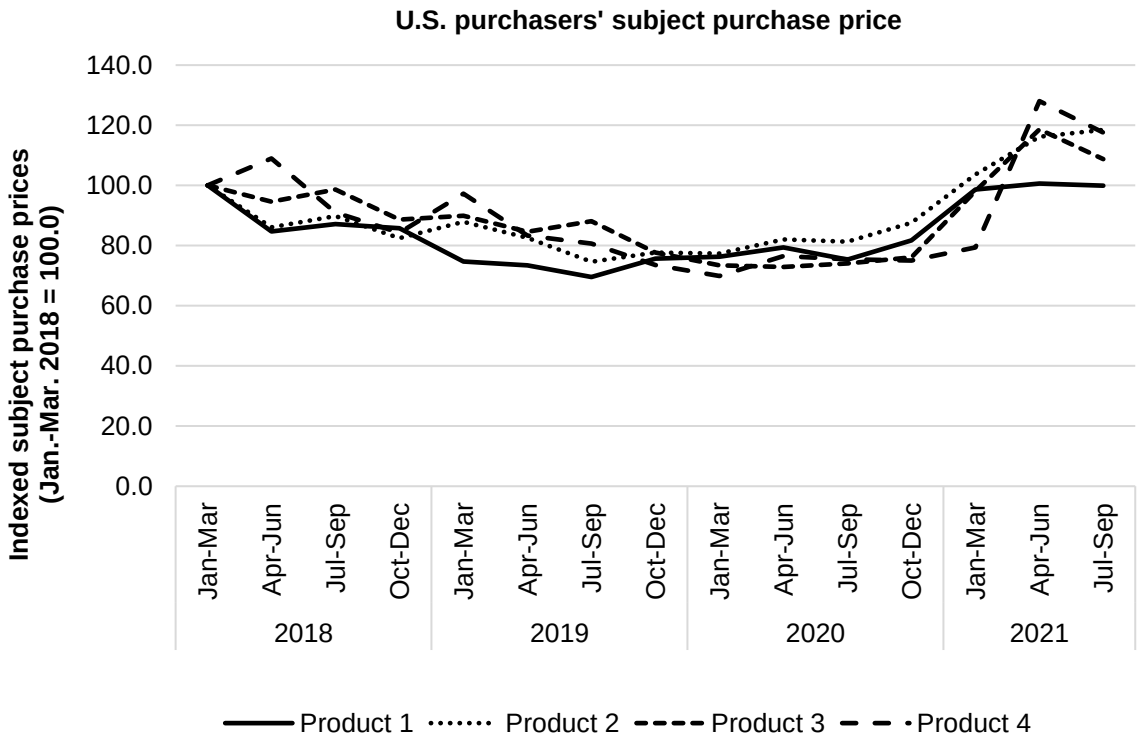
Price trends

In general, purchase prices increased for raw honey from the United States and each subject country except for Brazil during January 2018-September 2021. U.S. purchase prices generally decreased through June 2020 and then increased between June 2020 and September 2021, with upticks in purchase prices during the late summer each year (see figure V-5 and tables V-8 and V-9). Purchase prices for raw honey from subject sources also decreased through June 2020 and increased sharply in the latter part of 2020. Purchase prices of U.S. and subject raw honey were higher in the third quarter of 2021 than in the first quarter of 2018.

Table V-10 summarizes the purchase price trends, by country and by product. As shown in the table, domestic purchase price increases ranged from 3.5 percent to 11.2 percent. Purchase price increases for raw honey from individual subject countries ranged from 11.8 percent to 63.4 percent. Purchase price decreases for raw honey from Brazil ranged from *** percent to 8.4 percent.

Figure V-5
Raw honey: Indexed purchase prices, January 2018-September 2021





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

Table V-8
Raw honey: Indexed U.S. purchasers' domestic purchase prices, by quarter and product

Indexed purchases prices in percent

Period	Product 1	Product 2	Product 3	Product 4
2018 Q1	100.0	100.0	100.0	100.0
2018 Q2	84.7	86.1	94.6	109.0
2018 Q3	87.1	89.8	98.7	91.0
2018 Q4	85.8	82.4	88.6	84.3
2019 Q1	74.7	87.9	89.9	97.3
2019 Q2	73.5	82.6	84.6	83.3
2019 Q3	69.6	74.6	88.1	80.6
2019 Q4	75.7	77.6	77.7	73.6
2020 Q1	76.3	77.4	73.5	69.9
2020 Q2	79.4	82.1	72.9	76.5
2020 Q3	75.4	81.3	74.1	75.4
2020 Q4	81.7	87.6	76.1	75.1
2021 Q1	98.6	103.6	98.2	79.4
2021 Q2	100.6	116.2	118.6	128.0
2021 Q3	100.0	118.5	108.8	117.6

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

Note: Prices are indexed off the January to March 2018 starting period.

Table V-9
Raw honey: Indexed U.S. purchasers' subject source purchase prices, by quarter and product

Indexed purchases prices in percent

Period	Product 1	Product 2	Product 3	Product 4
2018 Q1	100.0	100.0	100.0	100.0
2018 Q2	84.7	86.1	94.6	109.0
2018 Q3	87.1	89.8	98.7	91.0
2018 Q4	85.8	82.4	88.6	84.3
2019 Q1	74.7	87.9	89.9	97.3
2019 Q2	73.5	82.6	84.6	83.3
2019 Q3	69.6	74.6	88.1	80.6
2019 Q4	75.7	77.6	77.7	73.6
2020 Q1	76.3	77.4	73.5	69.9
2020 Q2	79.4	82.1	72.9	76.5
2020 Q3	75.4	81.3	74.1	75.4
2020 Q4	81.7	87.6	76.1	75.1
2021 Q1	98.6	103.6	98.2	79.4
2021 Q2	100.6	116.2	118.6	128.0
2021 Q3	100.0	118.5	108.8	117.6

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

Note: Prices are indexed off the January to March 2018 starting period.

Table V-10
Raw honey: Number of quarters containing observations, low purchase price, high purchase price, and change in purchase price over period, by product and source, January 2018 through September 2021

Quantity in 1,000 pounds, price in dollars per pound, change in percent

Product	Source	Number of quarters	Quantity	Low purchase price	High purchase price	First quarter purchase price	Last quarter purchase price	Change over period
Product 1	United States	15	***	***	***	2.06	2.29	11.2
Product 1	Argentina	15	***	***	***	1.36	1.84	35.1
Product 1	Brazil	15	***	***	***	***	***	***
Product 1	India	15	***	***	***	***	***	***
Product 1	Vietnam	---	***	***	***	***	***	***
Product 2	United States	15	***	***	***	2.16	2.24	3.5
Product 2	Argentina	15	***	***	***	1.32	1.87	41.7
Product 2	Brazil	15	***	***	***	***	***	***
Product 2	India	15	***	***	***	0.96	1.17	21.9
Product 2	Vietnam	3	***	***	***	***	***	***
Product 3	United States	15	***	***	***	1.95	2.10	7.7
Product 3	Argentina	15	***	***	***	1.12	1.83	63.4
Product 3	Brazil	15	***	***	***	1.95	1.78	(8.4)
Product 3	India	15	***	***	***	1.01	1.20	19.1
Product 3	Vietnam	15	***	***	***	0.93	1.04	11.8
Product 4	United States	15	***	***	***	***	***	***
Product 4	Argentina	7	***	***	***	***	***	***
Product 4	Brazil	13	***	***	***	***	***	***
Product 4	India	6	***	***	***	***	***	***
Product 4	Vietnam	15	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2018 to the last quarter in 2021.

Price comparisons

As shown in tables V-11 and V-12, prices for product imported from subject sources were below those for U.S.-produced product in 182 of 194 instances (818 million pounds); margins of underselling ranged from 0.4 percent to 60.7 percent. In the remaining 12 instances (51 million pounds), prices for product from subject sources were between 0.1 percent and 16.2 percent above prices for the domestic product.

Subject imports were priced lower than the domestic product in the majority of instances across all four pricing products and across all four subject countries. The highest volume and greatest number of instances of lower priced purchases were for pricing product 3 (light amber). The sources with the highest volume of lower priced purchases were Argentina and India. There were instances for which imported raw honey from Argentina and Brazil were higher priced than U.S.-produced raw honey, but there were no such instances for the remaining subject sources.

Table V-11
Raw honey: Instances of lower/(higher) imported purchase prices compared to U.S. purchase prices and the range and average of margins, by product

Quantity in 1,000 pounds; margins in percent

Products	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	Lower than U.S.	40	***	***	***	***
Product 2	Lower than U.S.	46	***	***	***	***
Product 3	Lower than U.S.	57	***	***	***	***
Product 4	Lower than U.S.	39	***	***	***	***
All products	Lower than U.S.	182	818,170	37.2	0.4	60.7
Product 1	Higher than U.S.	5	***	***	***	***
Product 2	Higher than U.S.	2	***	***	***	***
Product 3	Higher than U.S.	3	***	***	***	***
Product 4	Higher than U.S.	2	***	***	***	***
All products	Higher than U.S.	12	51,134	(7.4)	(0.1)	(16.2)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-12
Raw honey: Instances of lower/(higher) imported purchase prices compared to U.S. purchase prices and the range and average of margins, by country

Quantity in 1,000 pounds; margins in percent

Sources	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Argentina	Lower than U.S.	49	***	***	***	***
Brazil	Lower than U.S.	49	***	***	***	***
India	Lower than U.S.	51	***	***	***	***
Vietnam	Lower than U.S.	33	***	***	***	***
All subject sources	Lower than U.S.	182	818,170	37.2	0.4	60.7
Argentina	Higher than U.S.	3	***	***	***	***
Brazil	Higher than U.S.	9	***	***	***	***
India	Higher than U.S.	---	***	***	***	***
Vietnam	Higher than U.S.	---	***	***	***	***
All subject sources	Higher than U.S.	12	51,134	(7.4)	(0.1)	(16.2)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Price data from USDA/AMS

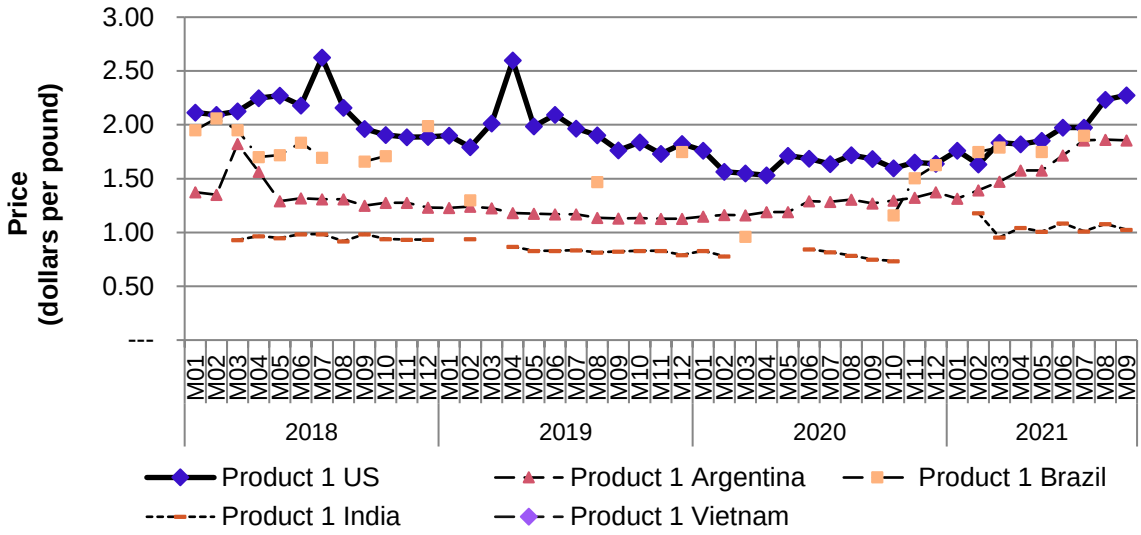
The U.S. Department of Agriculture's Agricultural Marketing Service ("USDA/AMS") publishes monthly domestic and import prices in the National Honey Report that align closely to the defined pricing products. The National Honey Report publishes prices by color, floral source, and U.S. state or import country, and presents either a single price or a low and high price depending on the number of transactions in that month.[20] AMS price data and calculated margins are presented in Appendix J. Consistent with the collected purchase price data, subject imports undersold U.S.-produced honey in the vast majority of instances (505 of 523 instances).

Price data calculated by staff from USDA/AMS National Honey Report data for the four raw honey products that closely align[21] with the pricing products are presented figures V-6 to V-9, and in the tables presented in Appendix J.

[20] Staff calculated simple averages for each month, by origin and color, by dividing the sum of prices by the number of observations. The National Honey Report does not have quantities associated with each price or price range; therefore, staff are unable to calculate weighted average prices using USDA/AMS data.

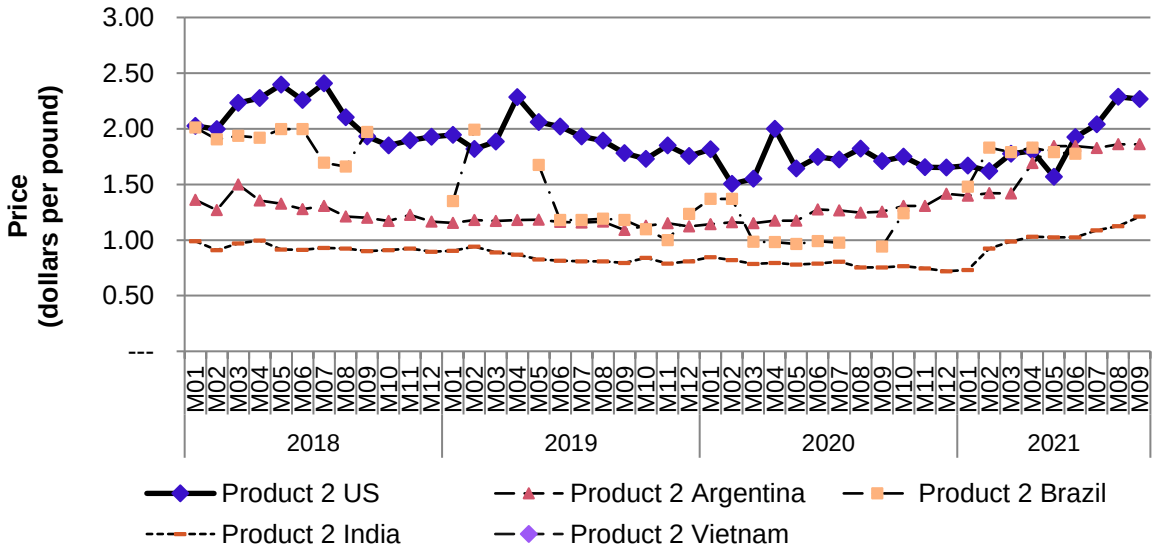
[21] Pricing products included container size in the pricing product definitions, while the four products presented in AMS data do not have container size included in the AMS product definitions.

Figure V-6
Raw honey: Prices of domestic and imported White honey (0 – 34 mm), by month, January 2018 through September 2021



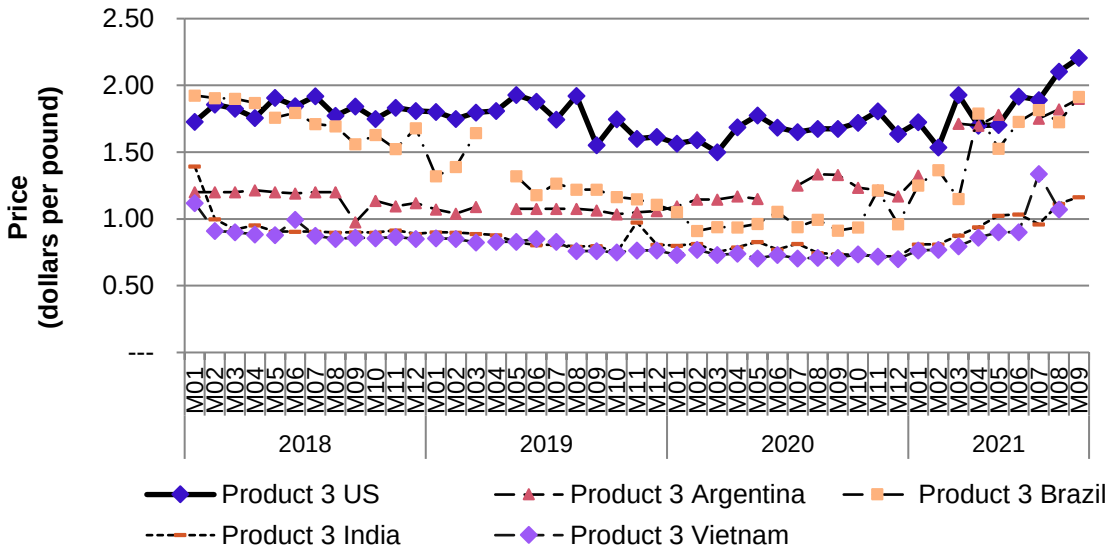
Source: Compiled from Agricultural Marketing Service (AMS) data, part of the U.S. Department of Agriculture (USDA), accessed November 23, 2021.

Figure V-7
Raw honey: Prices of domestic and imported Extra light amber honey (35 – 50 mm), by month, January 2018 through September 2021



Source: Compiled from Agricultural Marketing Service (AMS) data, part of the U.S. Department of Agriculture (USDA), accessed November 23, 2021.

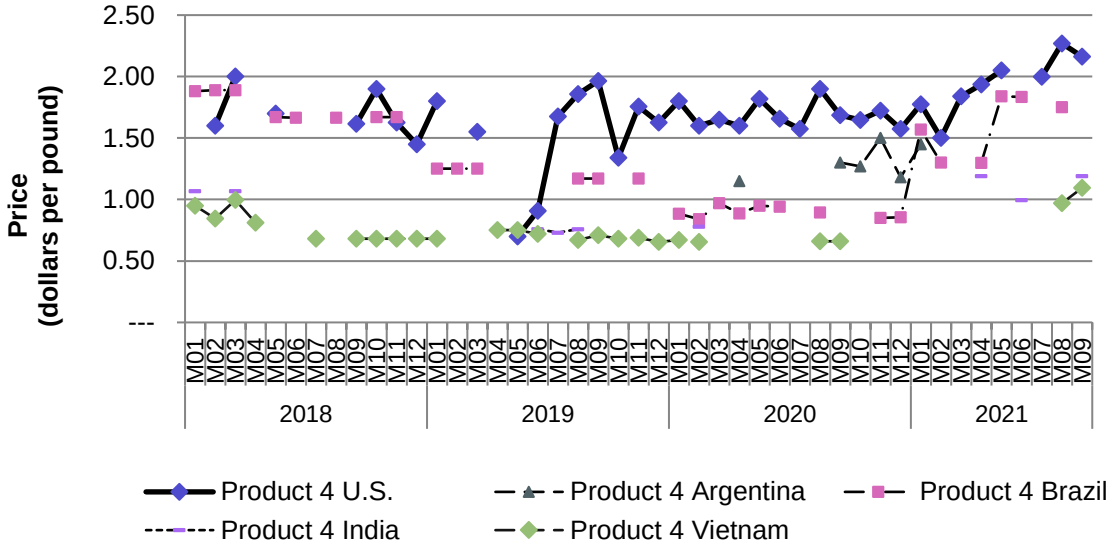
Figure V-8
Raw honey: Prices of domestic and imported Light amber honey (51 – 85 mm), by month, January 2018 through September 2021



Source: Compiled from Agricultural Marketing Service (AMS) data, part of the U.S. Department of Agriculture (USDA), accessed November 23, 2021.

Figure V-9
Raw honey: Prices of domestic and imported Amber honey (greater than 86 mm), by month, January 2018 through September 2021

Figure contains business proprietary information



Source: Compiled from Agricultural Marketing Service (AMS) data, part of the U.S. Department of Agriculture (USDA), accessed November 23, 2021.

Lost sales and lost revenue

In the preliminary phase of the investigation, the Commission requested that U.S. producers of raw honey report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of raw honey from subject countries during 2018-20. Three U.S. producers and petitioner SHA submitted lost sales and lost revenue allegations in the petition.[22] These firms identified 15 purchasers with which they lost sales or revenue; 12 consisted of lost sales allegations and three consisted of both lost sales and lost revenue allegations. In the preliminary phase, 20 purchasers submitted lost sale/lost revenue questionnaire responses.

In the final phase of the investigation, of the 47 responding large U.S. producers,[23] 40 reported that they had to reduce prices[24] and 12 reported that they had to roll back announced price increases.[25] Twenty-nine large U.S. producers reported that they had lost sales.[26]

Staff contacted 33 purchasers and received purchaser questionnaire responses from 21 purchasers. Purchasers' reported purchases of U.S.-produced raw honey and raw honey from subject sources, and the change in the domestic share of each firm's purchases from 2018 to 2020 are shown in table V-13.[27]

[22] U.S. producers *** submitted allegations. In addition, ***.

[23] Firms that produced raw honey using 3,800 colonies or more in the United States annually in 2018, 2019, or 2020 or using 3,800 colonies or more in Jan.-Sept. 2021.

[24] Five small producers also reported that they had to reduce prices.

[25] Two small producers also reported that they had to roll back announced price increases.

[26] Five small producers also reported that they had lost sales.

[27] Three purchasers (***) submitted lost sales lost revenue survey responses in the preliminary phase but did not submit purchaser questionnaire responses in the final phase.

Table V-13
Raw honey: U.S. purchasers' U.S. purchase quantity and changes in firm-level shares, by source, January 2018 - September 2021

Quantity in 1,000 pounds; change in shares in percentage points

Firm	Domestic quantity	Argentina quantity	Brazil quantity	India quantity	Vietnam quantity	Subject sources quantity	Change in domestic share (2018-2020)
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: The five purchasers (***) that were excluded from the purchase price data analysis are included in this table. End user purchasers *** reported that their honey purchases from *** are blended and may include raw honey from other sources.

Most purchasers reported that they had not purchased imports instead of domestically produced raw honey. Eight of the 21 responding purchasers reported that they had purchased subject imports instead of domestic product. Five purchasers reported purchasing imported raw honey from Argentina instead of U.S.-produced product, four reported purchasing raw honey from Brazil, six reported purchasing raw honey from India, and seven reported purchasing raw honey from Vietnam. Eight of these purchasers reported that subject import prices were lower than U.S.-produced product, but only one responded that price was a primary reason for the decision to purchase imported product instead of U.S.-produced product.[28] Purchaser *** estimated the quantity of raw honey from subject sources purchased instead of domestic product ranged from *** pounds from *** to *** pounds from *** (tables V-14 and V-15). Purchasers identified honey color and flavor profiles, organic requirements, insufficient domestic volume, more consistent quality from Argentina, and strained honey from imports, as non-price reasons for purchasing imported rather than U.S.-produced product. Responding end user purchasers highlighted that darker honeys are preferable for ingredient use and are not available in sufficient volumes from domestic producers. Purchaser *** reported that U.S.-produced raw honey is purchased directly from the beekeeper and is un-strained (filled with insect parts and wax), while imported honey has been strained to remove these. It also added that imported honey offers a blended and consistent flavor, whereas domestic honey can vary greatly from drum to drum, and exporters offer product with completed residue, origin and authenticity analysis that is unavailable prior to purchase of U.S.-produced honey.

[28] Two of five responding purchasers reported that raw honey from Brazil was not priced lower than U.S.-produced raw honey, while all responding purchasers reported that prices for Argentina, India, and Vietnam were lower.

Table V-14
Raw honey: Purchasers' responses to purchasing subject instead of domestic, 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
Argentina	5	5	1	***
Brazil	4	3	1	***
India	6	6	1	***
Vietnam	7	7	1	***
Subject sources	8	8	1	***

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

Table V-15
Raw honey: Purchasers' responses to purchasing subject instead of domestic, by firm

Quantity in 1,000 pounds

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

Table continued.

Table V-15 Continued
Raw honey: Purchasers' responses to purchasing subject instead of domestic, by firm

Quantity in 1,000 pounds

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

Table continued.

Table V-15 Continued
Raw honey: Purchasers' responses to purchasing subject instead of domestic, by firm

Quantity in 1,000 pounds

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

Table continued.

Table V-15 Continued
Raw honey: Purchasers' responses to purchasing subject instead of domestic, 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--8; No--13	Yes--8; No--0	Yes--1; No--8	***	NA

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

Of the 21 responding purchasers, one purchaser, (***), reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; two purchasers reported that they did not know. Purchaser *** reported an estimated price reduction of *** percent. Purchaser *** noted that the U.S. raw honey market and the import market work independently of each other and that one price does not dictate the other. Eighteen purchasers reported that U.S. producers had not lowered prices in order to compete with lower-priced imports.

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics.

Purchaser *** stated:

> USA honey is not a reliable source of honey in terms of quality, continuous supply, consistency, supplier reliability, and authenticity. However, some customers find 'Made in the USA' overweighs the costs of USA honey. On the other hand, all commercial consumers know that U.S. honey is not a reliable source, and a growing number of retail consumers are transitioning their specifications from a USA only blend to USA, Canadian, Argentina or USA, South American or simply the best value for the consumer. In the last 20 years, USA honey producers have transitioned their efforts from honey production to pollination. Some producers have even transitioned to focus on pollination or to produce bees for sale. While there are many factors that can plague honey production, the honey producers have proved it is possible to produce an oversupply after a record high price which in turn drove down prices. This is during a time where energy, goods and commodity prices were at the lowest point they have been in some time. Honey is only consumed at a little over 1 lb. per person per year. This is not enough consumption where supply can easily dictate the price. Even if $'s for Organic or other conventional South American crops are higher than USA honey, consumer behavior and consumption will not change because retail grocers know there is simply not enough reliable supply in the US to promote a consistent honey program. Responses to III-4 are reasonable estimates. Actual overheads costs of commercial, food service and retail honey are not available at the time of this report.

Purchaser *** stated:

> Availability of supply is the primary driver of *** purchasing patterns following its consolidation and product unification efforts in 2018. White and extra-light amber honey produced in the United States is a premium honey with the vast majority dedicated to retail sales where there are greater opportunities for profit compared to the ingredient sector. As such, the United States does not produce adequate amounts of honey to support the standardization of *** formula and for this reason, *** domestic honey purchases have declined. In order to acquire the necessary volume of honey for a standardized formula and product unification, *** transitioned to using a predominately light amber

honey formulation as it is more widely available than the white or extra-light amber honey produced in the United States.

Part VI: Financial experience of U.S. producers

Background[1]

Eighty-one firms provided usable financial results on their raw honey operations.[2] [3] Thirty-six of the usable responses were from small U.S. producers and the remaining 45 responses were from large U.S. producers.[4] The majority of responding beekeepers reported their financial data on the requested calendar-year basis.[5] Thirty-three of the 45 large U.S. producers provided their financial data on a cash basis.[6] Small U.S. producers were not asked to provide their accounting basis, but based on responses in the preliminary phase of these investigations the vast majority use cash-basis accounting.

[1] The following abbreviations may be used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] Three other companies (one small U.S. producer and two large U.S. producers) provided questionnaire responses that did not have usable financial results. These U.S. producers were ***. These companies produced a combined *** of raw honey in 2020, and accounted for *** percent of total reported 2020 production. U.S. producers' questionnaire responses, sections II-1 and III-5.

[3] As of the writing of this report, there were two responses to revision requests that were not received. As such, staff made the following adjustments in order to make their responses usable. The data were adjusted as follows: (1.) *** reported incomplete interim-period financial data. All interim-period financial data for this company were removed. In addition, ***. Staff allocated these *** to its raw honey operations based on sales revenue. (2.) The net sales quantity and value of raw honey reported by *** appeared to be the number of its colonies and net sales quantity, respectively. Staff replaced the quantity and value of the company's raw honey net sales with the reported quantity and value of its total shipments. U.S. producers' questionnaire responses, sections II-I, II-2, IV-9a, and IV-9e.

[4] As previously discussed in Part III, small U.S. producers were allowed to submit a short-form version of the questionnaire that collected general trade, financial, and employment data for the full year periods (2018, 2019, and 2020), while the large U.S. producers were required to submit the full questionnaire, which included data for the full year periods (2018, 2019, and 2020), as well as the interim periods (January-September 2020 and January-September 2021).

Due to the narrower focus of the information requested from the small U.S. producers, capital expenditures, R&D expenses, net assets, and all interim period data will be based only on the responses of the large U.S. producers.

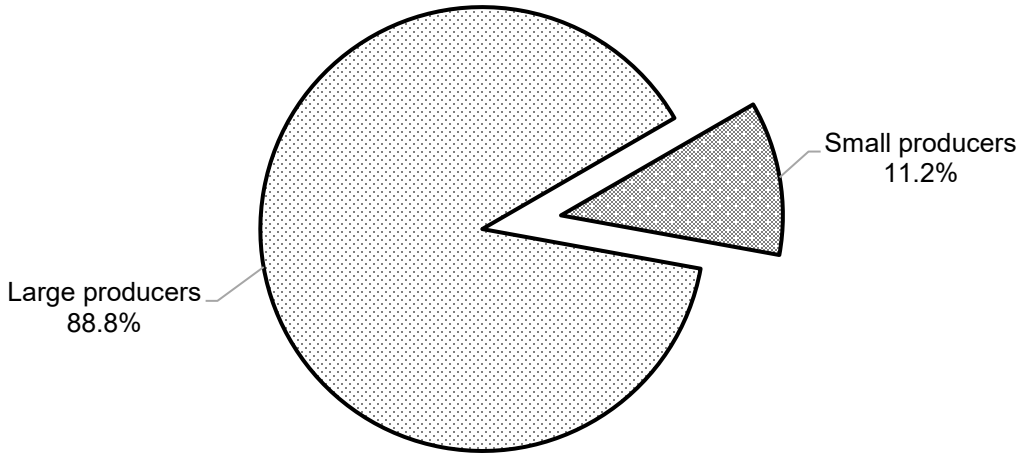
[5] A few firms were unable to provide their data on a calendar-year basis and reported their data based on their firm's fiscal year.

[6] Nine of the large U.S. producers reported their financial data on an accrual basis and three of the large U.S producers did not respond to this question.

Revenue primarily reflects commercial sales, but also includes internal consumption and transfers to related firms. Internal consumption and transfers to related firms accounted for 3.1 percent and 3.3 percent, respectively, of large producers' total U.S. shipments in 2020 and are not shown separately in this section of the report.[7]

Figure VI-1 shows that the large U.S. producers accounted for 88.8 percent of reported net sales quantity in 2020, while the small U.S. producers accounted for 11.2 percent.

Figure VI-1
Raw honey: Share of net sales quantity in 2020, by firm



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

[7] U.S. producers' questionnaire responses, section III-5. The majority of the internal consumption was reported to be raw honey that was packaged for retail. Ibid.

Cash-basis accounting

As previously mentioned, the majority of responding firms reported their financial data on a cash basis. One of the main differences between accrual accounting (the accounting basis required by GAAP) and cash-basis accounting is the timing of when revenue and expenses are recognized. This impacts the reported financial results as follows:

(1) Inventory effects: With cash-basis accounting, expenses are recorded when they are paid, and do not always appear in the same period in which any corresponding revenues are recorded.[8] With a product that can be held in inventory, such as raw honey, any changes in inventory year-over-year will result in an over- or under-statement of profitability when compared to accrual accounting. This is because in cash-basis accounting, expenses are recorded based on the amount of honey produced, rather than the amount that is sold. Any raw honey that is produced for inventory will result in production expenses incurred in the period in which the raw honey was produced with no associated revenue. Conversely, for honey sold from a previous period's inventory, with cash-basis accounting, profitability for this product would be overstated in the year sold because the associated operating expenses would have already been recorded in the period produced. Therefore, during the period the product is sold, the company would record revenue with no associated operating expenses.

(2) Payment timing: In cash-basis accounting, revenue is recorded when the cash is received rather than when the product is sold.[9] If cash for a sale is received in a period other than when the product is sold a company's reported revenue will not necessarily reflect the amount of product actually sold in a given period. In addition, if a company is paid for their product in a period following the period in which the product is sold, the effect any changes in price will have on profitability won't be seen in the company's financial results until the period following the sale.

These cash-basis accounting differences, and their impact on the raw honey financial results are discussed further in the relevant sections, below.

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[8] In accrual accounting, the "Matching Principle" requires companies to record expenses in the period in which the related revenues are earned. This allows expenses and revenues to be matched on the income statement for a given period to accurately analyze a company's performance. *Accounting Tools*, https://www.accountingtools.com/articles/2017/5/14/the-matching-principle, retrieved May 24, 2021.

[9] In accrual accounting, the "Revenue Recognition Principle" requires companies to recognize (record) revenue in the period when realized and earned – not necessarily when cash is received. *Accounting Tools,* https://www.accountingtools.com/articles/2017/5/15/the-revenue-recognition-principle, retrieved May 24, 2021.

Operations on raw honey

Table VI-1 presents aggregated data for all U.S. producers' operations in relation to raw honey, while table VI-2 presents the corresponding changes in AUVs. Table VI-3 presents aggregated data for the large U.S. producers' operations in relation to raw honey, while table VI-4 presents the corresponding changes in AUVs.

Table VI-1
Raw honey: Results of operations of all U.S. producers, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020
Total net sales	Quantity	38,425	38,348	40,897
Total net sales	Value	68,583	60,439	65,513
Operating expenses	Value	79,354	77,842	77,195
Operating income or (loss)	Value	(10,771)	(17,404)	(11,682)
All other expenses	Value	2,016	3,435	2,385
Insurance/government program income	Value	3,157	2,025	6,183
All other income	Value	1,219	1,877	2,201
Net income or (loss)	Value	(8,411)	(16,938)	(5,684)
Operating expenses	Ratio to NS	115.7	128.8	117.8
Operating income or (loss)	Ratio to NS	(15.7)	(28.8)	(17.8)
All other expenses	Ratio to NS	2.9	5.7	3.6
Insurance/government program income	Ratio to NS	4.6	3.3	9.4
All other income	Ratio to NS	1.8	3.1	3.4
Net income or (loss)	Ratio to NS	(12.3)	(28.0)	(8.7)
Total net sales	Unit value	1.78	1.58	1.60
Operating expenses	Unit value	2.07	2.03	1.89
Operating income or (loss)	Unit value	(0.28)	(0.45)	(0.29)
All other expenses	Unit value	0.05	0.09	0.06
Insurance/government program income	Unit value	0.08	0.05	0.15
All other income	Unit value	0.03	0.05	0.05
Net income or (loss)	Unit value	(0.22)	(0.44)	(0.14)
Operating losses	Count	42	50	47
Net losses	Count	37	47	35
Data	Count	80	80	79

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

Note: While these data include responses from 81 companies, the data count is less than 81 in each year because not all companies had sales of raw honey in every year.

Table VI-2
Raw honey: Changes in AUVs for all U.S. producers between comparison periods

Unit values in dollars per pound

Item	Changes Measured In	2018-20	2018-19	2019-20
Total net sales	Percent	▼(10.3)	▼(11.7)	▲1.6
Operating expenses	Percent	▼(8.6)	▼(1.7)	▼(7.0)
Total net sales	Unit value	▼(0.18)	▼(0.21)	▲0.03
Operating expenses	Unit value	▼(0.18)	▼(0.04)	▼(0.14)
Operating income or (loss)	Unit value	▼(0.01)	▼(0.17)	▲0.17
All other expenses	Unit value	▲0.01	▲0.04	▼(0.03)
Insurance/government program income	Unit value	▲0.07	▼(0.03)	▲0.10
All other income	Unit value	▲0.02	▲0.02	▲0.00
Net income or (loss)	Unit value	▲0.08	▼(0.22)	▲0.30

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

Note: Unit values shown as "0.00" represent non-zero values that are less than "0.005."

Table VI-3
Raw honey: Results of operations of large U.S. producers, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Total net sales	Quantity	34,017	33,185	36,320	28,610	32,090
Total net sales	Value	60,487	51,832	58,296	44,610	53,976
Operating expenses	Value	71,098	69,949	69,559	52,907	55,546
Operating income or (loss)	Value	(10,611)	(18,117)	(11,263)	(8,296)	(1,570)
All other expenses	Value	1,852	3,235	2,198	775	1,121
Insurance/government program income	Value	2,660	1,668	5,286	3,173	2,615
All other income	Value	1,104	1,783	2,148	975	181
Net income or (loss)	Value	(8,699)	(17,901)	(6,028)	(4,924)	104
Depreciation/amortization	Value	5,764	5,537	5,263	1,864	2,189
Cash flow	Value	(2,936)	(12,364)	(764)	(3,060)	2,293
Operating expenses	Ratio to NS	117.5	135.0	119.3	118.6	102.9
Operating income or (loss)	Ratio to NS	(17.5)	(35.0)	(19.3)	(18.6)	(2.9)
All other expenses	Ratio to NS	3.1	6.2	3.8	1.7	2.1
Insurance/government program income	Ratio to NS	4.4	3.2	9.1	7.1	4.8
All other income	Ratio to NS	1.8	3.4	3.7	2.2	0.3
Net income or (loss)	Ratio to NS	(14.4)	(34.5)	(10.3)	(11.0)	0.2
Total net sales	Unit value	1.78	1.56	1.61	1.56	1.68
Operating expenses	Unit value	2.09	2.11	1.92	1.85	1.73
Operating income or (loss)	Unit value	(0.31)	(0.55)	(0.31)	(0.29)	(0.05)
All other expenses	Unit value	0.05	0.10	0.06	0.03	0.03
Insurance/government program income	Unit value	0.08	0.05	0.15	0.11	0.08
All other income	Unit value	0.03	0.05	0.06	0.03	0.01
Net income or (loss)	Unit value	(0.26)	(0.54)	(0.17)	(0.17)	0.00
Operating losses	Count	26	32	29	24	23
Net losses	Count	23	32	22	20	21
Data	Count	44	44	44	42	42

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

Note: All 45 large U.S. producers provided full-year data and 43 of them provided usable interim-period results. The full- and partial-year data counts show 44 and 42, respectively, because not every company that provided usable data had sales of raw honey in every period.

Note: The interim period financial results are affected by cash-basis accounting. Some companies reported significantly higher or lower profitability in their interim period results compared with their full-year results. In response to questions from staff, this was usually a timing issue. For example, one company reported that it sold all of its honey in January-September, but its expenses were spread throughout the year. Another company reported that it typically sells the large majority of its honey in the fourth quarter, but still incurs/paid a large share of its expenses during January-September. Email from ***, February 24, 2022; Email from ***, March 15, 2022.

Table VI-4
Raw honey: Changes in AUVs for large U.S. producers between comparison periods

Unit values in dollars per pound

Item	Changes Measured In	2018-20	2018-19	2019-20	Jan-Sep 2020-21
Total net sales	Percent	▼(9.7)	▼(12.2)	▲2.8	▲7.9
Operating expenses	Percent	▼(8.4)	▲0.8	▼(9.1)	▼(6.4)
Total net sales	Unit value	▼(0.17)	▼(0.22)	▲0.04	▲0.12
Operating expenses	Unit value	▼(0.17)	▲0.02	▼(0.19)	▼(0.12)
Operating income or (loss)	Unit value	▲0.00	▼(0.23)	▲0.24	▲0.24
All other expenses	Unit value	▲0.01	▲0.04	▼(0.04)	▲0.01
Insurance or government program income	Unit value	▲0.07	▼(0.03)	▲0.10	▼(0.03)
All other income	Unit value	▲0.03	▲0.02	▲0.01	▼(0.03)
Net income or (loss)	Unit value	▲0.09	▼(0.28)	▲0.37	▲0.18

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

Note: Unit values shown as "0.00" represent non-zero values that are less than "0.0005."

Net sales

As seen in table VI-1, the net sales quantity of raw honey increased irregularly between 2018 and 2020, while the net sales value decreased irregularly during the same period. This resulted in the per-pound net sales AUV decreasing from $1.78 in 2018 to $1.56 in 2019 and increasing slightly to $1.60 in 2020.[10] On a company-specific basis, the net sales trends were mixed. For companies that reported net sales in both 2018 and 2020, 43 of 78 reported an increase in net sales quantity between 2018 and 2020, and 45 of 78 companies reported a decrease in their net sales revenue during the same period. However, the company-specific trends for net sales AUVs were more uniform. For companies that reported net sales in both 2018 and 2020, 60 of 78 companies experienced a decrease in their net sales AUVs from 2018 to 2020.[11]

Slightly fewer than half of the beekeepers that reported usable financial data were members of Sioux Honey Association Cooperative ("SHA"). SHA processes, packs, and sells the raw honey, and distributes any profit back to the members. SHA members are required to send virtually all of their raw honey production to the cooperative each year. Upon delivery,

[10] Between the comparable interim periods, large U.S. producers reported higher net sales quantity and value, in January-September 2021 than in January-September 2020. The net sales AUV was also higher in interim 2021, at $1.68 per pound, compared with $1.56 per pound in interim 2020 (table VI-3).

[11] Of the 41 large U.S. producers that provided usable interim-period financial results for both interim periods, 26 reported a higher net sales AUV in interim 2021 than in interim 2020, 14 reported a lower net sales AUV, and 1 company reported no change.

members receive an initial advance payment, and then receive the remainder of the payment in four or five installments throughout the year, with a final payment in July or August.[12] [13]

Many commercial beekeepers that produce raw honey also engage their honeybee colonies in other revenue-producing activities. Table VI-5 shows the share of total beekeeping sales revenue accounted for by each of these revenue-producing activities. The most common of these, commercial pollination, has grown in importance and represented 44.8 percent of total beekeeping revenue in 2020, compared to 42.2 percent in 2018.[14] [15] In addition, many companies also reported selling other products related to their beekeeping activities, such as queen bees, nucs, package bees, and beeswax.[16] [17]

Table VI-5
Raw honey: U.S. producers' revenue-producing activities, by item and period

Shares in percent and represent share of total beekeeping revenue

Item	2018	2019	2020
Sales of raw honey	41.8	38.2	38.7
Commercial pollination fees	42.2	45.8	44.8
Sales of other related products	16.0	15.9	16.4
Revenue from all beekeeping activities	100.0	100.0	100.0

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

[12] Conference transcript pp. 24-26 (Coy).

[13] With cash-basis accounting, this delay in payment means a portion of the revenue from the honey delivered to the cooperative each year will not be recorded until the following year. However, this causes the most distortion in profitability when there are large changes to the amount of product being sold year to year. SHA producers' aggregate net sales quantity did not fluctuate to a great degree, with sales between 17.9 million and 19.3 million pounds from 2018-20.

[14] Commercial pollination is a service provided in which honeybee colonies are placed near crops that require pollination. It is most common during January-March, which is considered the off-season for raw honey production. U.S. producers must transport their honeybee colonies to the locations that require the service, with California being the most common for almond pollination.

[15] During the period examined, 67 of the 81 U.S. producers provided commercial pollination. Of the 67 companies that provided commercial pollination, 65 reported their commercial pollination revenue during the final phase of these investigations. The remaining two companies (***) reported that they provided commercial pollination during 2018-20 in their questionnaire responses during the preliminary phase of these investigations. U.S. producers' questionnaire responses (preliminary), section III-7. These 67 companies had raw honey net sales quantities that accounted for 96.8 percent of the total raw honey sales volume in 2020.

[16] A nuc, short for a nucleus colony, is a small functioning beehive with 4-5 frames of bees. Package bees are a box of bees that can be easily shipped. They include a queen, but the bees are typically unrelated and from different colonies. BeekeeperFacts webpage, https://beekeeperfacts.com/what-is-the-difference-between-a-nuc-and-a-package-of-bees/, retrieved March 22, 2022.

[17] During the period examined, 52 of the 81 U.S. producers reported sales of other beekeeping-related products.

Operating expenses and operating income or loss

Expense allocations

Most beekeepers are able to isolate net sales values by revenue-producing activity, but the majority do not track and/or allocate operating expenses by revenue source.[18] During the preliminary phase of these investigations, many beekeepers reported that producing raw honey was their primary business, whether or not raw honey represented the majority of their revenue. This had an impact on the way in which these companies allocated their expenses, and it resulted in the U.S. producers using a wide range of allocation methods. In an effort to have more consistency, combined profit-and-loss data for all revenue-producing activities were collected during the final phase of these investigations, and staff has allocated shared expenses.

Each of the revenue-generating activities have direct costs that are attributable only to that product or service.[19] However, most of a beekeepers' expenses involve the caretaking of the bees and the maintenance of the beehives, which are necessary expenses whether a company is producing raw honey, providing commercial pollination services, or selling other beekeeping-related products.[20]

Staff notes that while commercial pollination and the production of raw honey are typically achieved using the same bee colonies, the engagement in one of these revenue-producing activities does not result in the other.[21] This means that even though many U.S. producers consider commercial pollination a byproduct and assigned it a relatively smaller share of their company's total expenses in the preliminary phase of these investigations,[22] for the purposes of financial analysis and expense allocations, commercial pollination is not being

[18] Raw Honey from Argentina, Brazil, India, Ukraine, and Vietnam, Inv. Nos. 731-TA-1560-1564 (Preliminary), USITC Publication 5204, June 2021 ("Preliminary publication"), p. VI-9.

[19] Preliminary publication, p. VI-10. Examples of these direct costs include transportation and labor costs to transport bees to pollination locations for commercial pollination services or labor and supplies to extract honey for the production of honey.

[20] For all U.S. producers, revenues were collected separately for raw honey, commercial pollination, and for all other beekeeping-related products, but expenses were collected on a combined basis for all products and services. All companies with commercial pollination revenue were asked to report the share of their colonies used in commercial pollination services in each period. Large U.S. producers were also asked to provide further detail on their expenses, including any direct operating expenses by revenue-producing activity and the portion of all other non-operating expenses, all other income, and insurance proceeds/government program income that should be allocated to raw honey.

[21] Commercially-viable raw honey is not typically produced during commercial pollination. The types of crops that bees pollinate affects the amount and flavor of the raw honey produced. The crops that typically require commercial pollination often only provide bees with enough raw honey to feed themselves, but not enough to sell commercially. Hearing transcript, pp. 16, 57 (Hiatt).

[22] Preliminary publication, p. VI-10.

treated as a byproduct of raw honey production. Instead, it is being treated in a manner similar to an out-of-scope product produced with shared assets and employees.[23]

Shared operating expenses were allocated to raw honey based on a combination of the share of colonies used in commercial pollination services and sales revenue.[24] [25] Shared operating expenses were allocated in the same way for large and small U.S. producers. However, while all small U.S. producers' operating expenses were classified as "shared," and thus allocated, large U.S. producers' shared operating expenses were the portion of total operating expenses that remained once the direct operating expenses, by activity, were removed.[26]

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[23] One way in which a company can account for a byproduct is by charging the revenues received for the product against total COGS. This results in all profitability being assigned to the main product, as the revenue and COGS for the byproduct cancel out. Accounting for Management website, https://www.accountingformanagement.org/recognition-of-gross-revenue-method-of-costing-by-products/, retrieved April 22, 2022. Conversely, with shared equipment or employees, costs would be assigned and allocated between the revenue-producing activities using the most appropriate method, and profitability is shared between the products.

[24] For more information on the formula used for these allocations, *see* EDIS Document 766815, *Allocation of U.S. Producers' Shared Operating Expenses Reported at Questions II-2 and IV-9d*.

[25] Companies with commercial pollination revenue that did not provide the share of their colonies used for this service in response to staff questions, were assumed to have used all colonies in commercial pollination services. For large U.S. producers, any reported direct operating expenses for raw honey production were added to the allocated portion of shared operating expenses to calculate the raw honey operating expense.

[26] Petitioners consider the allocation method to be conservative because it doesn't account for the amount of time spent conducting each activity, which they indicated was six months for honey production and three months for commercial pollination. Petitioners' prehearing brief, pp. 57-58. Direct labor, which represents a large share of a beekeepers' production costs, is an example of a cost that would be more accurately allocated based on time than on sales revenue. According to a report cited in respondents' prehearing brief, direct labor can account for 50 percent of a beekeepers' production costs. Respondents' prehearing brief, Exh. 25, p. 36. In addition, overhead production costs are also frequently allocated to a product based on the relative number of direct labor hours used. Lanen, L., Anderson, S., Maher, M. (2014). *Fundamentals of Cost Accounting* (4th ed.). McGraw-Hill/Irwin, pp. 212-214.

Therefore, staff agrees that the amount of production costs that were allocated to the raw honey financial results are likely somewhat understated because of the difference in the amount of time spent between commercial pollination and raw honey production, particularly for companies that reported only shared operating expenses (i.e., all small producers and some large producers). However, SG&A expenses, which are also included in operating expenses, are more commonly allocated based on sales revenue. Since production costs and SG&A expenses were collected combined (as operating expenses), it is not possible to allocate production costs based on time and SG&A costs based on sales revenue.

Operating expenses and results

As seen in table VI-1, operating expenses for raw honey decreased from 2018 to 2020.[27] As a ratio to net sales, operating expenses increased from 115.7 percent in 2018 to 128.8 percent in 2019, and then decreased to 117.8 percent in 2020.[28] On a per-pound basis, operating expenses decreased from $2.07 in 2018 to $1.89 in 2020.

While a majority of U.S. producers (50) reported a decrease in their operating expense AUVs between 2018 and 2020,[29] the overall decrease in the operating expense AUVs was largely the result of decreases reported by three U.S. producers and was also somewhat attributable to the allocation of expenses between commercial pollination and raw honey production. Despite there being an increase in the amount of honey sold from 2018 to 2020, the amount of operating expenses that were allocated to raw honey production decreased because of a decrease in the total net sales value of raw honey and an increase in the commercial pollination revenue. Additionally, for reasons discussed further below, *** had high operating expenses with relatively low net sales quantities in the three annual-year periods. However, the company had a ***, which resulted in the company's operating expense AUV decreasing from $*** per pound in 2018 to $*** per pound in 2020. The two other large U.S. producers that had the most impact on the total operating expense AUVs were *** and ***, which each reported decreases of $*** and $*** per pound, respectively, between 2018 and 2020. Both companies reported increases in their ***

[27] The traditional components of total operating expenses (COGS and SG&A expenses) were not collected separately because of the way in which records are kept by many companies in agricultural industries (namely, many farmers rely on their IRS Schedule F, "Profit or Loss from Farming," to report requested financial information).

[28] The large U.S. producers reported higher operating expenses in interim 2021 than during the same period in 2020 (table VI-3). The large U.S. producers' operating expenses as a ratio to net sales was 118.6 percent in interim 2020 and 102.9 percent in interim 2021.

[29] The large U.S. producers' operating expense AUV was $1.85 per pound in interim 2020 and $1.73 per pound in interim 2021 (table VI-3). The higher operating expense AUV in interim 2020 was largely attributable to ***. The company reported per-pound operating expense AUVs of $*** in interim 2020 and $*** in interim 2021. Excluding this company, the large U.S. producers' operating expense AUVs were $*** per pound in interim 2020 and $*** per pound in interim 2021.

*** between 2018 and 2020, which would at least partially explain the decreases in their operating expense AUVs.[30] [31]

Operating income worsened irregularly; it was a loss of $10.8 million in 2018, a loss of $17.4 million in 2019, and a loss of $11.7 million in 2020. The number of U.S. producers reporting operating losses was 42 of 80 companies with reportable financial results in 2018, 50 of 80 companies in 2019, and 47 of 79 companies in 2020.[32] [33]

[30] *** net sales matched its production volumes in each year examined. *** net sales did not always match its production volume, but it sold slightly less than it produced in 2018 and slightly more than it produced in 2020. U.S. producers' questionnaire responses, section III-5. In response to questions from Staff, *** also indicated that its 2018 operating expenses were higher due to ***. Email from ***.

[31] If the data from these three companies were excluded, the raw honey operating expense AUVs would have decreased by $0.06 per pound, rather than $0.18 per pound, between 2018 and 2020. In addition to the exclusion of these companies' data, if the allocation of the total operating expense had remained at the 2018 level throughout the annual year periods, the operating expense AUVs would have decreased by $0.02 per pound between 2018 and 2020.

[32] As seen in table VI-3, the large U.S. producers reported operating losses of $8.3 million and $1.6 million in interim 2020 and interim 2021, respectively. The number of large U.S. producers reporting an operating loss was lower in interim 2021 (23 of 40 large U.S. producers) than during interim 2020 (24 of 40 large U.S. producers).

[33] Respondents assert that commercial pollination can have negative effects on a beekeepers' raw honey operations by causing a decline in bee health and lower honey production. Respondents' prehearing brief, pp. 22-23, 70; Respondents' posthearing brief, Exh. 1, pp. 23-25. While petitioners disagreed with this characterization at the hearing, if commercial pollination does, in fact, negatively affect raw honey production, it would mean that any increase by beekeepers in the amount of commercial pollination services provided could result in a decrease in the amount of honey revenue received per colony. While staff cannot quantify these effects, it should also be noted that based on the way in which costs were allocated, a decrease in honey revenue because of an increase in commercial pollination would also decrease the amount of shared operating expenses allocated to raw honey operations. This would slightly lessen, but not remove, the overall negative effect on raw honey profitability if an increase in commercial pollination results in a decrease in raw honey yield.

Cash-basis adjustments

As discussed previously, cash-basis accounting can have numerous effects on the reliability of using a company's profit and loss data for financial analysis. For the profitability of raw honey, the most pronounced impact is from companies that produced honey that was held for sale in later years, or, in interim 2021, sales of raw honey that was produced in previous periods.

*** of the U.S. producers reported a net sales quantity that differed from their production quantity in at least one full- or partial-year period, however, there were three *** companies, ***, that had an outsized impact on these data.[34] These companies reported that ***.

***, produced between *** and *** pounds of honey in 2018-2020. However, the company *** sold ***, ***, and *** percent of the quantity it produced in 2018, 2019, and 2020, respectively. The company reported that its sales were *** in those years because it ***. The company further reported that ***.[35] Conversely, in interim 2021 the company sold *** than it produced, which would make the company *** profitable than it would if accrual accounting had been used.[36]

*** reported selling *** of its 2018 production of raw honey in that year, but reported *** sales of raw honey in 2019 and 2020 despite producing *** and *** pounds in those years, respectively. In response to questions from staff, the company indicated that ***. The company further reported that ***.[37] Conversely, in interim 2021 the company sold *** than it produced, which would make the company appear *** than it would if accrual accounting had been used.[38]

[34] These companies are the *** largest U.S. producers, by 2020 production. U.S. producers' questionnaire responses, section III-5.

[35] Email from ***. *** U.S. producers' questionnaire response, section III-5.

[36] *** U.S. producers' questionnaire response, sections III-5 and IV-9a.

[37] Email from ***.

[38] *** U.S. producers' questionnaire response, sections III-5 and IV-9a.

*** reported selling *** of its 2018 production and selling *** than it produced in 2020. However, in 2019 the company sold *** pounds of raw honey it produced. In response to questions by staff, the company reported that in 2019 ***.[39] [40] Conversely, in interim 2021, the company reported selling *** percent *** than it produced, which would make the company appear *** profitable than it would if accrual accounting had been used.[41]

Converting these companies' financial results from a cash-basis to accrual-accounting is not possible with the data available. Instead, Appendix N shows the industry's financial results excluding these companies, as well as what the industry's financial results would have been had these companies decided to, or in the case of ***, sell all of their production in each period.

[39] Email from ***.

[40] Staff notes that *** reported using GAAP as its accounting basis, which requires accrual accounting. However, when staff asked the company ***. This response seems to indicate that the company relied on *** for its financial results. Email from ***.

[41] *** U.S. producers' questionnaire response, sections III-5 and IV-9a.

All other expenses and net income or loss

Below operating income are all other non-operating expenses, insurance proceeds/ government program income, and all other income.[42] As seen in table VI-1, all other expenses increased irregularly between 2018 and 2020. Insurance proceeds and government program income decreased from $3.2 million in 2018 to $2.0 million in 2019 and then increased to $6.2 million in 2020.[43] This income category was reported by 36 companies in 2018, 34 companies in 2019, and 48 companies in 2020.[44] The last post-operating income item, all other income, increased from 2018 to 2020. The combined post-operating income items were more than all other expenses in each period, which resulted in the industry's net losses being smaller than its operating losses. The industry's net losses increased from a loss of $8.4 million in 2018 to a loss of $16.9 million in 2019, before decreasing to a loss of $5.7 million in 2020.[45] Similarly, because of post-operating income, fewer companies reported net losses than reported operating losses in each period.[46]

[42] For post-operating income line items, large U.S. producers were asked to identify the amounts that should be allocated to raw honey, whereas staff allocated these items for the small U.S. producers based on sales revenue.

[43] Certain government programs can provide financial assistance to beekeepers. The Emergency Assistance for Livestock, Honey Bees, and Farm-raised Fish program ("ELAP") provides financial assistance to eligible producers of honeybees for losses due to disease, certain adverse weather events or loss conditions, including blizzards and wildfires. ELAP General Fact Sheet, Farm Service Agency, https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/FactSheets/elap-general-fact-sheet.pdf, retrieved May 25, 2021. The Noninsured Crop Disaster Assistance Program provides financial assistance to producers of uninsurable crops, including honey, when low yields, loss of inventory, or prevented planting occur due to natural disasters. Noninsured Crop Disaster Assistance Program Fact Sheet, Farm Service Agency, https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/FactSheets/noninsured_crop_disaster_assistance_program-nap-fact_sheet.pdf, retrieved May 24, 2021.

[44] *** companies reported receiving government funds in 2020 from the U.S. Small Business Administration-backed Paycheck Protection Program. U.S. producers' questionnaire responses, sections II-2 and IV-9a.

[45] The large U.S. producers reported a net income of $104,000 in interim 2021, which was an improvement from the loss of $4.9 million reported in interim 2020.

[46] A variance analysis is not shown due to the variety of cost structures and accounting bases used among the reporting firms, as well as having interim period data for some, but not all, companies.

Capital expenditures, R&D expenses, assets, and return on assets

Table VI-6 presents data on the large U.S. producers' capital expenditures, R&D expenses, total net assets, and the operating ROA. Capital expenditures were reported by 26 large U.S. producers. The companies that reported capital expenditures described them as: vehicles/forklifts (15 companies); bee equipment/bee boxes/beehives (9 companies); honey extraction buildings/equipment (6 companies); other buildings/employee housing/land (8 companies); storage buildings/equipment/tanks (3 companies), and honey bees (two companies).[47]

R&D expenses were reported by 3 large U.S. producers. One of the companies described its R&D expenses as ***. The second company described these expenses as being used to ***. The last company reported its R&D expenses were fees associated with ***.[48]

Total net assets were reported by 38 of 45 large U.S. producers. The increase in reported assets was mainly attributable to an increase in net assets reported by ***, which reported a $*** increase from 2018 to 2020. The company described its net assets as ***.[49] A large share of the increase in the company's assets is likely attributable to the increase in its ***. The company's *** increased by *** between 2018 and 2020. If the company were to *** based on its *** in each year, the value of its *** account would have increased by $*** from 2018 to 2020.[50] The large U.S. producers' operating ROA was negative 6.2, negative 10.4, and negative 6.0 percent in 2018, 2019, and 2020, respectively.[51]

[47] U.S. producers' questionnaire responses, section IV-13b.

[48] *** U.S. producers' questionnaire response, section IV-13b. Bee Informed Partnership is a "national collaboration of leading research labs and universities in agricultural science to better understand honey bee declines in the United States." The nonprofit provides independent colony health assessments, colony sampling, full pest and pathogen diagnostics, and reporting of assessments. Bee Informed webpage, https://beeinformed.org/about/, retrieved March 16, 2022.

[49] *** U.S. producers' questionnaire response, section IV-12b.

[50] Calculated from *** U.S. producers' questionnaire response, section III-5.

[51] 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 for a specific product.

Table VI-6
Raw honey: Large U.S. producers' capital expenditures, R&D costs, total net assets, and ROA, by item and period

Values in 1,000 dollars; ratio in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Capital expenditures	14,923	15,725	12,059	7,791	6,071
R&D expenses	***	***	***	***	***
Total net assets	152,912	156,425	168,154		
Operating ROA	(6.2)	(10.4)	(6.0)		

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

Note: The operating ROA represents the ratio of operating income or loss to net assets. The operating income or loss of companies that did not report total net assets were not included in the calculation of operating ROA.

Capital and investment

The Commission requested U.S. producers of raw honey to describe any actual or potential negative effects of imports of raw honey from Argentina, Brazil, India, Ukraine, and Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-7 presents the number of firms reporting an impact in each category and table VI-8 provides the U.S. producers' narrative responses.

Table VI-7
Raw honey: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2018, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	10
Denial or rejection of investment proposal	Investment	3
Reduction in the size of capital investments	Investment	16
Return on specific investments negatively impacted	Investment	14
Other investment effects	Investment	18
Any negative effects on investment	Investment	45
Rejection of bank loans	Growth	5
Lowering of credit rating	Growth	2
Problem related to the issue of stocks or bonds	Growth	1
Ability to service debt	Growth	11
Other growth and development effects	Growth	27
Any negative effects on growth and development	Growth	41
Anticipated negative effects of imports	Future	45

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

Note: In addition to the 45 large U.S. producers, responses to these questions are included from the 2 large U.S. producers that did not provide usable financial data, as well as 1 small U.S. producer that provided responses to these questions.

Table VI-8
Raw honey: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2018

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
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	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***

Item	Firm name and narrative on impact of imports
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***

Item	Firm name and narrative on impact of imports
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Rejection of bank loans	***
Rejection of bank loans	***
Rejection of bank loans	***
Rejection of bank loans	***

Item	Firm name and narrative on impact of imports
Rejection of bank loans	***
Lowering of credit rating	***
Lowering of credit rating	***
Problem related to the issue of stocks or bonds	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***

Item	Firm name and narrative on impact of imports
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
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Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***

Item	Firm name and narrative on impact of imports
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
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Anticipated effects of imports	***

Item	Firm name and narrative on impact of imports
Anticipated effects of imports	***
Anticipated effects of imports	***
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Anticipated effects of imports	***
Anticipated effects of imports	***
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Anticipated effects of imports	***
Anticipated effects of imports	***

Item	Firm name and narrative on impact of imports
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
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 VII: Threat considerations and information on nonsubject countries

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

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the volume and pricing of imports of the subject merchandise is presented in *Parts IV* and *V*; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in *Part VI*. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting"; any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in Argentina

The Commission issued foreign producers' or exporters' questionnaires to 14 firms believed to produce and/or export raw honey from Argentina.[3] Thirteen firms provided usable responses to the Commission's questionnaire: Asociación de Cooperativas Argentinas C.L. ("ACA Coop"), Compania Inversora Platense S.A. ("Cipsa"), D'ambros Maria De Los Angeles D'ambros Maria Daniela SH ("D'Ambros Maria"), Geomiel S.A. ("Geomiel), Gruas San Blas S.A. ("Gruas San Blas"), Industrial Haedo S.A. ("Haedo"), Honey & Grains SRL ("Honey and Grains"), Naiman S.A. ("Naiman"), Newsan S.A. ("Newsan"), Nexco S.A. ("Nexco"), Patagonik Food S.A. ("Patagonik"), Promiel SRL ("Promiel"), and Villamora S.A. ("Villamora"). These firms' exports to the United States accounted for approximately 97.1 percent of U.S. imports of raw honey from Argentina in 2020. According to industry information for Argentina from the Food and Agriculture Organization of the United Nations (FAO), the procurement of raw honey in Argentina reported in questionnaires is equivalent to 84.4 percent of overall production of raw honey in Argentina in 2020.[4] Table VII-1 presents information on the raw honey operations of the responding producers and exporters in Argentina while table VII-2 presents industry information for Argentina from FAO during 2018-20. According to estimates requested of the responding producers, the procurement of raw honey in Argentina reported by individual firms ranges between *** and *** percent of overall production of raw honey in Argentina.

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

[4] As the vast majority of responding foreign firms process and export raw honey collected from independent beekeepers, the foreign producers' questionnaires in these investigations requested that responding firms report the amount of raw honey the firms procured from both independent beekeepers and their own beekeeping operations.

Table VII-1
Raw honey: Summary data for producers in Argentina, 2020

Firm	Procurement from beekeepers (1,000 pounds)	Share of reported procurement (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)
ACA Coop	***	***	***	***	***	***
Cipsa	***	***	***	***	***	***
D'Ambros Maria	***	***	***	***	***	***
Geomiel	***	***	***	***	***	***
Gruas San Blas	***	***	***	***	***	***
Haedo	***	***	***	***	***	***
Honey and Grains	***	***	***	***	***	***
Naiman	***	***	***	***	***	***
Newsan	***	***	***	***	***	***
Nexco	***	***	***	***	***	***
Patagonik	***	***	***	***	***	***
Promiel	***	***	***	***	***	***
Villamora	***	***	***	***	***	***
All firms	138,501	100.0	85,032	100.0	146,088	58.2

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

Table VII-2
Raw honey: Total industry information from FAO for Argentina, by period

Item	2018	2019	2020
Production population (1,000 beehives)	2,974	2,979	2,983
Production (1,000 pounds)	175,197	173,821	164,030
Yield (pounds per beehive)	58.9	58.4	55.0

Source: Food and Agriculture Organization statistics, accessed February 28, 2022.

Changes in operations

As presented in table VII-3 producers in Argentina reported several operational and organizational changes since January 1, 2018.

Table VII-3
Raw honey: Reported changes in operations in Argentina since January 1, 2018, by firm

Item	Firm name and accompanying narrative response
Expansion in availability from beekeeper suppliers	***
Reduction in availability from beekeeper suppliers	***

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

Operations on raw honey

Table VII-4 presents information on the raw honey operations of the responding producers and exporters in Argentina. Procurement increased irregularly by 4.5 percent during 2018-20 and was roughly equivalent in January-September ("interim") 2020 and interim 2021. Procurement is projected to be 12.2 percent higher in 2022 than in 2020. End-of-period inventories decreased by 38.5 percent during 2018-20 and were 8.0 percent higher in interim 2021 than in interim 2020. They are projected to be 35.3 percent higher in 2022 than in 2020. Inventories as a ratio to procurement decreased by 9.3 percentage points from 2018-20, were 1.1 percentage points higher in interim 2021 than in interim 2020, and are projected to be 2.7 percentage points higher in 2022 than in 2020.

Aggregate home market shipments for responding producers in Argentina increased by 135.6 percent during 2018-20 and were 16.0 percent higher in interim 2021 than in interim 2020. They are projected to decrease by 39.0 percent in 2022 than in 2020. (The share of home market shipments devoted to internal consumption was never more than *** percent in any period.) Exports to the United States increased by 25.9 percent during 2018-20 and were 12.6 percent higher in interim 2021 than in interim 2020. Exports to the United States are projected to be 5.1 percent lower in 2022 than in 2020. Exports to all other markets decreased by 2.3 percent during 2018-20 and were 25.6 percent lower in interim 2021 than in interim 2020, but are projected to be 20.3 percent higher in 2022 than in 2020.

During 2018-20, the share of exports to the United States ranged between 52.4 and 61.2 percent of all shipments, it was 66.1 percent in interim 2021, and it is projected to decrease 5.5 percentage points from 2020 to 2022. The ratio of inventories to total shipments decreased during 2018-20 by 10.6 percentage points and was 1.6 percentage points higher in interim 2021

than in interim 2020. This ratio is projected to increase by 3.7 percentage points from 2020 to 2022.

Table VII-4
Raw honey: Data on industry in Argentina, by period

Quantity in 1,000 pounds

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Procurement from beekeepers	132,509	124,528	138,501	116,787	116,240	135,599	155,456
End-of-period inventories	29,948	24,502	18,409	20,024	21,636	25,369	24,900
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	736	1,117	1,734	954	1,106	1,215	1,058
Exports to the United States	67,565	79,549	85,032	65,292	73,499	78,390	80,716
Exports to all other markets	60,718	49,386	59,323	49,256	36,641	47,479	71,344
Export shipments	128,283	128,934	144,355	114,547	110,140	125,868	152,059
Total shipments	129,019	130,051	146,088	115,501	111,247	127,083	153,117

Table continued.

Table VII-4 Continued
Raw honey: Data on industry in Argentina, by period

Shares and ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Inventory ratio to procurement	22.6	19.7	13.3	12.9	14.0	18.7	16.0
Inventory ratio to total shipments	23.2	18.8	12.6	13.0	14.6	20.0	16.3
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	0.6	0.9	1.2	0.8	1.0	1.0	0.7
Exports to the United States share	52.4	61.2	58.2	56.5	66.1	61.7	52.7
Exports to all other markets share	47.1	38.0	40.6	42.6	32.9	37.4	46.6
Export shipments share	99.4	99.1	98.8	99.2	99.0	99.0	99.3
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

Responding Argentine firms did not appear to produce other products on the same equipment and machinery used to produce raw honey.[5]

Exports

According to GTA, the leading export markets for natural honey[6] from Argentina are the United States, Germany, and Japan (table VII-5). During 2020, the United States was the leading export market for raw honey from Argentina, accounting for 60.3 percent of exports, followed by Germany, accounting for 22.5 percent, and then followed by Japan, accounting for 6.8 percent. Unit values for exports of raw honey from Argentina to the United States decreased from $1.06 per pound to $0.97 per pound during 2018-19 and then increased to $1.04 per pound in 2020. Unit values for exports to all destination markets decreased from $1.12 per pound to $1.01 per pound during 2018-19 and then increased to $1.08 in 2020.

[5] ***.

[6] Natural honey classified under HTS subheading 0409.00 includes all forms of honey and may include raw, processed, and honey packaged for retail sale; thus, this subheading may include product outside the scope of these investigations.

Table VII-5
Natural Honey: Exports from Argentina, by destination market and by period

Quantity in 1,000 pounds; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	83,293	82,127	85,682
Germany	Quantity	28,565	20,169	31,975
Japan	Quantity	8,253	10,672	9,689
Belgium	Quantity	5,279	5,465	4,671
France	Quantity	1,945	5,254	4,358
Italy	Quantity	4,819	3,523	3,322
Spain	Quantity	3,821	1,745	1,138
Saudi Arabia	Quantity	145	---	519
Switzerland	Quantity	1,167	1,200	448
All other destination markets	Quantity	1,802	884	187
All destination markets	Quantity	139,089	131,039	141,989
United States	Value	88,204	79,534	89,302
Germany	Value	35,144	21,569	36,026
Japan	Value	10,418	12,747	11,740
Belgium	Value	6,081	5,658	4,954
France	Value	2,292	5,765	4,950
Italy	Value	5,475	3,727	3,702
Spain	Value	4,310	1,662	1,233
Saudi Arabia	Value	172	---	577
Switzerland	Value	1,408	1,199	442
All other destination markets	Value	2,082	828	195
All destination markets	Value	155,586	132,689	153,120

Table continued.

Table VII-5 Continued
Natural Honey: Exports from Argentina, by destination market and by period

Unit values in dollars per pound; shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	1.06	0.97	1.04
Germany	Unit value	1.23	1.07	1.13
Japan	Unit value	1.26	1.19	1.21
Belgium	Unit value	1.15	1.04	1.06
France	Unit value	1.18	1.10	1.14
Italy	Unit value	1.14	1.06	1.11
Spain	Unit value	1.13	0.95	1.08
Saudi Arabia	Unit value	1.18	---	1.11
Switzerland	Unit value	1.21	1.00	0.99
All other destination markets	Unit value	1.16	0.94	1.05
All destination markets	Unit value	1.12	1.01	1.08
United States	Share of quantity	59.9	62.7	60.3
Germany	Share of quantity	20.5	15.4	22.5
Japan	Share of quantity	5.9	8.1	6.8
Belgium	Share of quantity	3.8	4.2	3.3
France	Share of quantity	1.4	4.0	3.1
Italy	Share of quantity	3.5	2.7	2.3
Spain	Share of quantity	2.7	1.3	0.8
Saudi Arabia	Share of quantity	0.1	---	0.4
Switzerland	Share of quantity	0.8	0.9	0.3
All other destination markets	Share of quantity	1.3	0.7	0.1
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 0409.00 as reported by Argentina's National Institute of Statistics & Census (INDEC) in the Global Trade Atlas database, accessed February 28, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. Data include honey packaged for retail level sale.

The industry in Brazil

The Commission issued foreign producers' or exporters' questionnaires to 15 firms believed to produce and/or export raw honey from Brazil.[7] Ten firms provided usable responses to the Commission's questionnaire: Apidouro Comercial Exportadora e Importadora Ltda ("Apiduoro"), Apis Nativa Agroindustrial Exportadora Ltda. ("Apis Nativa"), Breyer E Cia Ltda ("Breyer"), Central de Cooperativas Apícolas do Semiárido Brasileiro, ("CASA APIS"), Cooperativa Mista dos Apicultores da Microrregiao de Simplicio Mendes ("Comapi"), Flora Néctar Industria Comércio Importação Exportação Ltda ("Flora Nectar"), Matrunita da Amazônia Apicultura LTDA ("Matrunita"), Melbras Importadora e Exportadora Agroindústria Ltda ("Melbras"), Minamel Agroindústria Ltda. ("Minamel"), and Apiario Diamante Comercial Exportadora Ltda ("Super Mel").[8] These firms' exports to the United States accounted for approximately 81.6 percent of U.S. imports of raw honey from Brazil in 2020. According to industry information for Brazil from the FAO, the procurement of raw honey in Brazil reported in questionnaires is equivalent to 80.2 percent of overall production of raw honey in Brazil in 2020.[9] Table VII-6 presents information on the raw honey operations of the responding producers and exporters in Brazil while table VII-7 presents industry information for Brazil from FAO during 2018-20. According to estimates requested of the responding producers, the procurement of raw honey in Brazil reported by individual firms ranges between *** and *** percent of overall production of raw honey in Brazil.

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

[8] Wenzel's Apicultura Comercio Industria Importação e Exportação Ltda. ("Wenzel's"), a company which responded in the preliminary phase of these investigations, provided correspondence to staff with certain information on its operations for this final phase investigation. The company reported procuring *** pounds of raw honey in 2020, of which *** pounds (or *** percent) was exported to the U.S. The firm estimates it accounted for *** percent of exports to the U.S. in 2020.

[9] As the vast majority of responding foreign firms process and export raw honey collected from independent beekeepers, the foreign producers' questionnaires in these investigations requested that responding firms report the amount of raw honey the firms procured from both independent beekeepers and their own beekeeping operations.

Table VII-6
Raw honey: Summary data for producers in Brazil, 2020

Firm	Procurement from beekeepers (1,000 pounds)	Share of reported procurement (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)
Apidouro	***	***	***	***	***	***
Apis Nativa	***	***	***	***	***	***
Breyer	***	***	***	***	***	***
CASA APIS	***	***	***	***	***	***
Comapi	***	***	***	***	***	***
Flora Nectar	***	***	***	***	***	***
Matrunita	***	***	***	***	***	***
Melbras	***	***	***	***	***	***
Minamel	***	***	***	***	***	***
Super Mel	***	***	***	***	***	***
All firms	91,119	100.0	61,524	100.0	84,734	72.6

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

Table VII-7
Raw honey: Total industry information from FAO for Brazil, by period

Item	2018	2019	2020
Production population (1,000 beehives)	1,020	1,025	1,031
Production (1,000 pounds)	93,185	100,974	113,556
Yield (pounds per beehive)	91.4	98.5	110.1

Source: Food and Agriculture Organization statistics, accessed February 28, 2022.

Changes in operations

As presented in table VII-8 producers in Brazil reported several operational and organizational changes since January 1, 2018.

Table VII-8
Raw honey: Reported changes in operations in Brazil since January 1, 2018, by firm

Item	Firm name and accompanying narrative response
Expansion in availability from beekeeper suppliers	***
Weather related events	***

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

Operations on raw honey

Table VII-9 presents information on the raw honey operations of the responding producers and exporters in Brazil. Procurement increased by 50.8 percent during 2018-20 and was 9.4 percent lower in interim 2021 than in interim 2020. Procurement is projected to be 7.5 percent lower in 2022 than in 2020. End-of-period inventories increased by 47.6 percent during 2018-20 and were 38.3 percent lower in interim 2021 than in interim 2020. They are projected to be 25.3 percent lower in 2022 than in 2020. Inventories as a ratio to procurement decreased by 0.5 percentage points from 2018-20, were 7.0 percentage points lower in interim 2021 than in interim 2020, and are projected to be 4.1 percentage points lower in 2022 than in 2020.

Aggregate home market shipments for responding producers in Brazil increased by 20.4 percent during 2018-20 and were 1.1 percent lower in interim 2021 than in interim 2020. They are projected to decrease by 4.3 percent from 2020 to 2022. The share of home market shipments devoted to internal consumption ranged from *** to *** percent in any period. Exports to the United States increased by 34.5 percent during 2018-20 and were 8.2 percent higher in interim 2021 than in interim 2020. Exports to the United States are projected to be 7.3 percent lower in 2022 than in 2020. Exports to all other markets increased by 75.6 percent during 2018-20 and were 36.8 percent higher in interim 2021 than in interim 2020, and are projected to be 25.4 percent higher in 2022 than in 2020.

During 2018-20, the share of exports to the United States ranged between 72.6 and 81.5 percent of all shipments, it was 68.5 percent in interim 2021, and it is projected to decrease 5.4 percentage points from 2020 to 2022. The ratio of inventories to total shipments increased during 2018-20 by 1.0 percentage point and was 11.4 percentage points lower in interim 2021 than in interim 2020. This ratio is projected to decrease by 5.8 percentage points from 2020 to 2022.

Table VII-9
Raw honey: Data on industry in Brazil, by period

Quantity in 1,000 pounds

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Procurement from beekeepers	60,427	62,141	91,119	70,817	64,133	80,876	84,268
End-of-period inventories	13,032	14,041	19,237	20,700	12,778	16,077	14,371
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	3,757	3,100	4,523	4,078	4,034	4,809	4,328
Exports to the United States	45,746	49,438	61,524	44,674	48,347	56,475	57,008
Exports to all other markets	10,642	8,131	18,687	13,303	18,197	22,481	23,441
Export shipments	56,388	57,569	80,211	57,977	66,544	78,956	80,448
Total shipments	60,145	60,669	84,734	62,054	70,578	83,765	84,776

Table continued.

Table VII-9 Continued
Raw honey: Data on industry in Brazil, by period

Shares and ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Inventory ratio to procurement	21.6	22.6	21.1	21.9	14.9	19.9	17.1
Inventory ratio to total shipments	21.7	23.1	22.7	25.0	13.6	19.2	17.0
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	6.2	5.1	5.3	6.6	5.7	5.7	5.1
Exports to the United States share	76.1	81.5	72.6	72.0	68.5	67.4	67.2
Exports to all other markets share	17.7	13.4	22.1	21.4	25.8	26.8	27.7
Export shipments share	93.8	94.9	94.7	93.4	94.3	94.3	94.9
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

Responding Brazilian firms did not appear to produce other products on the same equipment and machinery used to produce raw honey.

Exports

According to GTA, the leading export markets for natural honey from Brazil are the United States, Germany, and Canada (table VII-10). During 2020, the United States was the

leading export market for raw honey from Brazil, accounting for 74.6 percent of exports, followed by Germany, accounting for 11.7 percent, and then followed by Canada, accounting for 3.9 percent. Unit values for exports of raw honey from Brazil to the United States decreased from $1.48 per pound to $1.02 per pound during 2018-19 and then decreased to $0.95 per pound in 2020. Unit values for exports to all destination markets decreased from $1.52 per pound to $1.03 per pound during 2018-19 and then decreased to $0.98 in 2020.

Table VII-10
Natural honey: Exports from Brazil, by destination market and by period

Quantity in 1,000 pounds; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	49,851	53,300	75,240
Germany	Quantity	6,438	4,109	11,823
Canada	Quantity	2,107	2,778	3,941
Australia	Quantity	83	741	3,339
Belgium	Quantity	668	1,021	1,867
Netherlands	Quantity	1,067	1,065	1,197
United Kingdom	Quantity	981	1,408	1,139
Denmark	Quantity	350	573	637
Panama	Quantity	141	337	371
All other destination markets	Quantity	1,198	893	1,259
All destination markets	Quantity	62,885	66,224	100,814
United States	Value	73,751	54,213	71,265
Germany	Value	11,107	4,765	13,222
Canada	Value	3,229	3,001	4,285
Australia	Value	156	703	3,043
Belgium	Value	1,047	1,155	1,870
Netherlands	Value	1,735	1,035	1,193
United Kingdom	Value	1,474	1,520	1,159
Denmark	Value	518	659	671
Panama	Value	112	172	358
All other destination markets	Value	2,278	1,160	1,495
All destination markets	Value	95,408	68,384	98,560

Table continued.

Table VII-10 Continued
Natural honey: Exports from Brazil, by destination market and by period

Unit value in dollars per pound; shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	1.48	1.02	0.95
Germany	Unit value	1.73	1.16	1.12
Canada	Unit value	1.53	1.08	1.09
Australia	Unit value	1.88	0.95	0.91
Belgium	Unit value	1.57	1.13	1.00
Netherlands	Unit value	1.63	0.97	1.00
United Kingdom	Unit value	1.50	1.08	1.02
Denmark	Unit value	1.48	1.15	1.05
Panama	Unit value	0.79	0.51	0.97
All other destination markets	Unit value	1.90	1.30	1.19
All destination markets	Unit value	1.52	1.03	0.98
United States	Share of quantity	79.3	80.5	74.6
Germany	Share of quantity	10.2	6.2	11.7
Canada	Share of quantity	3.4	4.2	3.9
Australia	Share of quantity	0.1	1.1	3.3
Belgium	Share of quantity	1.1	1.5	1.9
Netherlands	Share of quantity	1.7	1.6	1.2
United Kingdom	Share of quantity	1.6	2.1	1.1
Denmark	Share of quantity	0.6	0.9	0.6
Panama	Share of quantity	0.2	0.5	0.4
All other destination markets	Share of quantity	1.9	1.3	1.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 0409.00 as reported by Brazil's Foreign Trade Secretariat (SECEX) in the Global Trade Atlas database, accessed February 28, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. Data include honey packaged for retail level sale.

The industry in India

The Commission issued foreign producers' or exporters' questionnaires to 13 firms believed to produce and/or export raw honey from India.[10] Nine firms provided usable responses to the Commission's questionnaire: Allied Natural Product ("Allied Natural"), Ambrosia Natural Products India Pvt Ltd ("Ambrosia"), Apis India Limited ("Apis"), Brij Honey Private Limited ("Brij Honey"), Ganpati Natural Products ("Ganpati"), Indocan Honey Pvt Ltd ("Indocan"), Kejriwal Bee Care India Private Limited ("Kejriwal"), Shakti ApiFoods Pvt. Ltd. ("Shakti Apifoods"), and Yieppie Internationals ("Yieppie"). These firms' exports to the United States accounted for approximately 105.6 percent of U.S. imports of raw honey from India in 2020. According to industry information for India from the FAO, the procurement of raw honey in India reported in questionnaires is equivalent to 130.1 percent of overall production of raw honey in India in 2020.[11] Table VII-11 presents information on the raw honey operations of the responding producers and exporters in India while table VII-12 presents industry information for India from FAO during 2018-20. According to estimates requested of the responding producers, the procurement of raw honey in India reported by individual firms ranges between *** and *** percent of overall production of raw honey in India.

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

[11] As the vast majority of responding foreign firms process and export raw honey collected from independent beekeepers, the foreign producers' questionnaires in these investigations requested that responding firms report the amount of raw honey the firms procured from both independent beekeepers and their own beekeeping operations.

***.

Table VII-11
Raw honey: Summary data for producers in India, 2020

Firm	Procurement from beekeepers (1,000 pounds)	Share of reported procurement (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)
Allied Natural	***	***	***	***	***	***
Ambrosia	***	***	***	***	***	***
Apis	***	***	***	***	***	***
Brij Honey	***	***	***	***	***	***
Ganpati	***	***	***	***	***	***
Indocan	***	***	***	***	***	***
Kejriwal	***	***	***	***	***	***
Shakti Apifoods	***	***	***	***	***	***
Yieppie	***	***	***	***	***	***
All firms	178,176	100.0	87,280	100.0	173,562	50.3

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

Table VII-12
Raw honey: Total industry information from FAO for India, by period

Item	2018	2019	2020
Production population (1,000 beehives)	12,107	12,166	12,203
Production (1,000 pounds)	137,121	136,825	136,977
Yield (pounds per beehive)	11.3	11.2	11.2

Source: Food and Agriculture Organization statistics, accessed February 28, 2022.

Changes in operations

As presented in table VII-13 producers in India reported several operational and organizational changes since January 1, 2018.

Table VII-13
Raw honey: Reported changes in operations in India since January 1, 2018, by firm

Item	Firm name and accompanying narrative response
Expansion in availability from beekeeper suppliers	***
Changes in labor availability or costs	***

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

Operations on raw honey

Table VII-14 presents information on the raw honey operations of the responding producers and exporters in India. Procurement increased by 12.5 percent during 2018-20 and was 31.3 percent higher in interim 2021 than in interim 2020. Procurement is projected to be 50.5 percent higher in 2022 than in 2020. End-of-period inventories decreased by 37.0 percent during 2018-20 and were 22.4 percent lower in interim 2021 than in interim 2020. They are projected to be 82.6 percent higher in 2022 than in 2020. Inventories as a ratio to procurement decreased by 5.4 percentage points from 2018-20, were 4.0 percentage points lower in interim 2021 than in interim 2020, and are projected to be 1.5 percentage points higher in 2022 than in 2020.

Aggregate home market shipments for responding producers in India increased by 19.9 percent during 2018-20 and were 21.5 percent higher in interim 2021 than in interim 2020. They are projected to increase by 23.1 percent from 2020 to 2022. The share of home market shipments devoted to internal consumption ranged from *** to *** percent in any period. Exports to the United States decreased by 12.5 percent during 2018-20 and were 58.6 percent higher in interim 2021 than in interim 2020. Exports to the United States are projected to be 77.2 percent higher in 2022 than in 2020. Exports to all other markets decreased by 17.6 percent during 2018-20, and were 3.1 percent lower in interim 2021 than in interim 2020, and are projected to be 25.3 percent higher in 2022 than in 2020.

During 2018-20, the share of exports to the United States ranged between 50.3 and 66.4 percent of all shipments, it was 59.6 percent in interim 2021, and it is projected to increase 9.0 percentage points from 2020 to 2022. The ratio of inventories to total shipments decreased during 2018-20 by 4.1 percentage points and was 4.7 percentage points lower in interim 2021 than in interim 2020. This ratio is projected to increase by 1.5 percentage points from 2020 to 2022.

Table VII-14
Raw honey: Data on industry in India, by period

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

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Procurement from beekeepers	158,340	178,118	178,176	132,668	174,258	221,243	268,210
End-of-period inventories	19,474	14,751	12,266	17,399	13,497	14,837	22,403
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	67,242	55,579	80,608	55,038	66,859	101,383	99,238
Exports to the United States	99,788	118,217	87,280	65,689	104,186	110,740	154,624
Exports to all other markets	6,886	4,331	5,674	3,773	3,655	6,324	7,108
Export shipments	106,675	122,548	92,954	69,462	107,841	117,063	161,732
Total shipments	173,916	178,127	173,562	124,500	174,699	218,446	260,970

Table continued.

Table VII-14 Continued
Raw honey: Data on industry in India, by period

Shares and ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Inventory ratio to procurement	12.3	8.3	6.9	9.8	5.8	6.7	8.4
Inventory ratio to total shipments	11.2	8.3	7.1	10.5	5.8	6.8	8.6
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	38.7	31.2	46.4	44.2	38.3	46.4	38.0
Exports to the United States share	57.4	66.4	50.3	52.8	59.6	50.7	59.2
Exports to all other markets share	4.0	2.4	3.3	3.0	2.1	2.9	2.7
Export shipments share	61.3	68.8	53.6	55.8	61.7	53.6	62.0
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

No firms in India reported producing other products on the same equipment and machinery used to produce raw honey.

Exports

According to GTA, the leading export markets for natural honey from India are the United States, United Arab Emirates, and Saudi Arabia (table VII-15). During 2020, the United States was the leading export market for raw honey from India, accounting for 75.6 percent of exports, followed by United Arab Emirates, accounting for 4.7 percent, and then followed by Saudi Arabia, accounting for 4.7 percent. Unit values for exports of raw honey from India to the United States decreased from $0.75 per pound to $0.65 per pound during 2018-19 and then decreased to $0.60 per pound in 2020. Unit values for exports to all destination markets decreased from $0.80 per pound to $0.70 per pound during 2018-19 and then decreased to $0.69 in 2020.

Table VII-15
Natural honey: Exports from India, by destination market and by period

Quantity in 1,000 pounds; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	105,383	119,820	91,379
United Arab Emirates	Quantity	3,993	4,579	5,676
Saudi Arabia	Quantity	4,535	4,621	5,656
Nepal	Quantity	1,294	1,607	2,649
Morocco	Quantity	1,493	2,318	2,391
Canada	Quantity	1,353	1,727	2,163
Bangladesh	Quantity	1,066	1,413	1,949
Qatar	Quantity	947	1,513	1,555
Libya	Quantity	1,190	749	1,023
All other destination markets	Quantity	7,108	5,729	6,473
All destination markets	Quantity	128,361	144,075	120,914
United States	Value	78,778	77,420	54,906
United Arab Emirates	Value	3,978	4,234	5,124
Saudi Arabia	Value	4,853	4,893	5,750
Nepal	Value	1,201	1,209	1,766
Morocco	Value	1,211	1,703	1,606
Canada	Value	1,179	1,609	1,956
Bangladesh	Value	863	1,139	1,645
Qatar	Value	1,403	1,777	1,856
Libya	Value	1,020	718	919
All other destination markets	Value	7,935	6,276	7,580
All destination markets	Value	102,421	100,978	83,109

Table continued.

Table VII-15 Continued
Natural honey: Exports from India, by destination market and by period

Unit value in dollars per pound; shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	0.75	0.65	0.60
United Arab Emirates	Unit value	1.00	0.92	0.90
Saudi Arabia	Unit value	1.07	1.06	1.02
Nepal	Unit value	0.93	0.75	0.67
Morocco	Unit value	0.81	0.73	0.67
Canada	Unit value	0.87	0.93	0.90
Bangladesh	Unit value	0.81	0.81	0.84
Qatar	Unit value	1.48	1.17	1.19
Libya	Unit value	0.86	0.96	0.90
All other destination markets	Unit value	1.12	1.10	1.17
All destination markets	Unit value	0.80	0.70	0.69
United States	Share of quantity	82.1	83.2	75.6
United Arab Emirates	Share of quantity	3.1	3.2	4.7
Saudi Arabia	Share of quantity	3.5	3.2	4.7
Nepal	Share of quantity	1.0	1.1	2.2
Morocco	Share of quantity	1.2	1.6	2.0
Canada	Share of quantity	1.1	1.2	1.8
Bangladesh	Share of quantity	0.8	1.0	1.6
Qatar	Share of quantity	0.7	1.1	1.3
Libya	Share of quantity	0.9	0.5	0.8
All other destination markets	Share of quantity	5.5	4.0	5.4
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 0409.00 as reported by India's Ministry of Commerce in the Global Trade Atlas database, accessed February 28, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. Data include honey packaged for retail level sale.

The industry in Vietnam

The Commission issued foreign producers' or exporters' questionnaires to 25 firms believed to produce and/or export raw honey from Vietnam.[12] Usable responses to the Commission's questionnaire were received from 21 firms: Ban Me Thuot Honeybee Joint Stock Company ("Ban Me Thuot Honeybee"), Bao Nguyen Honeybee Co., Ltd ("Bao Nguyen Honey Bee"), Bee Honey Corporation of Ho Chi Minh City ("Bee Honey Ho Chi Minh"), Daisy Honey Bee JSC ("Daisy Honey"), Dak Nguyen Hong Exploitation of Honey Company Limited TA ("Dak Nguyen"), Dongnai Honeybee Corporation ("Dongnai Honey Bee"), Hai Phong Honeybee Company Limited ("Hai Phong Honey Bee"), Hanoi Honey Bee Joint Stock Company ("Hanoi JSC Honey Bee"), Hung Binh Phat Bees Company Limited / Hung Binh Phat Co., Ltd. ("HBP Honey Bee"), Hoa Viet Honey Bee Co., Ltd ("Hoa Viet Honey Bee"), Hoang Tri Honey Bee Co., Ltd ("Hoang Tri"), DakLak Honeybee Joint Stock Company ("Honey Bee Dak Lak"), Huong Rung Co., Ltd ("Huong Rung"), Nhieu Loc Company Limited ("Nhieu Loc"), Phongson Co., Ltd ("Phongson"), Saigon Bees Co., Ltd. ("Saigon Bees"), Southern Honey Bee Company Limited ("Southern Honey"), Thanh Hao Bees Company Limited ("Thanh Hao Bees"), Viet Thanh Food Co., Ltd ("Viet Thanh"), Vinawax Producing Trading and Service Company Limited ("Vinawax"), and Worldwide Vietfoods Co., Ltd ("Worldwide Vietfoods"). These firms' exports to the United States accounted for approximately 92.1 percent of U.S. imports of raw honey from Vietnam in 2020. According to industry information for Vietnam from the FAO, the procurement of raw honey in Vietnam reported in questionnaires is equivalent to 246.5 percent of overall production of raw honey in Vietnam in 2020.[13] Table VII-16 presents information on the raw honey operations of the responding producers and exporters in Vietnam while table VII-17 presents industry information for Vietnam from FAO during 2018-20. According to estimates requested of the responding producers, the procurement of raw honey in Vietnam reported by individual firms ranges between *** and *** percent of overall production of raw honey in Vietnam.

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

[13] As the vast majority of responding foreign firms process and export raw honey collected from independent beekeepers, the foreign producers' questionnaires in these investigations requested that responding firms report the amount of raw honey the firms procured from both independent beekeepers and their own beekeeping operations.

Table VII-16
Raw honey: Summary data for producers in Vietnam, 2020

Firm	Procurement from beekeepers (1,000 pounds)	Share of reported procurement (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)
Ban Me Thuot Honeybee	***	***	***	***	***	***
Bao Nguyen Honey Bee	***	***	***	***	***	***
Bee Honey Ho Chi Minh	***	***	***	***	***	***
Daisy Honey	***	***	***	***	***	***
Dak Nguyen	***	***	***	***	***	***
Dongnai Honey Bee	***	***	***	***	***	***
Hai Phong Honey Bee	***	***	***	***	***	***
Hanoi JSC Honey Bee	***	***	***	***	***	***
HBP Honey Bee	***	***	***	***	***	***
Hoa Viet Honey Bee	***	***	***	***	***	***
Hoang Tri	***	***	***	***	***	***
Honey Bee Dak Lak	***	***	***	***	***	***
Huong Rung	***	***	***	***	***	***
Nhieu Loc	***	***	***	***	***	***
Phongson	***	***	***	***	***	***
Saigon Bees	***	***	***	***	***	***
Southern Honey	***	***	***	***	***	***
Thanh Hao Bees	***	***	***	***	***	***
Viet Thanh	***	***	***	***	***	***
Vinawax	***	***	***	***	***	***
Worldwide Vietfoods	***	***	***	***	***	***
All firms	116,855	100.0	102,598	100.0	118,510	86.6

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

Table VII-17
Raw honey: Total industry information from FAO for Vietnam, by period

Item	2018	2019	2020
Production population (1,000 beehives)	254	253	253
Production (1,000 pounds)	45,007	48,164	47,399
Yield (pounds per beehive)	177.4	190.5	187.3

Source: Food and Agriculture Organization statistics, accessed February 28, 2022.

Changes in operations

As presented in table VII-18 producers in Vietnam reported several operational and organizational changes since January 1, 2018.

Table VII-18
Raw honey: Reported changes in operations in Vietnam since January 1, 2018, by firm

Item	Firm name and accompanying narrative response
Expansion in availability from beekeeper suppliers	***
Expansion in availability from beekeeper suppliers	***
Expansion in availability from beekeeper suppliers	***
Reduction in availability from beekeeper suppliers	***
Began basic filtering operations	***
Ceased basic filtering operations	***
Ceased basic filtering operations	***
Ceased basic filtering operations	***

Item	Firm name and accompanying narrative response
Weather related events	***
Weather related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Other (e.g., technology)	***
Other (e.g., technology)	***
Other (e.g., technology)	***

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

Operations on raw honey

Table VII-19 presents information on the raw honey operations of the responding producers and exporters in Vietnam. Procurement increased by 57.6 percent during 2018-20 and was 2.3 percent lower in interim 2021 than in interim 2020. Procurement is projected to be 26.0 percent lower in 2022 than in 2020. End-of-period inventories decreased by 29.7 percent during 2018-20 and were 63.4 percent lower in interim 2021 than in interim 2020. They are projected to be 46.9 percent lower in 2022 than in 2020. Inventories as a ratio to procurement decreased by 14.6 percentage points from 2018-20, were 14.9 percentage points lower in interim 2021 than in interim 2020, and are projected to be 3.3 percentage points lower in 2022 than in 2020.

Aggregate home market shipments for responding producers in Vietnam increased by 48.4 percent during 2018-20 and were 12.9 percent higher in interim 2021 than in interim 2020. They are projected to decrease by 18.4 percent from 2020 to 2022. The share of home market shipments devoted to internal consumption ranged from *** to *** percent in 2018-20. Exports to the United States increased by 52.7 percent during 2018-20 and were 18.2 percent higher in interim 2021 than in interim 2020. Exports to the United States are projected to be 50.0 percent lower in 2022 than in 2020. Exports to all other markets increased by 62.7 percent during 2018-20, were 25.9 percent higher in interim 2021 than in interim 2020, and are projected to be 198.4 percent higher in 2022 than in 2020.

During 2018-20, the share of exports to the United States ranged between 86.6 and 87.1 percent of all shipments, it was 86.7 percent in interim 2021, and it is projected to decrease 23.1 percentage points from 2020 to 2022. The ratio of inventories to total shipments decreased during 2018-20 by 13.6 percentage points and was 19.5 percentage points lower in interim 2021 than in interim 2020. This ratio is projected to decrease by 2.6 percentage points from 2020 to 2022.

Table VII-19
Raw honey: Data on industry in Vietnam, by period

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

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Procurement from beekeepers	74,149	75,278	116,855	102,831	100,473	107,740	86,468
End-of-period inventories	19,510	20,774	13,722	32,681	11,949	7,968	7,283
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	5,575	5,843	8,276	7,000	7,901	9,012	6,756
Exports to the United States	67,200	62,969	102,598	75,267	89,003	97,436	51,346
Exports to all other markets	4,693	3,498	7,636	4,570	5,754	6,398	22,789
Export shipments	71,892	66,468	110,234	79,836	94,757	103,834	74,135
Total shipments	77,467	72,311	118,510	86,836	102,658	112,846	80,891

Table continued.

Table VII-19 Continued
Raw honey: Data on industry in Vietnam, by period

Shares and ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Inventory ratio to procurement	26.3	27.6	11.7	23.8	8.9	7.4	8.4
Inventory ratio to total shipments	25.2	28.7	11.6	28.2	8.7	7.1	9.0
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	7.2	8.1	7.0	8.1	7.7	8.0	8.4
Exports to the United States share	86.7	87.1	86.6	86.7	86.7	86.3	63.5
Exports to all other markets share	6.1	4.8	6.4	5.3	5.6	5.7	28.2
Export shipments share	92.8	91.9	93.0	91.9	92.3	92.0	91.6
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

No responding firms in Vietnam produced other products on the same equipment and machinery used to produce raw honey.

Exports

According to GTA, the leading export markets for natural honey from Vietnam are the United States, the United Kingdom, and Indonesia (table VII-20). During 2020, the United States was the leading export market for raw honey from Vietnam, accounting for 91.3 percent of exports, followed by the United Kingdom, accounting for 3.5 percent, and then followed by Indonesia, accounting for 1.7 percent. Unit values for exports of raw honey from Vietnam to the United States decreased from $0.65 per pound to $0.58 per pound during 2018-19 and then decreased to $0.54 per pound in 2020. Unit values for exports to all destination markets decreased from $0.66 per pound to $0.59 per pound during 2018-19 and then decreased to $0.56 in 2020.

Table VII-20
Natural honey: Exports from Vietnam, by destination market and by period

Quantity in 1,000 pounds; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	86,325	81,526	111,706
United Kingdom	Quantity	2,953	3,673	4,225
Indonesia	Quantity	651	1,053	2,129
Canada	Quantity	476	285	1,200
Thailand	Quantity	658	381	761
Taiwan	Quantity	1,025	961	587
Germany	Quantity	187	315	436
Austria	Quantity	266	67	321
Poland	Quantity	392	359	259
All other destination markets	Quantity	1,359	1,095	778
All destination markets	Quantity	94,291	89,715	122,402
United States	Value	56,197	47,306	60,430
United Kingdom	Value	2,283	2,536	2,865
Indonesia	Value	588	867	1,545
Canada	Value	372	209	1,010
Thailand	Value	623	325	634
Taiwan	Value	820	761	489
Germany	Value	141	249	343
Austria	Value	208	53	235
Poland	Value	223	210	150
All other destination markets	Value	1,184	823	604
All destination markets	Value	62,638	53,340	68,305

Table continued.

Table VII-20 Continued
Natural honey: Exports from Vietnam, by destination market and by period

Unit value in dollars per pound; shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	0.65	0.58	0.54
United Kingdom	Unit value	0.77	0.69	0.68
Indonesia	Unit value	0.90	0.82	0.73
Canada	Unit value	0.78	0.73	0.84
Thailand	Unit value	0.95	0.85	0.83
Taiwan	Unit value	0.80	0.79	0.83
Germany	Unit value	0.75	0.79	0.79
Austria	Unit value	0.78	0.79	0.73
Poland	Unit value	0.57	0.59	0.58
All other destination markets	Unit value	0.87	0.75	0.78
All destination markets	Unit value	0.66	0.59	0.56
United States	Share of quantity	91.6	90.9	91.3
United Kingdom	Share of quantity	3.1	4.1	3.5
Indonesia	Share of quantity	0.7	1.2	1.7
Canada	Share of quantity	0.5	0.3	1.0
Thailand	Share of quantity	0.7	0.4	0.6
Taiwan	Share of quantity	1.1	1.1	0.5
Germany	Share of quantity	0.2	0.4	0.4
Austria	Share of quantity	0.3	0.1	0.3
Poland	Share of quantity	0.4	0.4	0.2
All other destination markets	Share of quantity	1.4	1.2	0.6
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official import statistics of imports from Vietnam (constructed export statistics for Vietnam) under HS subheading 0409.00 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed March 25, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. Data include honey packaged for retail level sale.

Subject countries combined

Table VII-21 presents summary data on raw honey operations of the reporting subject producers in the subject countries. Procurement in the subject countries increased by 23.3 percent during 2018-20 and was 7.6 percent higher in interim 2021 than in interim 2020. Procurement is projected to be 13.3 percent higher in 2022 than in 2020. End-of-period inventories in the subject countries decreased by 22.4 percent during 2018-20 and were 34.1 percent lower in interim 2021 than in interim 2020. They are projected to be 8.4 percent higher in 2022 than in 2020. Inventories as a ratio to procurement decreased by 7.1 percentage points from 2018-20, were 6.2 percentage points lower in interim 2021 than in interim 2020, and are projected to be 0.5 percentage points lower in 2022 than in 2020.

Aggregate home market shipments for responding producers in subject countries increased by 23.1 percent during 2018-20 and were 19.1 percent higher in interim 2021 than in interim 2020. They are projected to increase by 17.1 percent from 2020 to 2022. The share of home market shipments devoted to internal consumption ranged from 7.4 to 9.7 percent in 2018-20. Exports to the United States increased by 20.0 percent during 2018-20 and were 25.6 percent higher in interim 2021 than in interim 2020. Exports to the United States are projected to be 2.2 percent higher in 2022 than in 2020. Exports to all other markets increased by 10.1 percent during 2018-20, were 9.4 percent lower in interim 2021 than in interim 2020, and are projected to be 36.5 percent higher in 2022 than in 2020.

During 2018-20, the share of exports to the United States ranged between 63.6 and 70.3 percent of all shipments, it was 68.6 percent in interim 2021, and it is projected to decrease 5.1 percentage points from 2020 to 2022. The ratio of inventories to total shipments decreased during 2018-20 by 6.4 percentage points and was 7.7 percentage points lower in interim 2021 than in interim 2020. This ratio is projected to decrease by 0.3 percentage points from 2020 to 2022.

Table VII-21
Raw honey: Data on the industry in subject countries, by period

Quantity in 1,000 pounds

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Procurement from beekeepers	425,425	440,065	524,651	423,104	455,104	545,457	594,402
End-of-period inventories	81,963	74,068	63,634	90,804	59,859	64,250	68,956
Internal consumption	42,159	32,617	50,677	32,424	36,250	72,141	64,334
Commercial home market shipments	35,151	33,021	44,463	34,645	43,650	44,278	47,047
Home market shipments	77,310	65,638	95,140	67,069	79,900	116,419	111,380
Exports to the United States	280,299	310,173	336,435	250,922	315,035	343,040	343,694
Exports to all other markets	82,939	65,347	91,320	70,900	64,247	82,682	124,680
Export shipments	363,238	375,520	427,754	321,822	379,282	425,722	468,374
Total shipments	440,548	441,158	522,894	388,891	459,182	542,141	579,755

Table continued.

Table VII-21 Continued
Raw honey: Data on the industry in subject countries, by period

Shares and ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021	Projection 2021	Projection 2022
Inventory ratio to procurement	19.3	16.8	12.1	16.1	9.9	11.8	11.6
Inventory ratio to total shipments	18.6	16.8	12.2	17.5	9.8	11.9	11.9
Internal consumption share	9.6	7.4	9.7	8.3	7.9	13.3	11.1
Commercial home market shipments share	8.0	7.5	8.5	8.9	9.5	8.2	8.1
Home market shipments share	17.5	14.9	18.2	17.2	17.4	21.5	19.2
Exports to the United States share	63.6	70.3	64.3	64.5	68.6	63.3	59.3
Exports to all other markets share	18.8	14.8	17.5	18.2	14.0	15.3	21.5
Export shipments share	82.5	85.1	81.8	82.8	82.6	78.5	80.8
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

U.S. inventories of imported merchandise

Table VII-22 presents data on U.S. importers' reported inventories of raw honey. Inventories from all subject sources decreased 16.7 percent from 2018 to 2020 and were 74.8 percent higher in interim 2021 than in interim 2020. As a ratio to imports and U.S. shipments of imports, respectively, inventories from subject sources fell 4.0 percentage points and 4.6 percentage points from 2018-20, and were 4.5 percentage points and 5.7 percentage points higher in interim 2021 than in interim 2020. Inventories from subject sources accounted for between 76.8 and 82.2 percent of all U.S. importers' inventories from 2018-20; in interim 2021, inventories from subject sources accounted for 91.6 percent of all inventories.

Table VII-22
Raw honey: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds; ratios in percent

Measure	Source	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Inventories quantity	Argentina	***	***	***	***	***
Ratio to imports	Argentina	***	***	***	***	***
Ratio to U.S. shipments of imports	Argentina	***	***	***	***	***
Ratio to total shipments of imports	Argentina	***	***	***	***	***
Inventories quantity	Brazil	***	***	***	***	***
Ratio to imports	Brazil	***	***	***	***	***
Ratio to U.S. shipments of imports	Brazil	***	***	***	***	***
Ratio to total shipments of imports	Brazil	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***

Table continued.

Table VII-22 Continued
Raw honey: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds; ratios in percent

Measure	Source	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Inventories quantity	Subject sources	40,379	34,647	33,654	35,204	61,525
Ratio to imports	Subject sources	13.3	10.5	9.3	9.5	14.0
Ratio to U.S. shipments of imports	Subject sources	13.8	10.3	9.3	9.6	15.3
Ratio to total shipments of imports	Subject sources	13.8	10.3	9.3	9.6	15.3
Inventories quantity	Ukraine	***	***	***	***	***
Ratio to imports	Ukraine	***	***	***	***	***
Ratio to U.S. shipments of imports	Ukraine	***	***	***	***	***
Ratio to total shipments of imports	Ukraine	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	12,182	7,491	9,237	7,975	5,620
Ratio to imports	Nonsubject sources	18.0	16.3	19.9	17.6	16.6
Ratio to U.S. shipments of imports	Nonsubject sources	17.4	14.8	20.7	17.9	14.6
Ratio to total shipments of imports	Nonsubject sources	17.4	14.8	20.6	17.9	14.6
Inventories quantity	All import sources	52,561	42,137	42,891	43,179	67,146
Ratio to imports	All import sources	14.1	11.2	10.5	10.4	14.2
Ratio to U.S. shipments of imports	All import sources	14.5	10.9	10.5	10.5	15.3
Ratio to total shipments of imports	All import sources	14.5	10.9	10.5	10.5	15.3

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

U.S. importers' outstanding orders

The Commission requested that importers indicate whether they imported or arranged for the importation of raw honey after September 30, 2021. Their reported data are presented in table VII-23.

Table VII-23
Raw honey: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds

Source	Oct-Dec 2021	Jan-Mar 2022	Apr-Jun 2022	Jul-Sept 2022	Total
Argentina	***	***	***	***	***
Brazil	***	***	***	***	***
India	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	58,037	63,493	22,699	4,455	148,684
Nonsubect sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Antidumping or countervailing duty orders in third-country markets

There are no known trade remedy actions on natural honey classified under HTS subheading 0409.00 from Argentina, Brazil, India, Ukraine, or Vietnam in third-country markets.[14]

Information on nonsubject countries

The top 15 honey producers globally include three subject countries according to data reported by FAO (table VII-24). Vietnam, the remaining subject country, ranked 17th with 45,529 thousand pounds produced in 2020. The top 15 represent 76.6 percent of total global production in 2020 with nonsubject countries in the top 15 accounting for 65.1 percent and subject countries among the top 15 accounting for 11.5 percent of total global production (with Vietnam, subject countries account for 12.8 percent of total global production in 2020).

[14] Natural honey classified under HTS subheading 0409.00 includes all forms of honey and may include raw, processed, and honey packaged for retail sale; thus, this subheading may include product outside the scope of these investigations.

Table VII-24
Raw honey: Leading producing countries, by period, ranked by 2020 production

Quantity in 1,000 pounds

Market	Source	2018	2019	2020
China	Nonsubject	925,621	904,928	944,460
Turkey	Nonsubject	218,497	221,352	210,717
Iran	Nonsubject	156,682	157,866	161,879
Argentina	Subject	160,893	159,629	150,638
Ukraine	Nonsubject	144,313	141,596	137,731
United States	Domestic	141,434	144,111	135,544
Russia	Nonsubject	131,613	128,616	134,370
India	Subject	125,925	125,654	125,794
Mexico	Nonsubject	130,088	125,498	109,664
Brazil	Subject	85,577	92,730	104,284
Canada	Nonsubject	87,239	79,558	76,128
Tanzania	Nonsubject	62,541	63,063	63,583
Spain	Nonsubject	73,684	63,089	61,777
Korea	Nonsubject	53,478	60,220	59,473
New Zealand	Nonsubject	40,492	46,566	54,665
Top 15 Total	NA	2,538,078	2,514,476	2,530,708
Global Total	NA	3,696,974	3,509,935	3,302,152

Source: UN FAO, 2020 the latest available data from FAO Stats.

Note: Data from FAO Stats indicates that Vietnam produced 41,333 thousand pounds, 44,232 thousand pounds, and 43,529 thousand pounds, in 2018, 2019, and 2020, respectively. These were identified in the FAO Stats Database as “official data” meaning they were supplied by governments through national publications and FAO questionnaires. Exports reported in Table VII-25, however, suggest that Vietnamese honey production may be greater than was reported.

The top 15 natural honey exporters include all four subject countries (Table VII-25). The top 15 represent 83.9 percent of total exports reported for 2020 with subject countries among the top 15 accounting for 29.7 percent of total exports and all other countries in the top 15 accounting for 54.2 percent of reported exports in 2020.

Table VII-25
Natural honey: Leading exporting countries ranked by 2020 exports, by period, ranked by 2020 export volume.

Quantity in 1,000 pounds

Market	Source	2018	2019	2020
China	Nonsubject	272,221	266,418	292,045
Ukraine	Nonsubject	109,001	122,949	178,293
Argentina	Subject	139,089	131,039	141,989
Vietnam	Subject	94,291	89,715	122,402
India	Subject	128,361	144,075	120,914
Brazil	Subject	62,885	66,224	100,814
Germany	Nonsubject	50,239	55,823	65,570
Spain	Nonsubject	52,008	50,858	62,669
Poland	Nonsubject	32,419	37,120	54,875
Mexico	Nonsubject	122,741	48,604	49,863
Belgium	Nonsubject	43,733	42,601	49,631
Hungary	Nonsubject	46,148	42,745	43,275
Uruguay	Nonsubject	12,653	17,152	35,129
Romania	Nonsubject	23,169	23,143	29,068
Bulgaria	Nonsubject	23,632	28,550	28,293
Top 15 Total	NA	1,212,591	1,167,016	1,374,827
Global Total	NA	1,497,840	1,413,296	1,638,802

Source: Official exports statistics under HS subheading 0409.00 as reported by various national statistical authorities in the Global Trade Atlas database, accessed February 28, 2022 and official global imports statistics from Vietnam under HS subheading 0409.00 as reported by various national statistical authorities in the Global Trade Atlas database, accessed March 25, 2022.

Notes: These data include natural honey classified under HTS subheading 0409.00 which may include raw, processed, and honey packaged for retail sale; thus, this subheading may include product outside the scope of these investigations. U.S. imports of honey from China are subject to countervailing duty orders and additional Section 301 duties. Exports from Vietnam are mirror data (total imports from Vietnam reported by importing partner countries). Export data reported by Vietnam to the *UN Comtrade Database* were 30,051 thousand pounds, 27,771 thousand pounds, and 29,605 thousand pounds, for 2018, 2019 and 2020, respectively.

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
86 FR 22265, April 27, 2021	*Raw Honey From Argentina, Brazil, India, Ukraine, and Vietnam; Institution of Antidumping Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2021-04-27/pdf/2021-08742.pdf
86 FR 26897, May 11, 2021	*Raw Honey From Argentina, Brazil, India, Ukraine, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2021-05-18/pdf/2021-10440.pdf
86 FR 30980, June 10, 2021	*Raw Honey From Argentina, Brazil, India, Ukraine, and Vietnam*	https://www.govinfo.gov/content/pkg/FR-2021-06-10/pdf/2021-12223.pdf
86 FR 66524, November 23, 2021	*Raw Honey from Ukraine: 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-2021-11-23/pdf/2021-25594.pdf
86 FR 66526, November 23, 2021	*Raw Honey 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-2021-11-23/pdf/2021-25596.pdf
86 FR 66528, November 23, 2021	*Raw Honey from India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2021-11-23/pdf/2021-25593.pdf

Table continued.

Citation	Title	Link
86 FR 66531, November 23, 2021	*Raw Honey From Argentina: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2021-11-23/pdf/2021-25597.pdf
86 FR 66533, November 23, 2021	*Raw Honey From Brazil: 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-2021-11-23/pdf/2021-25592.pdf
86 FR 70144, December 9, 2021	*Raw Honey From Argentina, Brazil, India, Ukraine, and Vietnam; Scheduling of the Final Phase of Anti-Dumping Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2021-12-09/pdf/2021-26688.pdf
87 FR 2127, January 13, 2022	*Raw Honey From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Critical Circumstances in the Less-Than-Fair-Value Investigation*	https://www.govinfo.gov/content/pkg/FR-2022-01-13/pdf/2022-00579.pdf
87 FR 19855, April 06	*Raw Honey From Ukraine: Termination of Less-Than-Fair-Value Investigation*	https://www.govinfo.gov/content/pkg/FR-2022-04-06/pdf/2022-07270.pdf
87 FR 20462, April 07, 2022	*Raw Honey From Ukraine; Termination of Investigation*	https://www.govinfo.gov/content/pkg/FR-2022-04-07/pdf/2022-07351.pdf
87 FR 22179, April 14, 2022	*Raw Honey From Argentina: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2022-04-14/pdf/2022-07995.pdf
87 FR 22182, April 14, 2022	*Raw Honey From Brazil: Final Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2022-04-14/pdf/2022-07996.pdf

Table continued.

Citation	Title	Link
87 FR 22188, April 14, 2022	*Raw Honey From India: Final Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2022-04-14/pdf/2022-07994.pdf
87 FR 22184, April 14, 2022	*Raw Honey From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2022-04-14/pdf/2022-07993.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below are scheduled to appear in the United States International Trade Commission's hearing via videoconference:

Subject: Raw Honey from Argentina, Brazil, India, and Vietnam

Inv. Nos.: 731-TA-1560-1562 and 1564 (Final)

Date and Time: April 12, 2022 - 9:30 a.m.

OPENING REMARKS:	**TIME ALLOCATION:**
Petitioner (**R. Alan Luberda**, Kelley Drye & Warren LLP)	5 minutes
Respondents (**Ron Kendler**, White & Case LLP)	5 minutes

In Support of the Imposition of Antidumping Duty Orders: **TIME ALLOCATION:**

Kelley Drye & Warren LLP — 60 minutes
Washington, DC
on behalf of

American Honey Producers Association
Sioux Honey Association

Chris Hiatt, Owner, Hiatt Honey LLC and President, American Honey Producers Association

Alex Blumenthal, President and Chief Executive Officer, Sioux Honey Association

Ron Spears, President, Mountain Avenue Bees

Matt Halbgewachs, Owner and Manager, Sweet River Company

Craig Rodenberg, Vice President, Honeyland and Northern Bloom Honey

Michael T. Kerwin, Assistant Director, International Trade, Georgetown Economic Services, LLC

In Support of the Imposition of
Antidumping Duty Orders (continued):

Nereus Joubert, Trade Analyst, International Trade, Georgetown Economic Services, LLC

Jacob Jones, Trade Analyst, International Trade, Georgetown Economic Services, LLC

R. Alan Luberda)
Kathleen W. Cannon)
) – OF COUNSEL
Melissa M. Brewer)
Julia Kuelzow)

In Opposition of the Imposition of
Antidumping Duty Orders:

TIME
ALLOCATION:

60 minutes total

Foley & Lardner LLP
Washington, DC
on behalf of

Sweet Harvest Honey

Chris Nubern, Chief Procurement Officer. Sweet Harvest Honey

Gregory Husisian)
) – OF COUNSEL
Jenlain Scott)

White & Case LLP
Washington, DC
on behalf of

National Honey Packers & Dealers Association ("NHPDA")

Melissa Foott, President, American Honey

Brent Barkman, Chief Executive Officer, Barkman Honey, LLC

Eric Wenger, Director of Procurement, Barkman Honey, LLC

In Opposition of the Imposition of
Antidumping Duty Orders (continued):

Maren Martin, President, The Impex Group, Inc.

Sarah Neves, Operation Manager, The Impex Group, Inc.

Marie Jose Karam, Vice President and General Manager, Odem International Inc.

Normand Bernier, Senior Adviser (and former President), Odem International Inc.

Nick Sargeantson, President, Sunland Trading, Inc.

Andrew Sargeantson, Director, Sunland Trading, Inc.

Chris Nubern, Chief Procurement Officer, Sweet Harvest Foods

Gregory J. Spak)
Jay. C. Campbell)
) – OF COUNSEL
Ron Kendler)
C. Alex Dilley)

Faegre Drinker Biddle & Reath LLP
Washington, DC
on behalf of

Bimbo Bakeries USA Inc. ("Bimbo Bakeries")
General Mills Operations LLC ("General Mills")
Post Holdings, Inc. ("Post")
Smithfield Foods, Inc. ("Smithfield")

Sabra Bertrand, Senior Director of Procurement - Ingredients, Bimbo Bakeries

Craig Pizer, Vice President & General Counsel, Bimbo Bakeries

Brent Bash, Director - Sourcing Grains (North America), General Mills

Drew Felz, Government Affairs Representative, General Mills

Thomas Crown, Director of Procurement, Ingredients, Post

In Opposition of the Imposition of
Antidumping Duty Orders (continued):

Jill Bollettieri, Senior Vice President, General Counsel & External Relations, Post

Randy Haines, Chief Procurement Officer, Smithfield

Jim Monroe, Vice President, Corporate Affairs, Smithfield

Peter Tabor, Senior Policy Advisor, Holland & Knight LLP

Zachary Decker, Government Relations Manager, American Bakers Association

Douglas J. Heffner)
Richard P. Ferrin) – OF COUNSEL
Carrie B. Connolly)

REBUTTAL/CLOSING REMARKS:

Petitioners (**Kathleen W. Cannon**, Kelley Drye & Warrren LLP)
5 minutes + time remaining from direct

Respondents (**Jay C. Campbell**, White & Case LLP; **Richard Ferrin**, Faegre Drinker Biddle & Reath LLP; and **Gregory Husisian**, Foley & Lardner LLP)
5 minutes + time remaining from direct

-END-

APPENDIX C

SUMMARY DATA

All U.S. producers

Table C-1
Raw honey: Summary data concerning the U.S. market, by period
Quantity=1,000 pounds; Value=1,000 dollars; Yield=pounds per colony; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
	2018	2019	2020	2020	2021	2018-20	2018-19	2019-20	2020-21
U.S. consumption quantity:									
Amount	547,387	531,194	556,986	398,979	459,587	▲1.8	▼(3.0)	▲4.9	▲15.2
Producers' share (fn1)	27.5	28.8	25.4	20.6	15.4	▼(2.1)	▲1.3	▼(3.4)	▼(5.3)
Importers' share (fn1):									
Argentina	14.6	14.7	15.2	16.5	17.1	▲0.7	▲0.1	▲0.5	▲0.6
Brazil	9.5	9.9	13.5	14.8	14.1	▲4.0	▲0.4	▲3.6	▼(0.7)
India	17.6	20.1	14.4	15.8	23.0	▼(3.2)	▲2.5	▼(5.8)	▲7.2
Vietnam	15.2	15.3	20.0	20.3	21.6	▲4.8	▲0.1	▲4.6	▲1.3
Subject sources	56.9	60.1	63.1	67.5	75.9	▲6.2	▲3.2	▲3.0	▲8.4
Canada	5.9	3.1	1.5	1.7	0.9	▼(4.3)	▼(2.8)	▼(1.5)	▼(0.9)
Ukraine	3.3	3.6	4.3	4.2	2.8	▲1.0	▲0.3	▲0.8	▼(1.4)
All other sources	6.4	4.4	5.5	6.0	5.0	▼(0.8)	▼(2.0)	▲1.1	▼(1.0)
Nonsubject sources	15.6	11.1	11.4	11.9	8.7	▼(4.1)	▼(4.5)	▲0.4	▼(3.2)
All import sources	72.5	71.2	74.6	79.4	84.6	▲2.1	▼(1.3)	▲3.4	▲5.3
U.S. consumption value:									
Amount	772,997	674,471	690,092	468,236	680,379	▼(10.7)	▼(12.7)	▲2.3	▲45.3
Producers' share (fn1)	43.4	45.5	43.7	37.4	26.8	▲0.3	▲2.2	▼(1.8)	▼(10.7)
Importers' share (fn1):									
Argentina	11.6	12.0	13.6	15.1	18.8	▲2.1	▲0.5	▲1.6	▲3.6
Brazil	10.6	8.6	10.6	11.7	15.3	▲0.0	▼(2.0)	▲2.0	▲3.6
India	10.5	12.5	8.7	10.1	15.4	▼(1.8)	▲2.0	▼(3.8)	▲5.3
Vietnam	7.5	7.8	9.9	10.6	11.8	▲2.4	▲0.3	▲2.1	▲1.2
Subject sources	40.2	40.9	42.8	47.4	61.2	▲2.6	▲0.7	▲1.9	▲13.7
Canada	5.9	3.5	1.9	2.1	1.1	▼(4.0)	▼(2.5)	▼(1.6)	▼(1.1)
Ukraine	2.2	2.6	2.9	2.9	2.0	▲0.7	▲0.4	▲0.3	▼(1.0)
All other sources	8.3	7.5	8.7	10.0	9.0	▲0.4	▼(0.9)	▲1.2	▼(1.0)
Nonsubject sources	16.4	13.5	13.5	15.1	12.0	▼(3.0)	▼(2.9)	▼(0.0)	▼(3.1)
All import sources	56.6	54.5	56.3	62.6	73.2	▼(0.3)	▼(2.2)	▲1.8	▲10.7
Adjusted U.S. imports from (fn2):									
Argentina:									
Quantity	79,839	78,083	84,935	65,788	78,703	▲6.4	▼(2.2)	▲8.8	▲19.6
Value	89,457	81,194	94,106	70,852	127,592	▲5.2	▼(9.2)	▲15.9	▲80.1
Unit value	$1.12	$1.04	$1.11	$1.08	$1.62	▼(1.1)	▼(7.2)	▲6.6	▲50.5
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Brazil:									
Quantity	52,009	52,693	75,371	59,068	64,776	▲44.9	▲1.3	▲43.0	▲9.7
Value	81,982	58,128	73,220	54,657	103,908	▼(10.7)	▼(29.1)	▲26.0	▲90.1
Unit value	$1.58	$1.10	$0.97	$0.93	$1.60	▼(38.4)	▼(30.0)	▼(11.9)	▲73.4
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
India:									
Quantity	96,215	106,910	79,997	63,231	105,902	▼(16.9)	▲11.1	▼(25.2)	▲67.5
Value	81,011	84,015	59,877	47,129	104,878	▼(26.1)	▲3.7	▼(28.7)	▲122.5
Unit value	$0.84	$0.79	$0.75	$0.75	$0.99	▼(11.1)	▼(6.7)	▼(4.8)	▲32.9
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Vietnam:									
Quantity	83,335	81,526	111,356	81,063	99,475	▲33.6	▼(2.2)	▲36.6	▲22.7
Value	58,289	52,830	68,358	49,519	79,950	▲17.3	▼(9.4)	▲29.4	▲61.5
Unit value	$0.70	$0.65	$0.61	$0.61	$0.80	▼(12.2)	▼(7.4)	▼(5.3)	▲31.6
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources:									
Quantity	311,397	319,212	351,660	269,150	348,856	▲12.9	▲2.5	▲10.2	▲29.6
Value	310,738	276,168	295,562	222,157	416,328	▼(4.9)	▼(11.1)	▲7.0	▲87.4
Unit value	$1.00	$0.87	$0.84	$0.83	$1.19	▼(15.8)	▼(13.3)	▼(2.9)	▲44.6
Ending inventory quantity	40,379	34,647	33,654	35,204	61,525	▼(16.7)	▼(14.2)	▼(2.9)	▲74.8

Table continued.

Table C-1 Continued
Raw honey: Summary data concerning the U.S. market, by period
Quantity=1,000 pounds; Value=1,000 dollars; Yield=pounds per colony; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
	2018	2019	2020	2020	2021	2018-20	2018-19	2019-20	2020-21
Adjusted U.S. imports from (fn2): Continued									
Canada:									
Quantity	32,142	16,333	8,614	6,891	3,971	▼(73.2)	▼(49.2)	▼(47.3)	▼(42.4)
Value	45,656	23,275	12,873	10,018	7,345	▼(71.8)	▼(49.0)	▼(44.7)	▼(26.7)
Unit value	$1.42	$1.42	$1.49	$1.45	$1.85	▲5.2	▲0.3	▲4.9	▲27.2
Ukraine:									
Quantity	18,168	19,051	24,161	16,652	12,883	▲33.0	▲4.9	▲26.8	▼(22.6)
Value	17,067	17,381	20,139	13,799	13,296	▲18.0	▲1.8	▲15.9	▼(3.6)
Unit value	$0.94	$0.91	$0.83	$0.83	$1.03	▼(11.3)	▼(2.9)	▼(8.6)	▲24.5
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources:									
Quantity	34,902	23,375	30,857	23,929	23,146	▼(11.6)	▼(33.0)	▲32.0	▼(3.3)
Value	64,403	50,456	59,925	46,967	61,172	▼(7.0)	▼(21.7)	▲18.8	▲30.2
Unit value	$1.85	$2.16	$1.94	$1.96	$2.64	▲5.2	▲17.0	▼(10.0)	▲34.7
Nonsubject sources:									
Quantity	85,212	58,760	63,633	47,473	40,000	▼(25.3)	▼(31.0)	▲8.3	▼(15.7)
Value	127,125	91,112	92,938	70,784	81,814	▼(26.9)	▼(28.3)	▲2.0	▲15.6
Unit value	$1.49	$1.55	$1.46	$1.49	$2.05	▼(2.1)	▲3.9	▼(5.8)	▲37.2
Ending inventory quantity	12,182	7,491	9,237	7,975	5,620	▼(24.2)	▼(38.5)	▲23.3	▼(29.5)
All import sources:									
Quantity	396,609	377,972	415,292	316,622	388,856	▲4.7	▼(4.7)	▲9.9	▲22.8
Value	437,863	367,279	388,500	292,941	498,141	▼(11.3)	▼(16.1)	▲5.8	▲70.0
Unit value	$1.10	$0.97	$0.94	$0.93	$1.28	▼(15.3)	▼(12.0)	▼(3.7)	▲38.5
Ending inventory quantity	52,561	42,137	42,891	43,179	67,146	▼(18.4)	▼(19.8)	▲1.8	▲55.5
U.S. producers' data based on third-party data sources:									
Production quantity (fn3)	154,008	156,922	147,594	147,594	126,466	▼(4.2)	▲1.9	▼(5.9)	▼(14.3)
Production yield (fn3)	54.5	55.8	54.5	54.5	46.9	▲0.1	▲1.3	▼(1.3)	▼(7.6)
U.S. shipments (fn4):									
Quantity	150,778	153,222	141,694	82,357	70,732	▼(6.0)	▲1.6	▼(7.5)	▼(14.1)
Value	335,134	307,192	301,592	175,295	182,237	▼(10.0)	▼(8.3)	▼(1.8)	▲4.0
Unit value	$2.22	$2.00	$2.13	$2.13	$2.58	▼(4.2)	▼(9.8)	▲6.2	▲21.0
Export shipments:									
Quantity	3,230	3,700	5,900	3,966	3,494	▲82.7	▲14.5	▲59.5	▼(11.9)
Value	5,224	5,083	8,355	5,578	5,560	▲59.9	▼(2.7)	▲64.4	▼(0.3)
Unit value	$1.62	$1.37	$1.42	$1.41	$1.59	▼(12.4)	▼(15.1)	▲3.1	▲13.2
U.S. producers' data based on Commission questionnaires:									
Large U.S. producers':									
Ending inventory quantity	7,740	14,779	19,335	22,238	15,233	▲149.8	▲90.9	▲30.8	▼(31.5)
Inventories/U.S. shipments (fn1)	22.0	42.9	51.2	56.2	34.2	▲29.2	▲20.9	▲8.3	▼(22.0)
Production workers	1,112	1,168	1,165	1,154	1,132	▲4.8	▲5.0	▼(0.3)	▼(1.9)
Hours worked (1,000s)	1,928	2,003	2,005	1,621	1,598	▲4.0	▲3.9	▲0.1	▼(1.4)
Wages paid ($1,000)	37,865	39,547	42,264	31,344	30,899	▲11.6	▲4.4	▲6.9	▼(1.4)
Hourly wages (dollars per hour)	$19.64	$19.74	$21.08	$19.34	$19.34	▲7.3	▲0.5	▲6.8	▼(0.0)
Productivity (pounds per hour)	20.4	21.1	20.8	23.3	18.7	▲1.7	▲3.1	▼(1.3)	▼(19.9)
Unit labor costs	$0.96	$0.94	$1.01	$0.83	$1.03	▲5.5	▼(2.5)	▲8.2	▲24.8
All U.S. producers':									
Ending inventory quantity	8,012	15,109	19,728	fn5	fn5	▲146.2	▲88.6	▲30.6	fn5
Inventories/U.S. shipments (fn1)	20.4	38.6	47.3	fn5	fn5	▲26.9	▲18.1	▲8.7	fn5
Production workers	1,293	1,358	1,360	fn5	fn5	▲5.2	▲5.0	▲0.1	fn5
Hours worked (1,000s)	2,196	2,299	2,299	fn5	fn5	▲4.7	▲4.7	▲0.0	fn5
Wages paid ($1,000)	43,114	45,379	48,456	fn5	fn5	▲12.4	▲5.3	▲6.8	fn5
Hourly wages (dollars per hour)	$19.64	$19.74	$21.07	fn5	fn5	▲7.3	▲0.5	▲6.8	fn5
Productivity (pounds per hour)	20.0	20.7	20.0	fn5	fn5	▲0.3	▲3.5	▼(3.1)	fn5
Unit labor costs	$0.98	$0.95	$1.05	fn5	fn5	▲7.0	▼(2.9)	▲10.2	fn5

Table continued.

Table C-1 Continued

Raw honey: Summary data concerning the U.S. market, by period

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

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
	2018	2019	2020	2020	2021	2018-20	2018-19	2019-20	2020-21
Large U.S. producers':									
Net sales:									
Quantity	34,017	33,185	36,320	28,610	32,090	▲6.8	▼(2.4)	▲9.4	▲12.2
Value	60,487	51,832	58,296	44,610	53,976	▼(3.6)	▼(14.3)	▲12.5	▲21.0
Unit value	$1.78	$1.56	$1.61	$1.56	$1.68	▼(9.7)	▼(12.2)	▲2.8	▲7.9
Operating expenses	71,098	69,949	69,559	52,907	55,546	▼(2.2)	▼(1.6)	▼(0.6)	▲5.0
Operating income or (loss) (fn6)	(10,611)	(18,117)	(11,263)	(8,296)	(1,570)	▼fn6	▼fn6	▲fn6	▲fn6
Net income or (loss) (fn6)	(8,699)	(17,901)	(6,028)	(4,924)	104	▲fn6	▼fn6	▲fn6	▲fn6
Unit operating expenses	$2.09	$2.11	$1.92	$1.85	$1.73	▼(8.4)	▲0.8	▼(9.1)	▼(6.4)
Unit operating income or (loss) (fn6)	$(0.31)	$(0.55)	$(0.31)	$(0.29)	$(0.05)	▲fn6	▼fn6	▲fn6	▲fn6
Unit net income or (loss) (fn6)	$(0.26)	$(0.54)	$(0.17)	$(0.17)	$0.00	▲fn6	▼fn6	▲fn6	▲fn6
Operating expenses/sales (fn1)	117.5	135.0	119.3	118.6	102.9	▲1.8	▲17.4	▼(15.6)	▼(15.7)
Operating income or (loss)/sales (fn1)	(17.5)	(35.0)	(19.3)	(18.6)	(2.9)	▼(1.8)	▼(17.4)	▲15.6	▲15.7
Net income or (loss)/sales (fn1)	(14.4)	(34.5)	(10.3)	(11.0)	0.2	▲4.0	▼(20.2)	▲24.2	▲11.2
Capital expenditures	14,923	15,725	12,059	7,791	6,071	▼(19.2)	▲5.4	▼(23.3)	▼(22.1)
Research and development expenses	***	***	***	***	***	▼***	▼***	▲***	▲***
Net assets	152,912	156,425	168,154	NA	NA	▲10.0	▲2.3	▲7.5	NA
All U.S. producers':									
Net sales:									
Quantity	38,425	38,348	40,897	fn5	fn5	▲6.4	▼(0.2)	▲6.6	fn5
Value	68,583	60,439	65,513	fn5	fn5	▼(4.5)	▼(11.9)	▲8.4	fn5
Unit value	$1.78	$1.58	$1.60	fn5	fn5	▼(10.3)	▼(11.7)	▲1.6	fn5
Operating expenses	79,354	77,842	77,195	fn5	fn5	▼(2.7)	▼(1.9)	▼(0.8)	fn5
Operating income or (loss) (fn6)	(10,771)	(17,404)	(11,682)	fn5	fn5	▼fn6	▼fn6	▲fn6	fn5
Net income or (loss) (fn6)	(8,411)	(16,938)	(5,684)	fn5	fn5	▲fn6	▼fn6	▲fn6	fn5
Unit operating expenses	$2.07	$2.03	$1.89	fn5	fn5	▼(8.6)	▼(1.7)	▼(7.0)	fn5
Unit operating income or (loss) (fn6)	$(0.28)	$(0.45)	$(0.29)	fn5	fn5	▼fn6	▼fn6	▲fn6	fn5
Unit net income or (loss) (fn6)	$(0.22)	$(0.44)	$(0.14)	fn5	fn5	▲fn6	▼fn6	▲fn6	fn5
Operating expenses/sales (fn1)	115.7	128.8	117.8	fn5	fn5	▲2.1	▲13.1	▼(11.0)	fn5
Operating income or (loss)/sales (fn1)	(15.7)	(28.8)	(17.8)	fn5	fn5	▼(2.1)	▼(13.1)	▲11.0	fn5
Net income or (loss)/sales (fn1)	(12.3)	(28.0)	(8.7)	fn5	fn5	▲3.6	▼(15.8)	▲19.3	fn5

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.

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

fn2.--Imports data were adjusted to remove re-exports as reported in official U.S. export statistics of the U.S. Department of Commerce. See Part IV for more detail.

fn3.--Domestic production and yield interim period data are the annual data for each period as reported by NASS.

fn4.--U.S. shipments are NASS production adjusted to remove domestic exports as reported in official U.S. export statistics of the U.S Department of Commerce. Interim period derived using full year NASS data adjusted for January to September using monthly shipments data from questionnaire responses to the prelimary investigation. See part III for more detail.

fn5.--Interim period not shown for all producers as Commission questionnaire did not collect interim data for small raw honey producers.

fn6.--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.

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022, from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022, and from data submitted in response to Commission questionnaires. U.S. import statistics are based on imports for consumption and associated values are reported on a landed duty paid value basis.

Related party exclusion

Table C-2
Raw honey: Summary data concerning the U.S. market excluding two U.S. producers *, by period**
Quantity=1,000 pounds; Value=1,000 dollars; Yield=pounds per colony; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
	2018	2019	2020	2020	2021	2018-20	2018-19	2019-20	2020-21
U.S. consumption quantity:									
Amount	547,387	531,194	556,986	398,979	459,587	▲1.8	▼(3.0)	▲4.9	▲15.2
Producers' share (fn1):									
Included producers	***	***	***	***	***	▼***	▲***	▼***	▼***
Excluded producers	***	***	***	***	***	▲***	▼***	▲***	▲***
All producers	27.5	28.8	25.4	20.6	15.4	▼(2.1)	▲1.3	▼(3.4)	▼(5.3)
Importers' share (fn1):									
Argentina	14.6	14.7	15.2	16.5	17.1	▲0.7	▲0.1	▲0.5	▲0.6
Brazil	9.5	9.9	13.5	14.8	14.1	▲4.0	▲0.4	▲3.6	▼(0.7)
India	17.6	20.1	14.4	15.8	23.0	▼(3.2)	▲2.5	▼(5.8)	▲7.2
Vietnam	15.2	15.3	20.0	20.3	21.6	▲4.8	▲0.1	▲4.6	▲1.3
Subject sources	56.9	60.1	63.1	67.5	75.9	▲6.2	▲3.2	▲3.0	▲8.4
Canada	5.9	3.1	1.5	1.7	0.9	▼(4.3)	▼(2.8)	▼(1.5)	▼(0.9)
Ukraine	3.3	3.6	4.3	4.2	2.8	▲1.0	▲0.3	▲0.8	▼(1.4)
All other sources	6.4	4.4	5.5	6.0	5.0	▼(0.8)	▼(2.0)	▲1.1	▼(1.0)
Nonsubject sources	15.6	11.1	11.4	11.9	8.7	▼(4.1)	▼(4.5)	▲0.4	▼(3.2)
All import sources	72.5	71.2	74.6	79.4	84.6	▲2.1	▼(1.3)	▲3.4	▲5.3
U.S. consumption value:									
Amount	772,997	674,471	690,092	468,236	680,379	▼(10.7)	▼(12.7)	▲2.3	▲45.3
Producers' share (fn1):									
Included producers	***	***	***	***	***	▲***	▲***	▼***	▼***
Excluded producers	***	***	***	***	***	▲***	▼***	▲***	▼***
All producers	43.4	45.5	43.7	37.4	26.8	▲0.3	▲2.2	▼(1.8)	▼(10.7)
Importers' share (fn1):									
Argentina	11.6	12.0	13.6	15.1	18.8	▲2.1	▲0.5	▲1.6	▲3.6
Brazil	10.6	8.6	10.6	11.7	15.3	▲0.0	▼(2.0)	▲2.0	▲3.6
India	10.5	12.5	8.7	10.1	15.4	▼(1.8)	▲2.0	▼(3.8)	▲5.3
Vietnam	7.5	7.8	9.9	10.6	11.8	▲2.4	▲0.3	▲2.1	▲1.2
Subject sources	40.2	40.9	42.8	47.4	61.2	▲2.6	▲0.7	▲1.9	▲13.7
Canada	5.9	3.5	1.9	2.1	1.1	▼(4.0)	▼(2.5)	▼(1.6)	▼(1.1)
Ukraine	2.2	2.6	2.9	2.9	2.0	▲0.7	▲0.4	▲0.3	▼(1.0)
All other sources	8.3	7.5	8.7	10.0	9.0	▲0.4	▼(0.9)	▲1.2	▼(1.0)
Nonsubject sources	16.4	13.5	13.5	15.1	12.0	▼(3.0)	▼(2.9)	▼(0.0)	▼(3.1)
All import sources	56.6	54.5	56.3	62.6	73.2	▼(0.3)	▼(2.2)	▲1.8	▲10.7
Adjusted U.S. imports from (fn2):									
Argentina:									
Quantity	79,839	78,083	84,935	65,788	78,703	▲6.4	▼(2.2)	▲8.8	▲19.6
Value	89,457	81,194	94,106	70,852	127,592	▲5.2	▼(9.2)	▲15.9	▲80.1
Unit value	$1.12	$1.04	$1.11	$1.08	$1.62	▼(1.1)	▼(7.2)	▲6.6	▲50.5
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Brazil:									
Quantity	52,009	52,693	75,371	59,068	64,776	▲44.9	▲1.3	▲43.0	▲9.7
Value	81,982	58,128	73,220	54,657	103,908	▼(10.7)	▼(29.1)	▲26.0	▲90.1
Unit value	$1.58	$1.10	$0.97	$0.93	$1.60	▼(38.4)	▼(30.0)	▼(11.9)	▲73.4
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
India:									
Quantity	96,215	106,910	79,997	63,231	105,902	▼(16.9)	▲11.1	▼(25.2)	▲67.5
Value	81,011	84,015	59,877	47,129	104,878	▼(26.1)	▲3.7	▼(28.7)	▲122.5
Unit value	$0.84	$0.79	$0.75	$0.75	$0.99	▼(11.1)	▼(6.7)	▼(4.8)	▲32.9
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Vietnam:									
Quantity	83,335	81,526	111,356	81,063	99,475	▲33.6	▼(2.2)	▲36.6	▲22.7
Value	58,289	52,830	68,358	49,519	79,950	▲17.3	▼(9.4)	▲29.4	▲61.5
Unit value	$0.70	$0.65	$0.61	$0.61	$0.80	▼(12.2)	▼(7.4)	▼(5.3)	▲31.6
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources:									
Quantity	311,397	319,212	351,660	269,150	348,856	▲12.9	▲2.5	▲10.2	▲29.6
Value	310,738	276,168	295,562	222,157	416,328	▼(4.9)	▼(11.1)	▲7.0	▲87.4
Unit value	$1.00	$0.87	$0.84	$0.83	$1.19	▼(15.8)	▼(13.3)	▼(2.9)	▲44.6
Ending inventory quantity	40,379	34,647	33,654	35,204	61,525	▼(16.7)	▼(14.2)	▼(2.9)	▲74.8

Table continued.

Table C-2 Continued

Raw honey: Summary data concerning the U.S. market excluding two U.S. producers *, by period**

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

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
	2018	2019	2020	2020	2021	2018-20	2018-19	2019-20	2020-21
Adjusted U.S. imports from (fn2): Continued									
Canada:									
Quantity	32,142	16,333	8,614	6,891	3,971	▼(73.2)	▼(49.2)	▼(47.3)	▼(42.4)
Value	45,656	23,275	12,873	10,018	7,345	▼(71.8)	▼(49.0)	▼(44.7)	▼(26.7)
Unit value	$1.42	$1.42	$1.49	$1.45	$1.85	▲5.2	▲0.3	▲4.9	▲27.2
Ukraine:									
Quantity	18,168	19,051	24,161	16,652	12,883	▲33.0	▲4.9	▲26.8	▼(22.6)
Value	17,067	17,381	20,139	13,799	13,296	▲18.0	▲1.8	▲15.9	▼(3.6)
Unit value	$0.94	$0.91	$0.83	$0.83	$1.03	▼(11.3)	▼(2.9)	▼(8.6)	▲24.5
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources:									
Quantity	34,902	23,375	30,857	23,929	23,146	▼(11.6)	▼(33.0)	▲32.0	▼(3.3)
Value	64,403	50,456	59,925	46,967	61,172	▼(7.0)	▼(21.7)	▲18.8	▲30.2
Unit value	$1.85	$2.16	$1.94	$1.96	$2.64	▲5.2	▲17.0	▼(10.0)	▲34.7
Nonsubject sources:									
Quantity	85,212	58,760	63,633	47,473	40,000	▼(25.3)	▼(31.0)	▲8.3	▼(15.7)
Value	127,125	91,112	92,938	70,784	81,814	▼(26.9)	▼(28.3)	▲2.0	▲15.6
Unit value	$1.49	$1.55	$1.46	$1.49	$2.05	▼(2.1)	▲3.9	▼(5.8)	▲37.2
Ending inventory quantity	12,182	7,491	9,237	7,975	5,620	▼(24.2)	▼(38.5)	▲23.3	▼(29.5)
All import sources:									
Quantity	396,609	377,972	415,292	316,622	388,856	▲4.7	▼(4.7)	▲9.9	▲22.8
Value	437,863	367,279	388,500	292,941	498,141	▼(11.3)	▼(16.1)	▲5.8	▲70.0
Unit value	$1.10	$0.97	$0.94	$0.93	$1.28	▼(15.3)	▼(12.0)	▼(3.7)	▲38.5
Ending inventory quantity	52,561	42,137	42,891	43,179	67,146	▼(18.4)	▼(19.8)	▲1.8	▲55.5
Included U.S. producers' data based on third-party data sources:									
Production quantity (fn3)	***	***	***	***	***	▼***	▲***	▼***	▼(14.4)
Production yield (fn3)	***	***	***	***	***	▲***	▲***	▼***	▼(7.6)
U.S. shipments (fn4):									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Included U.S. producers' data based on Commission questionnaires:									
Large U.S. producers':									
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Inventories/U.S. shipments (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
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':									
Ending inventory quantity	***	***	***	fn5	fn5	▲***	▲***	▲***	fn5
Inventories/U.S. shipments (fn1)	***	***	***	fn5	fn5	▲***	▲***	▲***	fn5
Production workers	***	***	***	fn5	fn5	▲***	▲***	▲***	fn5
Hours worked (1,000s)	***	***	***	fn5	fn5	▲***	▲***	▼***	fn5
Wages paid ($1,000)	***	***	***	fn5	fn5	▲***	▲***	▲***	fn5
Hourly wages (dollars per hour)	***	***	***	fn5	fn5	▲***	▲***	▲***	fn5
Productivity (pounds per hour)	***	***	***	fn5	fn5	▼***	▲***	▼***	fn5
Unit labor costs	***	***	***	fn5	fn5	▲***	▼***	▲***	fn5

Table continued.

Table C-2 Continued

Raw honey: Summary data concerning the U.S. market excluding two U.S. producers *, by period**

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

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
	2018	2019	2020	2020	2021	2018-20	2018-19	2019-20	2020-21
Included Large U.S. producers':									
Net sales:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Operating expenses	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss) (fn6)	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn6)	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit operating expenses	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit operating income or (loss) (fn6)	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn6)	***	***	***	***	***	▲***	▼***	▲***	▲***
Operating expenses/sales (fn1)	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Capital expenditures	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses	***	***	***	***	***	▼***	▼***	▲***	▲***
Net assets	***	***	***	***	***	▲***	▲***	▲***	***
Included All U.S. producers':									
Net sales:									
Quantity	***	***	***	fn5	fn5	▲***	▲***	▲***	fn5
Value	***	***	***	fn5	fn5	▼***	▼***	▲***	fn5
Unit value	***	***	***	fn5	fn5	▼***	▼***	▲***	fn5
Operating expenses	***	***	***	fn5	fn5	▼***	▼***	▼***	fn5
Operating income or (loss) (fn6)	***	***	***	fn5	fn5	▼***	▼***	▲***	fn5
Net income or (loss) (fn6)	***	***	***	fn5	fn5	▲***	▼***	▲***	fn5
Unit operating expenses	***	***	***	fn5	fn5	▼***	▼***	▼***	fn5
Unit operating income or (loss) (fn6)	***	***	***	fn5	fn5	▼***	▼***	▲***	fn5
Unit net income or (loss) (fn6)	***	***	***	fn5	fn5	▲***	▼***	▲***	fn5
Operating expenses/sales (fn1)	***	***	***	fn5	fn5	▲***	▲***	▼***	fn5
Operating income or (loss)/sales (fn1)	***	***	***	fn5	fn5	▼***	▼***	▲***	fn5
Net income or (loss)/sales (fn1)	***	***	***	fn5	fn5	▲***	▼***	▲***	fn5

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.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Imports data were adjusted to remove re-exports as reported in official U.S. export statistics of the U.S. Department of Commerce. See Part IV for more detail.
fn3.--Domestic production and yield interim period data are the annual data for each period as reported by NASS.
fn4.--U.S. shipments are NASS production adjusted to remove domestic exports as reported in official U.S. export statistics of the U.S Department of Commerce. Interim period derived using full year NASS data adjusted for January to September using monthly shipments data from questionnaire responses to the prelimary investigation. See part III for more detail.
fn5.--Interim period not shown for all producers as Commission questionnaire did not collect interim data for small raw honey producers.
fn6.--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.

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022, from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022, and from data submitted in response to Commission questionnaires. U.S. import statistics are based on imports for consumption and associated values are reported on a landed duty paid value basis.

APPENDIX D

QUESTIONNAIRE RESPONSES REGARDING THE DOMESTIC LIKE PRODUCT

Table D-1

Raw honey: Count of firms' responses to the six factors comparing raw honey not packaged for retail sale to raw honey packaged for retail sale

Count in number of firms

Item	Firm type	Fully	Mostly	Somewhat	Never
Physical characteristics	U.S. producers	9	6	13	44
Interchangeability	U.S. producers	6	3	10	50
Channels	U.S. producers	2	3	10	54
Manufacturing	U.S. producers	4	4	10	51
Perceptions	U.S. producers	5	3	12	50
Price	U.S. producers	1	4	8	55
Physical characteristics	U.S. importers	8	4	2	1
Interchangeability	U.S. importers	9	2	2	1
Channels	U.S. importers	3	4	4	0
Manufacturing	U.S. importers	1	8	4	0
Perceptions	U.S. importers	5	2	3	1
Price	U.S. importers	2	7	3	1
Physical characteristics	U.S. purchasers	5	2	2	1
Interchangeability	U.S. purchasers	3	4	2	1
Channels	U.S. purchasers	0	3	6	2
Manufacturing	U.S. purchasers	1	4	5	1
Perceptions	U.S. purchasers	2	3	3	2
Price	U.S. purchasers	2	1	5	2

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

Table D-2

Raw honey: U.S producers' narrative responses to the six-factor like product factors comparing raw honey not packaged for retail sale to raw honey packaged for retail sale

Item	Narrative
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***

Item	Narrative
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	***

Item	Narrative
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
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Interchangeability	***
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Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Item	Narrative
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
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Item	Narrative
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
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Item	Narrative
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
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Perceptions	***

Item	Narrative
Price	***
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Price	***

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

Table D-3

Raw honey: U.S importers' narrative responses to the six-factor like product factors comparing raw honey not packaged for retail sale to raw honey packaged for retail sale

Item	Narrative
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	***

Item	Narrative
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
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Interchangeability	***
Interchangeability	***
Interchangeability	***

Item	Narrative
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***

Item	Narrative
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
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Manufacturing	***

Item	Narrative
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
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Perceptions	***

Item	Narrative
Price	***
Price	***
Price	***
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Price	***
Price	***
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Price	***

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

Table D-4

Raw honey: U.S purchasers' narrative responses to the six-factor like product factors comparing raw honey not packaged for retail sale to raw honey packaged for retail sale

Item	Narrative
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***

Item	Narrative
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Item	Narrative
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
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Channels	***
Channels	***
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Channels	***

Item	Narrative
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Item	Narrative
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***

Item	Narrative
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

APPENDIX E

U.S. SHIPMENTS BY COLOR

Table E-1
Raw honey: Large U.S. producers' U.S. shipments, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	18,093	19,093	20,926	16,526	19,156
Extra light amber	Quantity	8,971	7,689	8,604	6,866	8,311
Light amber	Quantity	6,854	6,832	6,671	5,326	4,996
Amber or darker	Quantity	681	624	790	492	359
All honey colors	Quantity	34,599	34,238	36,992	29,210	32,822
White or lighter	Value	31,754	29,966	33,286	26,435	32,347
Extra light amber	Value	16,795	12,670	13,393	10,347	14,629
Light amber	Value	11,845	10,507	10,657	8,643	9,777
Amber or darker	Value	1,091	782	1,089	690	704
All honey colors	Value	61,485	53,924	58,425	46,115	57,457
White or lighter	Unit value	1.76	1.57	1.59	1.60	1.69
Extra light amber	Unit value	1.87	1.65	1.56	1.51	1.76
Light amber	Unit value	1.73	1.54	1.60	1.62	1.96
Amber or darker	Unit value	1.60	1.25	1.38	1.40	1.96
All honey colors	Unit value	1.78	1.57	1.58	1.58	1.75
White or lighter	Share of quantity	52.3	55.8	56.6	56.6	58.4
Extra light amber	Share of quantity	25.9	22.5	23.3	23.5	25.3
Light amber	Share of quantity	19.8	20.0	18.0	18.2	15.2
Amber or darker	Share of quantity	2.0	1.8	2.1	1.7	1.1
All honey colors	Share of quantity	100.0	100.0	100.0	100.0	100.0
White or lighter	Share of value	51.6	55.6	57.0	57.3	56.3
Extra light amber	Share of value	27.3	23.5	22.9	22.4	25.5
Light amber	Share of value	19.3	19.5	18.2	18.7	17.0
Amber or darker	Share of value	1.8	1.5	1.9	1.5	1.2
All honey colors	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table E-2
Raw honey: U.S. importers' U.S. shipments of imports from Argentina, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-3
Raw honey: U.S. importers' U.S. shipments of imports from Brazil, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-4
Raw honey: U.S. importers' U.S. shipments of imports from India, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-5
Raw honey: U.S. importers' U.S. shipments of imports from Vietnam, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-6
Raw honey: U.S. importers' U.S. shipments of imports from subject sources, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-7
Raw honey: U.S. importers' U.S. shipments of imports from nonsubject sources, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-8
Raw honey: U.S. importers' U.S. shipments of imports from all import sources, by color and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Honey color	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
White or lighter	Quantity	***	***	***	***	***
Extra light amber	Quantity	***	***	***	***	***
Light amber	Quantity	***	***	***	***	***
Amber or darker	Quantity	***	***	***	***	***
All honey colors	Quantity	***	***	***	***	***
White or lighter	Value	***	***	***	***	***
Extra light amber	Value	***	***	***	***	***
Light amber	Value	***	***	***	***	***
Amber or darker	Value	***	***	***	***	***
All honey colors	Value	***	***	***	***	***
White or lighter	Unit value	***	***	***	***	***
Extra light amber	Unit value	***	***	***	***	***
Light amber	Unit value	***	***	***	***	***
Amber or darker	Unit value	***	***	***	***	***
All honey colors	Unit value	***	***	***	***	***
White or lighter	Share of quantity	***	***	***	***	***
Extra light amber	Share of quantity	***	***	***	***	***
Light amber	Share of quantity	***	***	***	***	***
Amber or darker	Share of quantity	***	***	***	***	***
All honey colors	Share of quantity	***	***	***	***	***
White or lighter	Share of value	***	***	***	***	***
Extra light amber	Share of value	***	***	***	***	***
Light amber	Share of value	***	***	***	***	***
Amber or darker	Share of value	***	***	***	***	***
All honey colors	Share of value	***	***	***	***	***

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

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

Table E-9
Raw honey: U.S. producers' and importers' U.S. shipments unit values by source, color, and period

Unit values in dollars per pound

Source	Honey color	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
United States	White or lighter	1.76	1.57	1.59	1.60	1.69
Argentina	White or lighter	***	***	***	***	***
Brazil	White or lighter	***	***	***	***	***
India	White or lighter	***	***	***	***	***
Vietnam	White or lighter	***	***	***	***	***
Subject sources	White or lighter	***	***	***	***	***
Nonsubject sources	White or lighter	***	***	***	***	***
All import sources	White or lighter	***	***	***	***	***
United States	Extra light amber	1.87	1.65	1.56	1.51	1.76
Argentina	Extra light amber	***	***	***	***	***
Brazil	Extra light amber	***	***	***	***	***
India	Extra light amber	***	***	***	***	***
Vietnam	Extra light amber	***	***	***	***	***
Subject sources	Extra light amber	***	***	***	***	***
Nonsubject sources	Extra light amber	***	***	***	***	***
All import sources	Extra light amber	***	***	***	***	***
United States	Light amber	1.73	1.54	1.60	1.62	1.96
Argentina	Light amber	***	***	***	***	***
Brazil	Light amber	***	***	***	***	***
India	Light amber	***	***	***	***	***
Vietnam	Light amber	***	***	***	***	***
Subject sources	Light amber	***	***	***	***	***
Nonsubject sources	Light amber	***	***	***	***	***
All import sources	Light amber	***	***	***	***	***

Table continued.

Table E-9 continued
Raw honey: U.S. producers' and importers' U.S. shipments unit values by source, color, and period

Unit values in dollars per pound

Source	Honey color	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
United States	Amber or darker	1.60	1.25	1.38	1.40	1.96
Argentina	Amber or darker	***	***	***	***	***
Brazil	Amber or darker	***	***	***	***	***
India	Amber or darker	***	***	***	***	***
Vietnam	Amber or darker	***	***	***	***	***
Subject sources	Amber or darker	***	***	***	***	***
Nonsubject sources	Amber or darker	***	***	***	***	***
All import sources	Amber or darker	***	***	***	***	***
United States	All honey colors	1.78	1.57	1.58	1.58	1.75
Argentina	All honey colors	***	***	***	***	***
Brazil	All honey colors	***	***	***	***	***
India	All honey colors	***	***	***	***	***
Vietnam	All honey colors	***	***	***	***	***
Subject sources	All honey colors	***	***	***	***	***
Nonsubject sources	All honey colors	***	***	***	***	***
All import sources	All honey colors	***	***	***	***	***

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

U.S. SHIPMENTS BY PRODUCT TYPE

Table F-1
Raw honey: Larger U.S. producers' U.S. shipments, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	---	---	---	---	---
Conventional	Quantity	34,599	34,238	36,992	29,210	32,822
All product types	Quantity	34,599	34,238	36,992	29,210	32,822
Organic	Value	---	---	---	---	---
Conventional	Value	61,485	53,924	58,425	46,115	57,457
All product types	Value	61,485	53,924	58,425	46,115	57,457
Organic	Unit value	---	---	---	---	---
Conventional	Unit value	1.78	1.57	1.58	1.58	1.75
All product types	Unit value	1.78	1.57	1.58	1.58	1.75
Organic	Share of quantity	---	---	---	---	---
Conventional	Share of quantity	100.0	100.0	100.0	100.0	100.0
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	---	---	---	---	---
Conventional	Share of value	100.0	100.0	100.0	100.0	100.0
All product types	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-2
Raw honey: U.S. importers' U.S. shipments of imports from Argentina, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	449	570	3,687	2,192	1,942
Conventional	Quantity	79,390	79,812	83,887	65,947	76,762
All product types	Quantity	79,839	80,382	87,574	68,139	78,703
Organic	Value	729	673	4,369	2,489	2,756
Conventional	Value	88,728	82,915	92,511	71,101	124,837
All product types	Value	89,457	83,588	96,880	73,591	127,592
Organic	Unit value	1.62	1.18	1.19	1.14	1.42
Conventional	Unit value	1.12	1.04	1.10	1.08	1.63
All product types	Unit value	1.12	1.04	1.11	1.08	1.62
Organic	Share of quantity	0.6	0.7	4.2	3.2	2.5
Conventional	Share of quantity	99.4	99.3	95.8	96.8	97.5
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	0.8	0.8	4.5	3.4	2.2
Conventional	Share of value	99.2	99.2	95.5	96.6	97.8
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

Table F-3
Raw honey: U.S. importers' U.S. shipments of imports from Brazil, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	47,347	46,999	65,844	52,299	63,044
Conventional	Quantity	4,662	5,694	9,528	6,769	5,800
All product types	Quantity	52,009	52,693	75,371	59,068	68,843
Organic	Value	74,278	51,351	63,018	48,270	100,101
Conventional	Value	7,704	6,777	10,202	6,387	9,315
All product types	Value	81,982	58,128	73,220	54,657	109,415
Organic	Unit value	1.57	1.09	0.96	0.92	1.59
Conventional	Unit value	1.65	1.19	1.07	0.94	1.61
All product types	Unit value	1.58	1.10	0.97	0.93	1.59
Organic	Share of quantity	91.0	89.2	87.4	88.5	91.6
Conventional	Share of quantity	9.0	10.8	12.6	11.5	8.4
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	90.6	88.3	86.1	88.3	91.5
Conventional	Share of value	9.4	11.7	13.9	11.7	8.5
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

Table F-4
Raw honey: U.S. importers' U.S. shipments of imports from India, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	731	1,246	2,653	1,526	5,508
Conventional	Quantity	95,484	108,066	79,964	64,040	101,395
All product types	Quantity	96,215	109,312	82,617	65,566	106,903
Organic	Value	931	1,108	2,125	1,255	6,273
Conventional	Value	80,079	85,163	60,517	48,603	99,374
All product types	Value	81,011	86,271	62,641	49,858	105,647
Organic	Unit value	1.27	0.89	0.80	0.82	1.14
Conventional	Unit value	0.84	0.79	0.76	0.76	0.98
All product types	Unit value	0.84	0.79	0.76	0.76	0.99
Organic	Share of quantity	0.8	1.1	3.2	2.3	5.2
Conventional	Share of quantity	99.2	98.9	96.8	97.7	94.8
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	1.1	1.3	3.4	2.5	5.9
Conventional	Share of value	98.9	98.7	96.6	97.5	94.1
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

Table F-5
Raw honey: U.S. importers' U.S. shipments of imports from Vietnam, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	---	421	502	502	496
Conventional	Quantity	86,325	81,105	110,854	80,561	98,978
All product types	Quantity	86,325	81,526	111,356	81,063	99,475
Organic	Value	---	272	298	298	384
Conventional	Value	61,769	52,559	68,060	49,221	79,566
All product types	Value	61,769	52,830	68,358	49,519	79,950
Organic	Unit value	---	0.64	0.59	0.59	0.77
Conventional	Unit value	0.72	0.65	0.61	0.61	0.80
All product types	Unit value	0.72	0.65	0.61	0.61	0.80
Organic	Share of quantity	---	0.5	0.5	0.6	0.5
Conventional	Share of quantity	100.0	99.5	99.5	99.4	99.5
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	---	0.5	0.4	0.6	0.5
Conventional	Share of value	100.0	99.5	99.6	99.4	99.5
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

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-6
Raw honey: U.S. importers' U.S. shipments of imports from subject sources, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	48,527	49,237	72,686	56,519	70,990
Conventional	Quantity	265,860	274,676	284,233	217,317	282,935
All product types	Quantity	314,387	323,913	356,918	273,836	353,925
Organic	Value	75,938	53,404	69,810	52,312	109,513
Conventional	Value	238,280	227,413	231,291	175,312	313,092
All product types	Value	314,218	280,817	301,100	227,624	422,605
Organic	Unit value	1.56	1.08	0.96	0.93	1.54
Conventional	Unit value	0.90	0.83	0.81	0.81	1.11
All product types	Unit value	1.00	0.87	0.84	0.83	1.19
Organic	Share of quantity	15.4	15.2	20.4	20.6	20.1
Conventional	Share of quantity	84.6	84.8	79.6	79.4	79.9
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	24.2	19.0	23.2	23.0	25.9
Conventional	Share of value	75.8	81.0	76.8	77.0	74.1
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

Table F-7
Raw honey: U.S. importers' U.S. shipments of imports from nonsubject sources, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	3,186	3,323	7,775	5,124	3,592
Conventional	Quantity	84,875	57,873	56,752	42,348	36,530
All product types	Quantity	88,061	61,196	64,528	47,473	40,122
Organic	Value	6,656	5,288	9,695	6,683	6,214
Conventional	Value	124,157	90,055	84,922	64,101	75,865
All product types	Value	130,813	95,342	94,618	70,784	82,079
Organic	Unit value	2.09	1.59	1.25	1.30	1.73
Conventional	Unit value	1.46	1.56	1.50	1.51	2.08
All product types	Unit value	1.49	1.56	1.47	1.49	2.05
Organic	Share of quantity	3.6	5.4	12.0	10.8	9.0
Conventional	Share of quantity	96.4	94.6	88.0	89.2	91.0
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	5.1	5.5	10.2	9.4	7.6
Conventional	Share of value	94.9	94.5	89.8	90.6	92.4
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

Table F-8
Raw honey: U.S. importers' U.S. shipments of imports from all imports sources, by product type and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Product type	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Organic	Quantity	51,712	52,560	80,461	61,643	74,582
Conventional	Quantity	350,735	332,549	340,985	259,665	319,465
All product types	Quantity	402,448	385,109	421,446	321,309	394,047
Organic	Value	82,594	58,692	79,505	58,994	115,727
Conventional	Value	362,437	317,468	316,213	239,413	388,957
All product types	Value	445,031	376,160	395,718	298,408	504,684
Organic	Unit value	1.60	1.12	0.99	0.96	1.55
Conventional	Unit value	1.03	0.95	0.93	0.92	1.22
All product types	Unit value	1.11	0.98	0.94	0.93	1.28
Organic	Share of quantity	12.8	13.6	19.1	19.2	18.9
Conventional	Share of quantity	87.2	86.4	80.9	80.8	81.1
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Organic	Share of value	18.6	15.6	20.1	19.8	22.9
Conventional	Share of value	81.4	84.4	79.9	80.2	77.1
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

Table F-9
Raw honey: U.S. producers' and U.S. importers' U.S. shipments unit values by source, product type, and period

Unit values in dollars per pound

Source	Honey color	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
United States	Organic	---	---	---	---	---
Argentina	Organic	1.62	1.18	1.19	1.14	1.42
Brazil	Organic	1.57	1.09	0.96	0.92	1.59
India	Organic	1.27	0.89	0.80	0.82	1.14
Vietnam	Organic	---	0.64	0.59	0.59	0.77
Subject sources	Organic	1.56	1.08	0.96	0.93	1.54
Nonsubject sources	Organic	2.09	1.59	1.25	1.30	1.73
All import sources	Organic	1.60	1.12	0.99	0.96	1.55
United States	Conventional	1.78	1.57	1.58	1.58	1.75
Argentina	Conventional	1.12	1.04	1.10	1.08	1.63
Brazil	Conventional	1.65	1.19	1.07	0.94	1.61
India	Conventional	0.84	0.79	0.76	0.76	0.98
Vietnam	Conventional	0.72	0.65	0.61	0.61	0.80
Subject sources	Conventional	0.90	0.83	0.81	0.81	1.11
Nonsubject sources	Conventional	1.46	1.56	1.50	1.51	2.08
All import sources	Conventional	1.03	0.95	0.93	0.92	1.22
United States	All types	1.78	1.57	1.58	1.58	1.75
Argentina	All types	1.12	1.04	1.11	1.08	1.62
Brazil	All types	1.58	1.10	0.97	0.93	1.59
India	All types	0.84	0.79	0.76	0.76	0.99
Vietnam	All types	0.72	0.65	0.61	0.61	0.80
Subject sources	All types	1.00	0.87	0.84	0.83	1.19
Nonsubject sources	All types	1.49	1.56	1.47	1.49	2.05
All import sources	All types	1.11	0.98	0.94	0.93	1.28

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value.

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 G

APPARENT CONSUMPTION AND INVENTORIES WITH FULL YEAR 2021

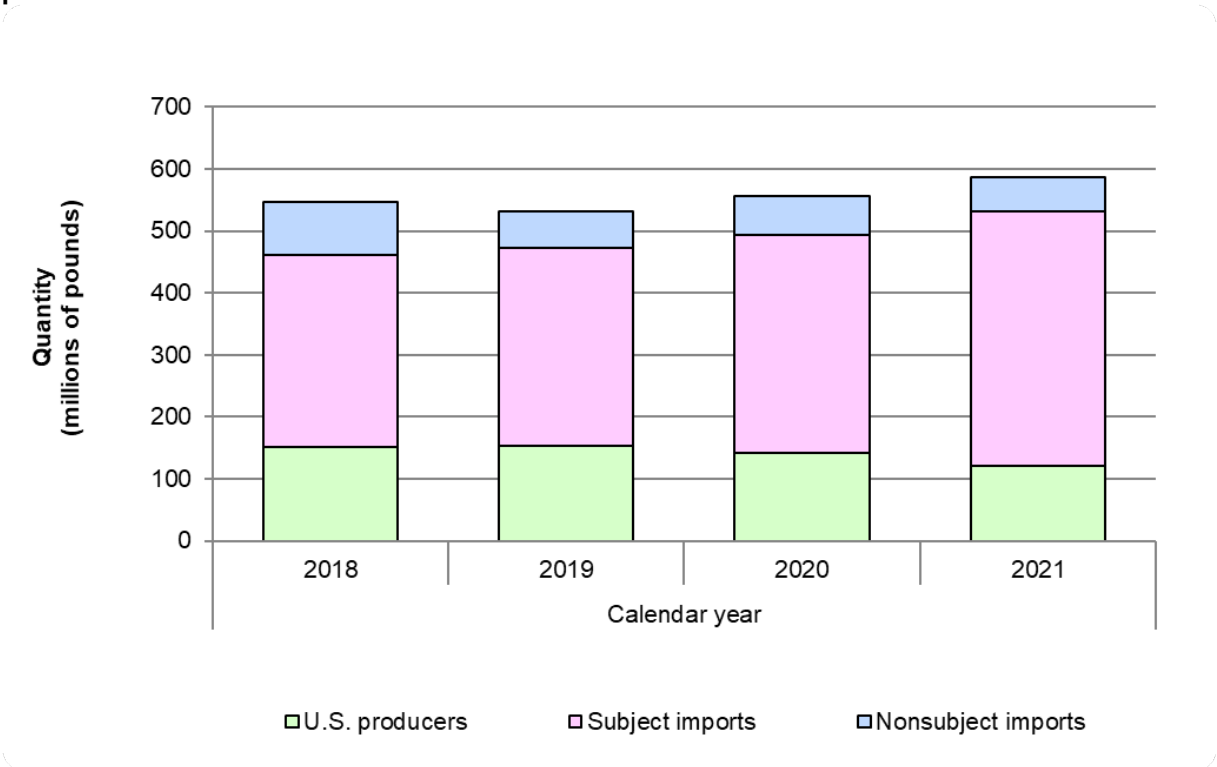
Table G-1
Raw honey: Apparent U.S. consumption and market shares based on quantity including full year 2021, by source and period

Quantity in 1,000 pounds; Share in percent

Source	Measure	2018	2019	2020	2021
U.S. producers	Quantity	150,778	153,222	141,694	121,693
Argentina	Quantity	79,839	78,083	84,935	94,337
Brazil	Quantity	52,009	52,693	75,371	70,395
India	Quantity	96,215	106,910	79,997	122,505
Vietnam	Quantity	83,335	81,526	111,356	123,224
Subject sources	Quantity	311,397	319,212	351,660	410,461
Canada	Quantity	32,142	16,333	8,614	6,214
Ukraine	Quantity	18,168	19,051	24,161	13,024
All other sources	Quantity	34,902	23,375	30,857	36,034
Nonsubject sources	Quantity	85,212	58,760	63,633	55,272
All import sources	Quantity	396,609	377,972	415,292	465,732
All sources	Quantity	547,387	531,194	556,986	587,425
U.S. producers	Share	27.5	28.8	25.4	20.7
Argentina	Share	14.6	14.7	15.2	16.1
Brazil	Share	9.5	9.9	13.5	12.0
India	Share	17.6	20.1	14.4	20.9
Vietnam	Share	15.2	15.3	20.0	21.0
Subject sources	Share	56.9	60.1	63.1	69.9
Canada	Share	5.9	3.1	1.5	1.1
Ukraine	Share	3.3	3.6	4.3	2.2
All other sources	Share	6.4	4.4	5.5	6.1
Nonsubject sources	Share	15.6	11.1	11.4	9.4
All import sources	Share	72.5	71.2	74.6	79.3
All sources	Share	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted questionnaire experience. Domestic exports (not shown separately in the table) are netted out of the NASS data used for U.S. producers.

Figure G-1
Raw honey: Apparent U.S. consumption based on quantity including full year 2021, by source and period



Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted questionnaire experience. Domestic exports are netted out of the NASS data used for U.S. producers.

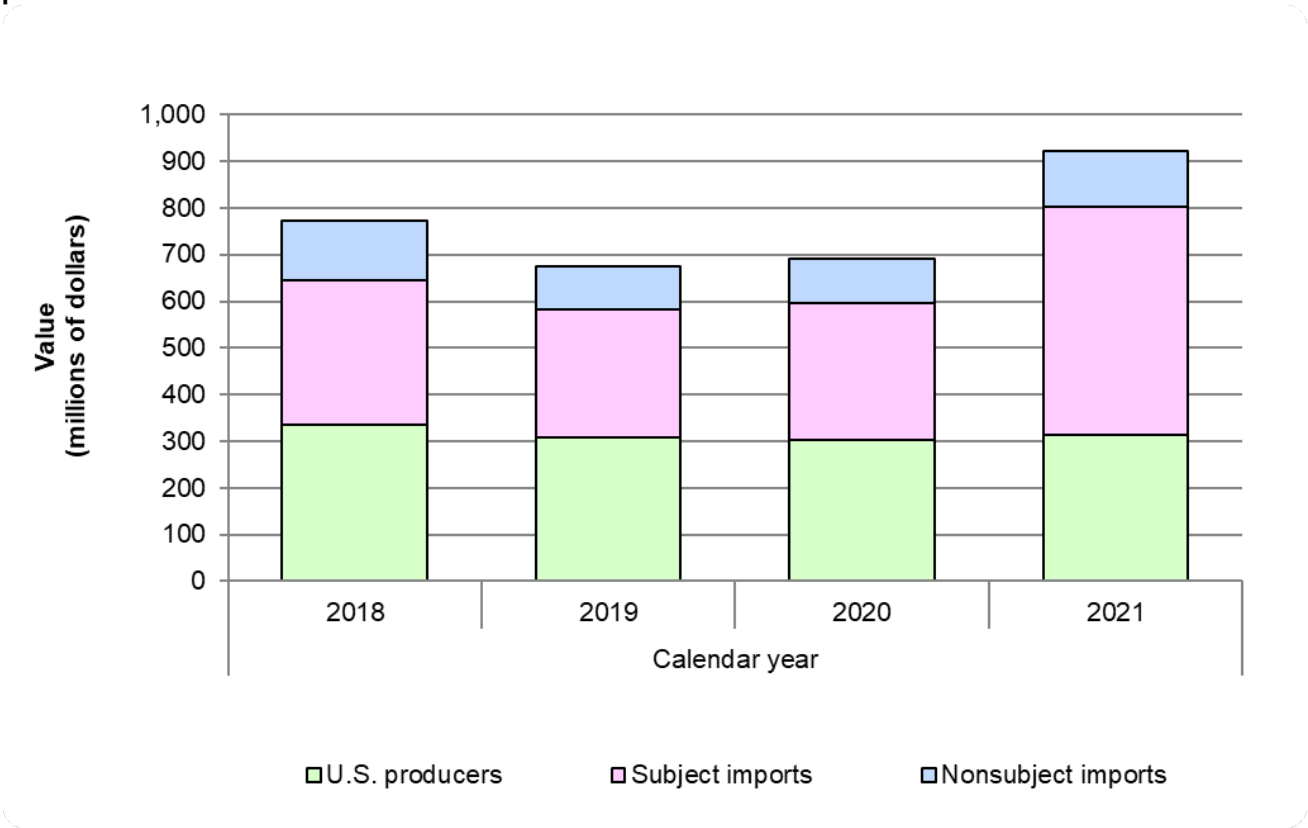
Table G-2
Raw honey: Apparent U.S. consumption and market shares based on value including full year 2021, by source and period

Value in 1,000 dollars; Share in percent

Source	Measure	2018	2019	2020	2021
U.S. producers	Value	335,134	307,192	301,592	313,536
Argentina	Value	89,457	81,194	94,106	153,780
Brazil	Value	81,982	58,128	73,220	113,606
India	Value	81,011	84,015	59,877	122,999
Vietnam	Value	58,289	52,830	68,358	99,390
Subject sources	Value	310,738	276,168	295,562	489,775
Canada	Value	45,656	23,275	12,873	12,524
Ukraine	Value	17,067	17,381	20,139	13,484
All other sources	Value	64,403	50,456	59,925	92,241
Nonsubject sources	Value	127,125	91,112	92,938	118,249
All import sources	Value	437,863	367,279	388,500	608,024
All sources	Value	772,997	674,471	690,092	921,560
U.S. producers	Share	43.4	45.5	43.7	34.0
Argentina	Share	11.6	12.0	13.6	16.7
Brazil	Share	10.6	8.6	10.6	12.3
India	Share	10.5	12.5	8.7	13.3
Vietnam	Share	7.5	7.8	9.9	10.8
Subject sources	Share	40.2	40.9	42.8	53.1
Canada	Share	5.9	3.5	1.9	1.4
Ukraine	Share	2.2	2.6	2.9	1.5
All other sources	Share	8.3	7.5	8.7	10.0
Nonsubject sources	Share	16.4	13.5	13.5	12.8
All import sources	Share	56.6	54.5	56.3	66.0
All sources	Share	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted questionnaire experience. Domestic exports (not shown separately in the table) are netted out of the NASS data used for U.S. producers.

Figure G-2
Raw honey: Apparent U.S. consumption based on value including full year 2021, by source and period



Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted questionnaire experience. Domestic exports are netted out of the NASS data used for U.S. producers.

Table G-3
Raw honey: U.S producers' ending stocks and their ratio to select items, by period

Quantity in 1,000 pounds; Inventory ratios in percent

Item	2018	2019	2020	2021
Ending stocks quantity	29,303	40,861	39,715	23,527
Inventory ratio to U.S. production	19.0	26.0	26.9	18.6
Inventory ratio to U.S. shipments	19.4	26.7	28.0	19.3

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022.

APPENDIX H

RELATED PARTY EXCLUSION TRADE DATA

Table H-1
Raw honey: U.S. producers' production and average yield per colony excluding two U.S. producers * and ***, by period**

Quantity in 1,000 pounds; Yield in pounds per colony

Item	2018	2019	2020	2021
Production (1,000 pounds)	***	***	***	***
Yield (pounds per colony)	***	***	***	***

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022 and from data submitted in response to Commission questionnaires.

Note: Data presented for 2021 appear under interim period Jan-Sep 2021 in table C-2 as footnoted in that table.

Figure H-1
Raw honey: U.S. producers' production and average yield per colony excluding two U.S. producers * and ***, by period**

* * * * * * *

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022 and from data submitted in response to Commission questionnaires.

Table H-2
Raw honey: U.S producers' shipments by location of shipment excluding two U.S. producers * and ***, by period**

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
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	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	***	***	***	***	***

Source: Compiled from data reported by the National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), accessed March 20, 2022, domestic U.S. exports reported by the Census Bureau of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022 and from data submitted in response to Commission questionnaires.

Note: Partial year period U.S. shipments are derived using the full year NASS data for 2020 and 2021 adjusted down for the partial year period using the share of annual U.S. producer shipments reported between January to September in questionnaire responses to the prelimary investigation and further adjusted to exclude two U.S. producers.

Table H-3
Raw honey: Large U.S. producers' inventories and their ratio to select items excluding two U.S. producers * and ***, by period**

Quantity in 1,000 pounds; Inventory ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
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 H-4
Raw honey: All U.S. producers' inventories and their ratio to select items excluding two U.S. producers * and ***, by period**

Quantity in 1,000 pounds; Inventory ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
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 H-5
Raw honey: Large U.S. producers' employment related information excluding two U.S. producers' * and ***, by item and period**

Quantity in 1,000 pounds; Inventory ratios in percent

Item	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
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: Wage based metrics includes large producer compensated and the estimated large producer non-compensated wage data.

Table H-6
Raw honey: All U.S. producers' employment related information excluding two U.S. producers * and ***, by item and period**

Item	2018	2019	2020
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: Wage based metrics for all U.S. producers includes large producer compensated, the estimated large producer non-compensated and derived small producers wage data.

Table H-7
Raw honey: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 pounds; Shares in percent

Source	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Included U.S. producers	Quantity	***	***	***	***	***
Excluded U.S. producers	Quantity	***	***	***	***	***
All U.S. producers	Quantity	150,778	153,222	141,694	82,357	70,732
Argentina	Quantity	79,839	78,083	84,935	65,788	78,703
Brazil	Quantity	52,009	52,693	75,371	59,068	64,776
India	Quantity	96,215	106,910	79,997	63,231	105,902
Vietnam	Quantity	83,335	81,526	111,356	81,063	99,475
Subject sources	Quantity	311,397	319,212	351,660	269,150	348,856
Canada	Quantity	32,142	16,333	8,614	6,891	3,971
Ukraine	Quantity	18,168	19,051	24,161	16,652	12,883
All other sources	Quantity	34,902	23,375	30,857	23,929	23,146
Nonsubject sources	Quantity	85,212	58,760	63,633	47,473	40,000
All import sources	Quantity	396,609	377,972	415,292	316,622	388,856
All sources	Quantity	547,387	531,194	556,986	398,979	459,587
Included U.S. producers	Share	***	***	***	***	***
Excluded U.S. producers	Share	***	***	***	***	***
All U.S. producers	Share	27.5	28.8	25.4	20.6	15.4
Argentina	Share	14.6	14.7	15.2	16.5	17.1
Brazil	Share	9.5	9.9	13.5	14.8	14.1
India	Share	17.6	20.1	14.4	15.8	23.0
Vietnam	Share	15.2	15.3	20.0	20.3	21.6
Subject sources	Share	56.9	60.1	63.1	67.5	75.9
Canada	Share	5.9	3.1	1.5	1.7	0.9
Ukraine	Share	3.3	3.6	4.3	4.2	2.8
All other sources	Share	6.4	4.4	5.5	6.0	5.0
Nonsubject sources	Share	15.6	11.1	11.4	11.9	8.7
All import sources	Share	72.5	71.2	74.6	79.4	84.6
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted export shipments by source as reported in U.S. importer questionnaire responses. Domestic exports (not shown separately in the table) are netted out of the NASS data used for U.S. producers.

Table H-8
Raw honey: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; Shares in percent

Source	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Included U.S. producers	Value	***	***	***	***	***
Excluded U.S. producers	Value	***	***	***	***	***
All U.S. producers	Value	335,134	307,192	301,592	175,295	182,237
Argentina	Value	89,457	81,194	94,106	70,852	127,592
Brazil	Value	81,982	58,128	73,220	54,657	103,908
India	Value	81,011	84,015	59,877	47,129	104,878
Vietnam	Value	58,289	52,830	68,358	49,519	79,950
Subject sources	Value	310,738	276,168	295,562	222,157	416,328
Canada	Value	45,656	23,275	12,873	10,018	7,345
Ukraine	Value	17,067	17,381	20,139	13,799	13,296
All other sources	Value	64,403	50,456	59,925	46,967	61,172
Nonsubject sources	Value	127,125	91,112	92,938	70,784	81,814
All import sources	Value	437,863	367,279	388,500	292,941	498,141
All sources	Value	772,997	674,471	690,092	468,236	680,379
Included U.S. producers	Share	***	***	***	***	***
Excluded U.S. producers	Share	***	***	***	***	***
All U.S. producers	Share	43.4	45.5	43.7	37.4	26.8
Argentina	Share	11.6	12.0	13.6	15.1	18.8
Brazil	Share	10.6	8.6	10.6	11.7	15.3
India	Share	10.5	12.5	8.7	10.1	15.4
Vietnam	Share	7.5	7.8	9.9	10.6	11.8
Subject sources	Share	40.2	40.9	42.8	47.4	61.2
Canada	Share	5.9	3.5	1.9	2.1	1.1
Ukraine	Share	2.2	2.6	2.9	2.9	2.0
All other sources	Share	8.3	7.5	8.7	10.0	9.0
Nonsubject sources	Share	16.4	13.5	13.5	15.1	12.0
All import sources	Share	56.6	54.5	56.3	62.6	73.2
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. agricultural statistics National Agriculture Statistics Services (NASS) of the U.S. Department of Agriculture (USDA), from official U.S. import statistics of the U.S. Department of Commerce using statistical reporting numbers 0409.00.0005, 0409.00.0035, 0409.00.0045, 0409.00.0056, and 0409.00.0065, accessed February 18, 2022 and from official U.S. export statistics of the U.S. Department of Commerce using schedule B number 0409.00.0055, accessed February 22, 2022. U.S. import statistics are based on imports for consumption and landed duty paid value and U.S. exports statistics are based on foreign-origin exports (also known as re-exports). Re-exports are deducted from each individual country source based on submitted export shipments by source as reported in U.S. importer questionnaire responses. Domestic exports (not shown separately in the table) are netted out of the NASS data used for U.S. producers.

APPENDIX J

PURCHASE PRICES FOR NONSUBJECT UKRAINE

Tables J-1 to J-3 present purchase price data reported for raw honey imported from nonsubject Ukraine for pricing products 1, 2, and 3. No purchase price data were reported for pricing product 4. Figures J-1 to J-3 correspond to figures V-1 to V-3.

Table J-1
Raw honey: Weighted-average prices and quantities of purchases of domestic and imported product 1, by quarter

Quantity in 1,000 pounds; Prices in dollars per pound

Period	U.S. purchase price	U.S. quantity	Ukraine purchase price	Ukraine quantity
2018 Q1	2.06	4,648	***	***
2018 Q2	***	***	***	***
2018 Q3	2.01	9,296	***	***
2018 Q4	1.95	8,867	***	***
2019 Q1	1.98	1,245	***	***
2019 Q2	***	***	***	***
2019 Q3	1.78	11,904	***	***
2019 Q4	1.68	8,578	***	***
2020 Q1	1.60	4,450	***	***
2020 Q2	***	***	***	***
2020 Q3	1.55	13,635	***	***
2020 Q4	1.49	14,589	***	***
2021 Q1	1.70	4,099	***	***
2021 Q2	***	***	***	***
2021 Q3	2.29	8,311	***	***

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

Note: Product 1: Raw white honey (0 – 34 mm), packaged in 55-gallon drums.
.

Table J-2
Raw honey: Weighted-average prices and quantities of purchases of domestic and imported product 2, by quarter

Quantity in 1,000 pounds; Prices in dollars per pound

Period	U.S. purchase price	U.S. quantity	Ukraine purchase price	Ukraine quantity
2018 Q1	2.16	4,977	1.10	1,746
2018 Q2	1.86	11,935	1.14	1,080
2018 Q3	2.05	6,140	1.05	1,380
2018 Q4	2.01	4,586	1.03	2,469
2019 Q1	1.89	1,384	1.02	4,559
2019 Q2	1.70	10,432	1.00	2,679
2019 Q3	1.89	5,246	1.00	2,149
2019 Q4	1.82	2,223	1.02	891
2020 Q1	1.59	1,056	0.94	2,235
2020 Q2	***	***	0.93	3,475
2020 Q3	***	***	0.90	2,648
2020 Q4	1.52	6,752	0.92	3,325
2021 Q1	1.78	4,629	0.93	4,495
2021 Q2	1.68	7,400	1.08	5,065
2021 Q3	2.24	5,620	1.25	1,645

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

Note: Product 2: Raw extra light amber honey (35 – 50 mm), packaged in 55-gallon drums.
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Table J-3
Raw honey: Weighted-average prices and quantities of purchases of domestic and imported product 3, by quarter

Quantity in 1,000 pounds; Prices in dollars per pound

Period	U.S. purchase price	U.S. quantity	Ukraine purchase price	Ukraine quantity
2018 Q1	1.95	988	***	***
2018 Q2	***	***	***	***
2018 Q3	1.98	2,288	***	***
2018 Q4	1.87	3,339	***	***
2019 Q1	1.79	1,406	***	***
2019 Q2	***	***	***	***
2019 Q3	1.85	3,015	***	***
2019 Q4	1.80	3,406	***	***
2020 Q1	1.54	1,433	***	***
2020 Q2	1.30	7,055	***	***
2020 Q3	1.70	4,573	***	***
2020 Q4	1.68	2,892	***	***
2021 Q1	1.79	1,331	***	***
2021 Q2	1.60	4,613	***	***
2021 Q3	2.10	3,046	***	***

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

Note: Product 3: Raw light amber honey (51 – 85 mm), packaged in 55-gallon drums.
.

Figure J-1
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

* * * * * * *

Figure J-2
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

* * * * * * *

Figure J-3
Raw honey: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

* * * * * * *

APPENDIX K

EXCLUDED PURCHASE PRICE DATA FROM CERTAIN U.S. PURCHASERS

The purchase price data reported by five U.S. purchasers *** were excluded from the data presented in Part V, and are presented in tables K-1 through K-4. Data are excluded for purchaser *** because many other purchasers reported sourcing their purchases from the firm. Reported purchase price data reported for *** was minimal and accounted for less than *** percent of reported purchases of responding purchasers. Additionally, purchase price data from ingredient and end users *** were excluded because they sourced from packers that had already reported purchase price data, reported purchase prices for products that were ***, and were only able to report prices were sold in bulk containers rather than 55 gallon drums, as specified in the purchase price product definitions in Part V.

Purchase price data for pricing product 1 were reported by *** for their purchases from U.S. producers. Purchase price data for product 2 were reported by *** for purchases from U.S. producers. Purchasers *** All excluded purchasers *** reported purchase price data for product 3, and purchasers *** reported purchase price data for product 4.

Table K-1
Raw honey: Excluded firms weighted-average purchase prices and quantities of purchases of domestic and imported subject product 1, by quarter

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

Period	Purchase price product	***'s U.S. purchase price	***'s U.S. quantity	***'s U.S. purchase price	***'s U.S. quantity
2018 Q1	Product 1	***	***	***	***
2018 Q2	Product 1	***	***	***	***
2018 Q3	Product 1	***	***	***	***
2018 Q4	Product 1	***	***	***	***
2019 Q1	Product 1	***	***	***	***
2019 Q2	Product 1	***	***	***	***
2019 Q3	Product 1	***	***	***	***
2019 Q4	Product 1	***	***	***	***
2020 Q1	Product 1	***	***	***	***
2020 Q2	Product 1	***	***	***	***
2020 Q3	Product 1	***	***	***	***
2020 Q4	Product 1	***	***	***	***
2021 Q1	Product 1	***	***	***	***
2021 Q2	Product 1	***	***	***	***
2021 Q3	Product 1	***	***	***	***

Compiled from data submitted in response to Commission questionnaires.

Table K-2
Raw honey: Excluded firms weighted-average purchase prices and quantities of purchases of domestic and imported subject product 2, by quarter

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

Period	Purchase price product	***'s U.S. purchase price	***'s U.S. quantity
2018 Q1	Product 2	***	***
2018 Q2	Product 2	***	***
2018 Q3	Product 2	***	***
2018 Q4	Product 2	***	***
2019 Q1	Product 2	***	***
2019 Q2	Product 2	***	***
2019 Q3	Product 2	***	***
2019 Q4	Product 2	***	***
2020 Q1	Product 2	***	***
2020 Q2	Product 2	***	***
2020 Q3	Product 2	***	***
2020 Q4	Product 2	***	***
2021 Q1	Product 2	***	***
2021 Q2	Product 2	***	***
2021 Q3	Product 2	***	***

Compiled from data submitted in response to Commission questionnaires.

Table K-3
Raw honey: Excluded firms weighted-average purchase prices and quantities of purchases of domestic and imported subject product 3, by quarter

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

Period	Purchase price product	***'s U.S. purchase price	***'s U.S. quantity	***'s U.S. purchase price	***'s U.S. quantity
2018 Q1	Product 3	***	***	***	***
2018 Q2	Product 3	***	***	***	***
2018 Q3	Product 3	***	***	***	***
2018 Q4	Product 3	***	***	***	***
2019 Q1	Product 3	***	***	***	***
2019 Q2	Product 3	***	***	***	***
2019 Q3	Product 3	***	***	***	***
2019 Q4	Product 3	***	***	***	***
2020 Q1	Product 3	***	***	***	***
2020 Q2	Product 3	***	***	***	***
2020 Q3	Product 3	***	***	***	***
2020 Q4	Product 3	***	***	***	***
2021 Q1	Product 3	***	***	***	***
2021 Q2	Product 3	***	***	***	***
2021 Q3	Product 3	***	***	***	***

Period	Purchase price product	***'s subject source purchase price	***'s subject source quantity	***'s subject source purchase price	***'s subject source quantity
2018 Q1	Product 3	***	***	***	***
2018 Q2	Product 3	***	***	***	***
2018 Q3	Product 3	***	***	***	***
2018 Q4	Product 3	***	***	***	***
2019 Q1	Product 3	***	***	***	***
2019 Q2	Product 3	***	***	***	***
2019 Q3	Product 3	***	***	***	***
2019 Q4	Product 3	***	***	***	***
2020 Q1	Product 3	***	***	***	***
2020 Q2	Product 3	***	***	***	***
2020 Q3	Product 3	***	***	***	***
2020 Q4	Product 3	***	***	***	***
2021 Q1	Product 3	***	***	***	***
2021 Q2	Product 3	***	***	***	***
2021 Q3	Product 3	***	***	***	***

Table continued.

Table K-3 continued
Raw honey: Excluded firms weighted-average purchase prices and quantities of purchases of domestic and imported subject product 3, by quarter

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

Period	Purchase price product	***'s subject source purchase price	***'s subject source quantity	***'s subject source purchase price	***'s subject source quantity
2018 Q1	Product 3	***	***	***	***
2018 Q2	Product 3	***	***	***	***
2018 Q3	Product 3	***	***	***	***
2018 Q4	Product 3	***	***	***	***
2019 Q1	Product 3	***	***	***	***
2019 Q2	Product 3	***	***	***	***
2019 Q3	Product 3	***	***	***	***
2019 Q4	Product 3	***	***	***	***
2020 Q1	Product 3	***	***	***	***
2020 Q2	Product 3	***	***	***	***
2020 Q3	Product 3	***	***	***	***
2020 Q4	Product 3	***	***	***	***
2021 Q1	Product 3	***	***	***	***
2021 Q2	Product 3	***	***	***	***
2021 Q3	Product 3	***	***	***	***

Compiled from data submitted in response to Commission questionnaires.

Table K-4
Raw honey: Excluded firms weighted-average purchase prices and quantities of purchases of domestic and imported subject product 4, by quarter

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

Period	Purchase price product	***'s U.S. purchase price	***'s U.S. quantity	***'s subject source purchase price	***'s subject source quantity	***'s subject source purchase price	***'s subject source quantity
2018 Q1	Product 4	***	***	***	***	***	***
2018 Q2	Product 4	***	***	***	***	***	***
2018 Q3	Product 4	***	***	***	***	***	***
2018 Q4	Product 4	***	***	***	***	***	***
2019 Q1	Product 4	***	***	***	***	***	***
2019 Q2	Product 4	***	***	***	***	***	***
2019 Q3	Product 4	***	***	***	***	***	***
2019 Q4	Product 4	***	***	***	***	***	***
2020 Q1	Product 4	***	***	***	***	***	***
2020 Q2	Product 4	***	***	***	***	***	***
2020 Q3	Product 4	***	***	***	***	***	***
2020 Q4	Product 4	***	***	***	***	***	***
2021 Q1	Product 4	***	***	***	***	***	***
2021 Q2	Product 4	***	***	***	***	***	***
2021 Q3	Product 4	***	***	***	***	***	***

Compiled from data submitted in response to Commission questionnaires.

APPENDIX L

PRICE DATA FROM USDA/AMS

The U.S. Department of Agriculture's Agricultural Marketing Service ("USDA/AMS") publishes monthly domestic and import prices in the National Honey Report.[1] The National Honey Report publishes prices by color, floral source, and U.S. state or import country, and presents either a single price or a low and high price for each available combination depending on the number of transactions in that month. Tables L-1 to L-4 present the simple average prices reported for each color/country source combination by month, and correspond to figures V-6 to V-9.[2] [3] These price items are similar to the purchase price products in tables V-1 to V-4.

[1] The National Honey Report states that the data are generally for volumes of 10,000 pounds or greater. Domestic prices presented are for "prices paid to beekeepers for extracted, unprocessed honey in major producing states by packers, handlers and other large users, cents per pound, f.o.b. or delivered nearby, containers exchanged or returned, prompt delivery & payment unless otherwise stated." Import prices are "Prices paid to importers for bulk honey, duty paid, containers included, cents per pound, ex-dock or point of entry unless otherwise stated."

[2] In instances for which there were only a single price reported, this price is reported as both the high and low price.

[3] Staff calculated simple averages for each month, by origin and color, by dividing the sum of prices by the number of observations. The National Honey Report does not have quantities associated with each price or price range; therefore, staff are unable to calculate weighted average prices using USDA/AMS data.

Table L-1
Raw honey: Simple-average f.o.b. prices of domestic and imported product 1, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2018 M01	2.11	1.38	34.9	1.95	7.7	---	---
2018 M02	2.09	1.35	35.5	2.06	1.5	---	---
2018 M03	2.13	1.82	14.2	1.95	8.2	0.93	56.2
2018 M04	2.25	1.56	30.5	1.70	24.4	0.97	57.0
2018 M05	2.27	1.29	43.2	1.72	24.3	0.95	58.3
2018 M06	2.18	1.32	39.5	1.84	15.8	0.99	54.8
2018 M07	2.63	1.31	50.2	1.70	35.4	0.99	62.5
2018 M08	2.16	1.31	39.3	---	---	0.92	57.4
2018 M09	1.96	1.25	36.3	1.66	15.4	0.99	49.8
2018 M10	1.91	1.28	33.1	1.71	10.3	0.94	50.7
2018 M11	1.89	1.28	32.4	---	---	0.94	50.4
2018 M12	1.89	1.23	34.8	1.99	(5.4)	0.94	50.5
2019 M01	1.90	1.23	35.4	---	---	---	---
2019 M02	1.79	1.24	30.8	1.30	27.5	0.94	47.6
2019 M03	2.01	1.23	39.2	---	---	---	---
2019 M04	2.60	1.18	54.6	---	---	0.87	66.5
2019 M05	1.99	1.18	40.9	---	---	0.83	58.2
2019 M06	2.09	1.17	44.3	---	---	0.83	60.4
2019 M07	1.97	1.17	40.6	---	---	0.84	57.5
2019 M08	1.90	1.14	40.4	1.47	22.8	0.82	57.2
2019 M09	1.76	1.13	35.9	---	---	0.82	53.3
2019 M10	1.84	1.13	38.4	---	---	0.83	54.9
2019 M11	1.73	1.13	34.9	---	---	0.83	52.1
2019 M12	1.82	1.13	38.1	1.75	4.0	0.79	56.7
2020 M01	1.76	1.15	34.9	---	---	0.83	52.9
2020 M02	1.57	1.16	25.7	---	---	0.78	50.2
2020 M03	1.55	1.16	25.2	0.96	38.1	---	---
2020 M04	1.53	1.19	22.3	---	---	---	---
2020 M05	1.71	1.19	30.5	---	---	---	---
2020 M06	1.69	1.29	23.5	---	---	0.85	49.9
2020 M07	1.64	1.29	21.4	---	---	0.82	50.0
2020 M08	1.72	1.31	24.1	---	---	0.79	54.4
2020 M09	1.68	1.27	24.6	---	---	0.75	55.5
2020 M10	1.60	1.30	18.7	1.16	27.3	0.74	54.0
2020 M11	1.65	1.32	19.8	1.51	8.8	---	---
2020 M12	1.64	1.37	16.2	1.63	0.7	---	---

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Table L-1 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 1, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2021 M01	1.76	1.32	25.2	---	---	---	---
2021 M02	1.63	1.39	14.6	1.75	(7.3)	1.18	27.7
2021 M03	1.83	1.47	19.6	1.79	2.4	0.96	47.9
2021 M04	1.82	1.58	13.3	---	---	1.04	42.7
2021 M05	1.85	1.58	14.8	1.75	5.5	1.01	45.6
2021 M06	1.98	1.72	13.2	---	---	1.09	45.1
2021 M07	1.98	1.86	6.1	1.90	3.8	1.01	48.7
2021 M08	2.23	1.86	16.6	---	---	1.08	51.6
2021 M09	2.28	1.86	18.5	---	---	1.03	54.8

Table continued on next page.

Table L-1 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 1, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2018 M01	2.11	---	---	---	---	1.66	21.3
2018 M02	2.09	---	---	---	---	1.71	18.5
2018 M03	2.13	---	---	---	---	1.63	23.2
2018 M04	2.25	---	---	---	---	1.39	38.3
2018 M05	2.27	---	---	---	---	1.25	45.1
2018 M06	2.18	1.01	53.6	---	---	1.24	43.0
2018 M07	2.63	1.04	60.4	---	---	1.27	51.7
2018 M08	2.16	1.07	50.7	---	---	1.13	47.5
2018 M09	1.96	---	---	---	---	1.29	34.5
2018 M10	1.91	---	---	---	---	1.23	35.6
2018 M11	1.89	1.03	45.4	---	---	1.13	40.1
2018 M12	1.89	1.01	46.5	---	---	1.22	35.3
2019 M01	1.90	0.98	48.4	---	---	1.10	41.9
2019 M02	1.79	---	---	---	---	1.13	36.8
2019 M03	2.01	---	---	---	---	1.23	39.2
2019 M04	2.60	---	---	---	---	1.03	60.6
2019 M05	1.99	---	---	---	---	0.95	52.4
2019 M06	2.09	0.93	55.6	---	---	0.99	53.0
2019 M07	1.97	0.93	52.7	---	---	0.99	49.8
2019 M08	1.90	---	---	---	---	1.07	43.6
2019 M09	1.76	---	---	---	---	0.98	44.6
2019 M10	1.84	---	---	---	---	1.03	43.9
2019 M11	1.73	0.95	45.1	---	---	1.01	41.8
2019 M12	1.82	---	---	---	---	1.12	38.7
2020 M01	1.76	---	---	---	---	0.99	43.9
2020 M02	1.57	0.96	38.7	---	---	1.02	35.1
2020 M03	1.55	0.91	41.6	---	---	1.01	34.9
2020 M04	1.53	0.93	39.6	---	---	1.06	30.9
2020 M05	1.71	0.92	46.3	---	---	1.06	38.4
2020 M06	1.69	0.89	47.2	---	---	1.01	40.2
2020 M07	1.64	0.90	45.0	---	---	0.96	41.6
2020 M08	1.72	0.91	47.1	---	---	1.08	37.4
2020 M09	1.68	---	---	---	---	1.10	34.9
2020 M10	1.60	---	---	---	---	1.12	29.7
2020 M11	1.65	---	---	---	---	1.41	14.3
2020 M12	1.64	0.85	48.1	---	---	1.37	16.4

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Table L-1 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 1, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2021 M01	1.76	---	---	---	---	1.32	25.2
2021 M02	1.63	0.93	43.0	---	---	1.33	18.5
2021 M03	1.83	0.93	49.3	---	---	1.41	23.0
2021 M04	1.82	1.01	44.8	---	---	1.21	33.6
2021 M05	1.85	1.05	43.3	---	---	1.33	28.2
2021 M06	1.98	---	---	---	---	1.51	23.8
2021 M07	1.98	---	---	---	---	1.53	22.7
2021 M08	2.23	1.70	23.9	---	---	1.52	32.1
2021 M09	2.28	---	---	---	---	1.44	36.6

Source: Compiled from USDA/AMS data, accessed November 23, 2021.
Note: Product 1: White honey (0 – 34 mm).

Table L-2
Raw honey: Simple-average f.o.b. prices of domestic and imported product 2, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2018 M01	2.02	1.36	32.8	2.01	0.7	0.99	51.1
2018 M02	2.00	1.27	36.4	1.91	4.6	0.91	54.4
2018 M03	2.23	1.50	32.8	1.94	13.4	0.97	56.6
2018 M04	2.28	1.36	40.4	1.92	15.6	1.00	56.3
2018 M05	2.40	1.33	44.6	2.00	16.7	0.92	61.8
2018 M06	2.26	1.28	43.4	2.00	11.5	0.91	59.6
2018 M07	2.41	1.31	45.8	1.70	29.6	0.93	61.4
2018 M08	2.10	1.21	42.5	1.66	21.1	0.92	56.1
2018 M09	1.93	1.20	37.9	1.97	(2.0)	0.90	53.4
2018 M10	1.85	1.17	36.8	---	---	0.91	50.8
2018 M11	1.90	1.23	35.4	---	---	0.93	51.2
2018 M12	1.93	1.17	39.6	---	---	0.90	53.6
2019 M01	1.95	1.16	40.6	1.35	30.6	0.90	53.6
2019 M02	1.82	1.18	35.1	1.99	(9.5)	0.94	48.3
2019 M03	1.89	1.17	37.8	---	---	0.89	52.8
2019 M04	2.29	1.18	48.4	---	---	0.87	61.9
2019 M05	2.06	1.18	42.6	1.68	18.7	0.83	60.0
2019 M06	2.02	1.16	42.5	1.18	41.6	0.82	59.7
2019 M07	1.93	1.16	40.0	1.18	38.8	0.81	58.0
2019 M08	1.89	1.17	38.4	1.19	37.1	0.81	57.3
2019 M09	1.78	1.09	38.8	1.18	33.8	0.80	55.4
2019 M10	1.73	1.13	34.7	1.10	36.6	0.84	51.4
2019 M11	1.85	1.15	37.8	1.00	45.9	0.79	57.3
2019 M12	1.76	1.12	36.1	1.24	29.7	0.81	54.0
2020 M01	1.82	1.14	37.1	1.37	24.6	0.85	53.3
2020 M02	1.50	1.16	22.9	1.37	8.9	0.82	45.5
2020 M03	1.55	1.15	25.8	0.99	36.5	0.79	49.4
2020 M04	2.00	1.18	41.3	0.98	51.0	0.80	60.3
2020 M05	1.64	1.18	28.5	0.97	41.2	0.78	52.5
2020 M06	1.75	1.28	27.0	0.99	43.3	0.79	54.8
2020 M07	1.72	1.27	26.5	0.98	43.4	0.81	53.2
2020 M08	1.82	1.25	31.6	---	---	0.76	58.5
2020 M09	1.71	1.26	26.6	0.94	45.0	0.76	55.8
2020 M10	1.75	1.31	25.3	1.24	29.1	0.77	56.2
2020 M11	1.66	1.31	21.0	---	---	0.75	55.0
2020 M12	1.65	1.42	14.2	---	---	0.72	56.4

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Table L-2 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 2, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2021 M01	1.67	1.40	16.3	1.48	11.3	0.73	56.3
2021 M02	1.62	1.42	12.3	1.83	(13.1)	0.93	42.9
2021 M03	1.78	1.42	20.2	1.79	(0.8)	0.99	44.4
2021 M04	1.80	1.69	6.0	1.83	(1.7)	1.03	42.8
2021 M05	1.57	1.85	(17.8)	1.79	(14.3)	1.03	34.6
2021 M06	1.93	1.85	4.2	1.78	7.8	1.03	46.8
2021 M07	2.04	1.83	10.4	---	---	1.09	46.6
2021 M08	2.29	1.86	18.6	---	---	1.13	50.8
2021 M09	2.27	1.86	18.0	---	---	1.21	46.6

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Table L-2 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 2, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2018 M01	2.02	---	---	---	---	1.45	28.2
2018 M02	2.00	---	---	---	---	1.36	31.8
2018 M03	2.23	---	---	---	---	1.47	34.3
2018 M04	2.28	---	---	---	---	1.32	42.1
2018 M05	2.40	1.09	54.5	---	---	1.37	42.9
2018 M06	2.26	1.09	51.7	---	---	1.35	40.1
2018 M07	2.41	1.09	54.7	---	---	1.21	49.8
2018 M08	2.10	1.09	48.2	---	---	1.16	44.8
2018 M09	1.93	---	---	---	---	1.51	21.8
2018 M10	1.85	1.03	44.4	---	---	1.04	44.0
2018 M11	1.90	---	---	---	---	1.13	40.7
2018 M12	1.93	---	---	---	---	0.99	48.9
2019 M01	1.95	0.93	52.2	---	---	1.05	46.1
2019 M02	1.82	---	---	---	---	1.37	24.6
2019 M03	1.89	---	---	---	---	1.03	45.3
2019 M04	2.29	1.01	55.8	---	---	1.02	55.4
2019 M05	2.06	0.93	54.9	---	---	1.19	42.5
2019 M06	2.02	0.93	54.0	---	---	1.01	50.0
2019 M07	1.93	0.93	51.8	---	---	1.01	47.8
2019 M08	1.89	---	---	---	---	1.03	45.7
2019 M09	1.78	---	---	---	---	0.97	45.8
2019 M10	1.73	---	---	---	---	1.01	41.8
2019 M11	1.85	0.95	48.6	---	---	1.01	45.5
2019 M12	1.76	---	---	---	---	1.06	39.9
2020 M01	1.82	0.97	46.6	---	---	1.10	39.5
2020 M02	1.50	0.91	39.8	---	---	1.07	28.6
2020 M03	1.55	0.91	41.6	---	---	1.00	35.8
2020 M04	2.00	0.93	53.8	---	---	0.97	51.6
2020 M05	1.64	0.92	44.0	---	---	0.92	43.7
2020 M06	1.75	0.93	46.8	---	---	0.96	45.4
2020 M07	1.72	0.94	45.7	---	---	0.96	44.4
2020 M08	1.82	0.93	49.2	---	---	0.98	46.4
2020 M09	1.71	0.89	48.2	---	---	0.96	43.9
2020 M10	1.75	---	---	---	---	1.10	36.9
2020 M11	1.66	0.92	44.4	---	---	1.07	35.3
2020 M12	1.65	0.85	48.5	---	---	1.00	39.7

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Table L-2 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 2, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2021 M01	1.67	0.90	46.1	---	---	1.18	29.2
2021 M02	1.62	0.95	41.2	---	---	1.25	22.8
2021 M03	1.78	0.85	52.1	---	---	1.32	25.7
2021 M04	1.80	1.02	43.3	---	---	1.38	23.2
2021 M05	1.57	0.91	42.2	---	---	1.46	6.8
2021 M06	1.93	0.96	50.1	---	---	1.41	26.6
2021 M07	2.04	---	---	---	---	1.46	28.5
2021 M08	2.29	---	---	---	---	1.49	34.7
2021 M09	2.27	---	---	---	---	1.60	29.4

Source: Compiled from USDA/AMS data, accessed November 23, 2021.
Note: Product 2: Extra light amber honey (35 – 50 mm).

Table L-3
Raw honey: Simple-average f.o.b. prices of domestic and imported product 3, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2018 M01	1.73	1.20	30.5	1.93	(11.5)	1.40	19.2
2018 M02	1.86	1.20	35.4	1.91	(2.6)	1.00	46.2
2018 M03	1.83	1.20	34.2	1.90	(4.1)	0.92	49.6
2018 M04	1.76	1.22	30.8	1.87	(6.5)	0.95	45.8
2018 M05	1.91	1.20	37.1	1.76	7.8	0.91	52.6
2018 M06	1.85	1.19	35.5	1.80	2.8	0.91	51.0
2018 M07	1.92	1.20	37.5	1.71	10.9	0.91	52.8
2018 M08	1.77	1.20	32.3	1.70	4.4	0.90	49.4
2018 M09	1.84	0.98	47.1	1.56	15.4	0.90	51.2
2018 M10	1.75	1.14	35.1	1.63	6.8	0.90	48.7
2018 M11	1.83	1.10	40.2	1.53	16.8	0.92	50.1
2018 M12	1.81	1.12	38.1	1.68	7.2	0.89	50.8
2019 M01	1.80	1.07	40.7	1.32	26.8	0.90	50.1
2019 M02	1.75	1.04	40.6	1.39	20.6	0.90	48.7
2019 M03	1.80	1.09	39.4	1.65	8.5	0.89	50.5
2019 M04	1.81	---	---	---	---	0.88	51.4
2019 M05	1.93	1.08	44.2	1.32	31.5	0.83	57.2
2019 M06	1.88	1.08	42.8	1.18	37.2	0.81	57.1
2019 M07	1.75	1.08	38.4	1.27	27.5	0.81	53.7
2019 M08	1.92	1.08	44.1	1.22	36.5	0.79	58.8
2019 M09	1.55	1.07	31.4	1.22	21.5	0.80	48.7
2019 M10	1.75	1.04	40.8	1.17	33.3	0.75	57.1
2019 M11	1.60	1.05	34.4	1.15	28.3	0.98	39.1
2019 M12	1.62	1.06	34.4	1.11	31.5	0.81	50.0
2020 M01	1.56	1.10	30.0	1.05	32.7	0.80	48.9
2020 M02	1.59	1.15	28.0	0.91	42.8	0.82	48.7
2020 M03	1.50	1.15	23.7	0.94	37.3	0.75	50.0
2020 M04	1.69	1.17	30.7	0.94	44.4	0.79	53.3
2020 M05	1.78	1.15	35.2	0.96	45.8	0.83	53.2
2020 M06	1.69	---	---	1.06	37.4	0.77	54.2
2020 M07	1.65	1.25	24.3	0.94	43.0	0.82	50.6
2020 M08	1.68	1.34	20.3	1.00	40.6	0.75	55.5
2020 M09	1.67	1.33	20.6	0.91	45.4	0.74	56.1
2020 M10	1.72	1.24	28.2	0.94	45.5	0.73	57.6
2020 M11	1.81	1.22	32.7	1.22	32.7	0.72	60.1
2020 M12	1.64	1.17	28.5	0.96	41.4	0.72	56.0

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Table L-3 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 3, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2021 M01	1.73	1.33	23.2	1.25	27.5	0.81	53.0
2021 M02	1.54	---	---	1.37	11.1	0.81	47.3
2021 M03	1.93	1.71	11.2	1.15	40.4	0.88	54.5
2021 M04	1.70	1.70	---	1.79	(5.3)	0.94	44.8
2021 M05	1.70	1.78	(4.5)	1.53	10.3	1.03	39.8
2021 M06	1.92	---	---	1.73	9.9	1.04	46.0
2021 M07	1.89	1.75	7.3	1.82	3.8	0.96	49.2
2021 M08	2.10	1.82	13.5	1.73	18.0	1.12	47.0
2021 M09	2.21	1.90	13.9	1.92	13.2	1.17	47.2

Table continued on next page.

Table L-3 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 3, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2018 M01	1.73	---	---	1.12	35.1	1.41	18.6
2018 M02	1.86	---	---	0.91	51.0	1.20	35.2
2018 M03	1.83	---	---	0.90	50.7	1.17	36.0
2018 M04	1.76	0.90	48.7	0.89	49.6	1.13	35.7
2018 M05	1.91	1.09	42.9	0.88	53.9	1.21	36.4
2018 M06	1.85	1.09	41.0	1.00	46.1	1.15	37.9
2018 M07	1.92	1.09	43.2	0.88	54.4	1.16	39.8
2018 M08	1.77	---	---	0.85	52.0	1.11	37.5
2018 M09	1.84	---	---	0.86	53.3	1.07	41.7
2018 M10	1.75	---	---	0.86	51.1	1.08	38.0
2018 M11	1.83	1.01	44.9	0.87	52.8	1.08	40.9
2018 M12	1.81	1.09	39.8	0.85	53.0	1.17	35.3
2019 M01	1.80	---	---	0.86	52.6	1.02	43.5
2019 M02	1.75	---	---	0.85	51.4	1.08	38.4
2019 M03	1.80	0.93	48.3	0.83	54.1	1.13	37.1
2019 M04	1.81	---	---	0.83	54.1	0.86	52.8
2019 M05	1.93	0.93	51.8	0.83	57.0	0.97	49.8
2019 M06	1.88	---	---	0.85	54.7	0.94	49.8
2019 M07	1.75	0.93	46.7	0.83	52.5	1.00	42.9
2019 M08	1.92	---	---	0.76	60.5	0.93	51.7
2019 M09	1.55	---	---	0.76	51.1	0.93	40.3
2019 M10	1.75	0.93	46.8	0.75	57.1	0.94	46.5
2019 M11	1.60	0.95	40.6	0.77	52.2	1.00	37.4
2019 M12	1.62	---	---	0.77	52.7	0.94	41.7
2020 M01	1.56	---	---	0.73	53.3	0.92	41.1
2020 M02	1.59	---	---	0.77	51.6	0.89	43.8
2020 M03	1.50	0.94	37.7	0.73	51.3	0.90	40.0
2020 M04	1.69	---	---	0.74	56.1	0.89	47.1
2020 M05	1.78	---	---	0.71	60.3	0.92	48.1
2020 M06	1.69	---	---	0.73	56.7	0.83	50.6
2020 M07	1.65	---	---	0.71	57.3	0.90	45.6
2020 M08	1.68	0.95	43.3	0.71	57.6	0.96	43.0
2020 M09	1.67	---	---	0.71	57.6	0.92	45.1
2020 M10	1.72	---	---	0.74	57.3	0.92	46.8
2020 M11	1.81	0.89	51.0	0.72	60.1	0.95	47.3
2020 M12	1.64	0.86	47.8	0.70	57.3	0.89	45.4

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Table L-3 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 3, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2021 M01	1.73	---	---	0.77	55.7	1.04	40.0
2021 M02	1.54	0.85	44.7	0.77	49.9	0.92	40.0
2021 M03	1.93	---	---	0.80	58.8	1.18	38.7
2021 M04	1.70	1.02	40.0	0.86	49.4	1.24	27.3
2021 M05	1.70	---	---	0.90	47.2	1.26	26.1
2021 M06	1.92	0.96	49.9	0.90	53.1	1.23	35.8
2021 M07	1.89	---	---	1.34	29.2	1.57	16.8
2021 M08	2.10	---	---	1.07	49.2	1.49	29.2
2021 M09	2.21	---	---	---	---	1.61	26.9

Source: Compiled from USDA/AMS data, accessed November 23, 2021.
Note: Product 3: Light amber honey (51 – 85 mm).

Table L-4
Raw honey: Simple-average f.o.b. prices of domestic and imported product 4, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2018 M01	---	---	---	1.88	---	1.07	---
2018 M02	1.60	---	---	1.89	(18.1)	---	---
2018 M03	2.00	---	---	1.89	5.5	1.07	46.5
2018 M04	---	---	---	---	---	---	---
2018 M05	1.70	---	---	1.67	1.8	---	---
2018 M06	---	---	---	1.67	---	---	---
2018 M07	---	---	---	---	---	---	---
2018 M08	---	---	---	1.67	---	---	---
2018 M09	1.62	---	---	---	---	---	---
2018 M10	1.90	---	---	1.67	12.1	---	---
2018 M11	1.63	---	---	1.67	(2.8)	---	---
2018 M12	1.45	---	---	---	---	---	---
2019 M01	1.80	---	---	1.25	30.6	---	---
2019 M02	---	---	---	1.25	---	---	---
2019 M03	1.55	---	---	1.25	19.4	---	---
2019 M04	---	---	---	---	---	---	---
2019 M05	0.70	---	---	---	---	---	---
2019 M06	0.91	---	---	---	---	0.76	16.3
2019 M07	1.68	---	---	---	---	0.73	56.4
2019 M08	1.86	---	---	1.17	37.0	0.76	59.1
2019 M09	1.96	---	---	1.17	40.4	---	---
2019 M10	1.34	---	---	---	---	---	---
2019 M11	1.76	---	---	1.17	33.4	---	---
2019 M12	1.63	---	---	---	---	---	---
2020 M01	1.80	---	---	0.89	50.8	---	---
2020 M02	1.60	---	---	0.84	47.5	0.78	51.3
2020 M03	1.65	---	---	0.97	41.2	---	---
2020 M04	1.60	1.15	28.1	0.89	44.5	---	---
2020 M05	1.82	---	---	0.95	47.8	---	---
2020 M06	1.66	---	---	0.94	43.3	---	---
2020 M07	1.57	---	---	---	---	---	---
2020 M08	1.90	---	---	0.90	52.9	---	---
2020 M09	1.69	1.30	22.8	---	---	---	---
2020 M10	1.65	1.27	22.9	---	---	---	---
2020 M11	1.72	1.50	12.9	0.85	50.6	---	---
2020 M12	1.58	1.18	25.1	0.86	45.7	---	---

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Table L-4 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 4, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Argentina price	Argentina margin	Brazil price	Brazil margin	India price	India margin
2021 M01	1.78	1.45	18.3	1.57	11.5	---	---
2021 M02	1.50	---	---	1.30	13.3	---	---
2021 M03	1.84	---	---	---	---	---	---
2021 M04	1.94	---	---	1.30	33.0	1.19	38.6
2021 M05	2.05	---	---	1.84	10.2	---	---
2021 M06	---	---	---	1.84	---	1.00	---
2021 M07	2.00	---	---	---	---	---	---
2021 M08	2.27	---	---	1.75	22.9	---	---
2021 M09	2.16	---	---	---	---	1.19	45.0

Table continued on next page.

Table L-4 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 4, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2018 M01	---	---	---	0.95	---	1.30	---
2018 M02	1.60	---	---	0.85	47.2	1.37	14.5
2018 M03	2.00	---	---	1.00	50.3	1.32	34.1
2018 M04	---	---	---	0.81	---	0.81	---
2018 M05	1.70	---	---	---	---	1.67	1.8
2018 M06	---	---	---	---	---	1.67	---
2018 M07	---	---	---	0.68	---	0.68	---
2018 M08	---	---	---	---	---	1.67	---
2018 M09	1.62	---	---	0.68	57.9	0.68	57.9
2018 M10	1.90	---	---	0.68	64.2	1.18	38.1
2018 M11	1.63	---	---	0.68	58.2	1.18	27.7
2018 M12	1.45	---	---	0.68	53.1	0.68	53.1
2019 M01	1.80	---	---	0.68	62.2	0.97	46.4
2019 M02	---	---	---	---	---	1.25	---
2019 M03	1.55	---	---	---	---	1.25	19.4
2019 M04	---	---	---	0.75	---	0.75	---
2019 M05	0.70	---	---	0.75	(7.1)	0.75	(7.1)
2019 M06	0.91	---	---	0.72	20.7	0.74	18.5
2019 M07	1.68	---	---	---	---	0.73	56.4
2019 M08	1.86	---	---	0.67	63.9	0.87	53.3
2019 M09	1.96	---	---	0.71	63.8	0.94	52.1
2019 M10	1.34	---	---	0.68	49.2	0.68	49.2
2019 M11	1.76	---	---	0.69	60.7	0.93	47.0
2019 M12	1.63	---	---	0.66	59.7	0.66	59.7
2020 M01	1.80	---	---	0.67	62.8	0.81	54.8
2020 M02	1.60	---	---	0.66	59.1	0.76	52.6
2020 M03	1.65	---	---	---	---	0.97	41.2
2020 M04	1.60	---	---	---	---	0.98	39.1
2020 M05	1.82	---	---	---	---	0.95	47.8
2020 M06	1.66	---	---	---	---	0.94	43.3
2020 M07	1.57	---	---	---	---	---	---
2020 M08	1.90	---	---	0.66	65.3	0.82	57.0
2020 M09	1.69	---	---	0.66	60.8	0.98	41.8
2020 M10	1.65	---	---	---	---	1.27	22.9
2020 M11	1.72	---	---	---	---	1.18	31.8
2020 M12	1.58	---	---	---	---	0.96	38.8

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Table L-4 continued
Raw honey: Simple-average f.o.b. prices of domestic and imported product 4, and margins of underselling/(overselling), by month

Price in dollars per pound, margin in percent

Period	U.S. price	Ukraine price	Ukraine margin	Vietnam price	Vietnam margin	Subject price	Subject margin
2021 M01	1.78	---	---	---	---	1.51	14.9
2021 M02	1.50	---	---	---	---	1.30	13.3
2021 M03	1.84	---	---	---	---	---	---
2021 M04	1.94	---	---	---	---	1.26	34.9
2021 M05	2.05	---	---	---	---	1.84	10.2
2021 M06	---	---	---	---	---	1.42	---
2021 M07	2.00	---	---	---	---	---	---
2021 M08	2.27	---	---	0.97	57.3	1.36	40.1
2021 M09	2.16	---	---	1.10	49.4	1.14	47.2

Source: Compiled from USDA/AMS data, accessed November 23, 2021.
Note: Product 4: Amber honey (greater than 86 mm).

APPENDIX M

FINANCIAL RESULTS EXCLUDING ***

Table M-1 presents the raw honey operations of all U.S. producers excluding U.S. producers ***, and table M-2 presents the corresponding changes in average unit values.

Table M-1
Raw honey: Results of operations of all U.S. producers excluding *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
Operating expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
All other expenses	Value	***	***	***
Insurance/government program income	Value	***	***	***
All other income	Value	***	***	***
Net income or (loss)	Value	***	***	***
Operating expenses	Ratio to NS	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***
All other expenses	Ratio to NS	***	***	***
Insurance/government program income	Ratio to NS	***	***	***
All other income	Ratio to NS	***	***	***
Net income or (loss)	Ratio to NS	***	***	***
Total net sales	Unit value	***	***	***
Operating expenses	Unit value	***	***	***
Operating income or (loss)	Unit value	***	***	***
All other expenses	Unit value	***	***	***
Insurance/government program income	Unit value	***	***	***
All other income	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.

Table M-2
Raw honey: Changes in AUVs for all U.S. producers excluding * between comparison periods**

Unit values in dollars per pound

Item	Changes Measured In	2018-20	2018-19	2019-20
Total net sales	Percent	***	***	***
Operating expenses	Percent	***	***	***
Total net sales	Unit value	***	***	***
Operating expenses	Unit value	***	***	***
Operating income or (loss)	Unit value	***	***	***
All other expenses	Unit value	***	***	***
Insurance/government program income	Unit value	***	***	***
All other income	Unit value	***	***	***
Net income or (loss)	Unit value	***	***	***

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

Table M-3 presents the raw honey operations of all large U.S. producers excluding U.S. producers ***, and table M-4 presents the corresponding changes in average unit values.

Table M-3
Raw honey: Results of operations of large U.S. producers excluding *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
Operating expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
Insurance/government program income	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
Operating expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
All other expenses	Ratio to NS	***	***	***	***	***
Insurance/government program income	Ratio to NS	***	***	***	***	***
All other income	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
Operating expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
All other expenses	Unit value	***	***	***	***	***
Insurance/government program income	Unit value	***	***	***	***	***
All other income	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.

Table M-4
Raw honey: Changes in AUVs for large U.S. producers excluding * between comparison periods**

Unit values in dollars per pound

Item	Changes Measured In	2018-20	2018-19	2019-20	Jan-Sep 2020-21
Total net sales	Percent	***	***	***	***
Operating expenses	Percent	***	***	***	***
Total net sales	Unit value	***	***	***	***
Operating expenses	Unit value	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***
All other expenses	Unit value	***	***	***	***
Insurance or government program income	Unit value	***	***	***	***
All other income	Unit value	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***

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

Note: Unit values shown as "(0.00)" represent values less than “0.00” but more than "(0.005)."

APPENDIX N

ALTERNATIVE FINANCIAL RESULTS

Tables N-1 and N-2 present the raw honey operations of all U.S. producers and large U.S. producers, respectively, excluding U.S. producers ***.

Table N-1
Raw honey: Results of operations of all U.S. producers excluding *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
Operating expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
All other expenses	Value	***	***	***
Insurance/government program income	Value	***	***	***
All other income	Value	***	***	***
Net income or (loss)	Value	***	***	***
Operating expenses	Ratio to NS	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***
All other expenses	Ratio to NS	***	***	***
Insurance/government program income	Ratio to NS	***	***	***
All other income	Ratio to NS	***	***	***
Net income or (loss)	Ratio to NS	***	***	***
Total net sales	Unit value	***	***	***
Operating expenses	Unit value	***	***	***
Operating income or (loss)	Unit value	***	***	***
All other expenses	Unit value	***	***	***
Insurance/government program income	Unit value	***	***	***
All other income	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.

Table N-2
Raw honey: Results of operations of large U.S. producers excluding *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
Operating expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
Insurance/government program income	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Operating expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
All other expenses	Ratio to NS	***	***	***	***	***
Insurance/government program income	Ratio to NS	***	***	***	***	***
All other income	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
Operating expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
All other expenses	Unit value	***	***	***	***	***
Insurance/government program income	Unit value	***	***	***	***	***
All other income	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.

Tables N-3 and N-4 present the raw honey operations results of all U.S. producers and large U.S. producers, respectively, with adjustments made to the financial data reported by *** to estimate what the industry's results would have been had these companies sold the amount of raw honey they produced in each period. The companies' data were adjusted by using reported production in each period for the total net sales quantities, while their total net sales values were calculated based on the amount of honey produced multiplied by their net sales AUVs (calculated from submissions prior to adjustments) for each period.[1] Since a company's relative sales revenue was used to allocate its shared operating expenses, changing the companies' sales revenues also resulted in changes to operating expenses.

[1] ***.

Table N-3
Raw honey: Estimated results of operations of all U.S. producers with adjustments made to the data reported by *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
Operating expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
All other expenses	Value	***	***	***
Insurance/government program income	Value	***	***	***
All other income	Value	***	***	***
Net income or (loss)	Value	***	***	***
Operating expenses	Ratio to NS	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***
All other expenses	Ratio to NS	***	***	***
Insurance/government program income	Ratio to NS	***	***	***
All other income	Ratio to NS	***	***	***
Net income or (loss)	Ratio to NS	***	***	***
Total net sales	Unit value	***	***	***
Operating expenses	Unit value	***	***	***
Operating income or (loss)	Unit value	***	***	***
All other expenses	Unit value	***	***	***
Insurance/government program income	Unit value	***	***	***
All other income	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.

Table N-4
Raw honey: Estimated results of operations of large U.S. producers with adjustments made to the data reported by *, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
Operating expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
Insurance/government program income	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Operating expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
All other expenses	Ratio to NS	***	***	***	***	***
Insurance/government program income	Ratio to NS	***	***	***	***	***
All other income	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
Operating expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
All other expenses	Unit value	***	***	***	***	***
Insurance/government program income	Unit value	***	***	***	***	***
All other income	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.

APPENDIX O

EXPANDED DOMESTIC LIKE PRODUCT FINANCIAL RESULTS

Tables O-1 and O-2 show select financial results of within-scope raw honey and out-of-scope honey packaged for retail sale for all U.S. producers and large U.S. producers, respectively.[1]

Table O-1
Expanded like product: Results of operations of all U.S. producers for raw honey and the incremental value of raw honey packaged for retail sale, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound

Item	Measure	2018	2019	2020
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
Operating expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Operating expenses	Ratio to NS	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***
Total net sales	Unit value	***	***	***
Operating expenses	Unit value	***	***	***
Operating income or (loss)	Unit value	***	***	***

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

Table O-2
Expanded like product: Results of operations of large U.S. producers for raw honey and the incremental value of raw honey packaged for retail sale, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; unit values in dollars per pound

Item	Measure	2018	2019	2020	Jan-Sep 2020	Jan-Sep 2021
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
Operating expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Operating expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
Operating expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***

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

[1] Only the sales quantity of honey packaged for retail sale was collected from small U.S. producers. U.S. producers' questionnaire responses, section II-3. Therefore, the incremental value of sales and operating expenses were calculated from the large U.S. producers' reported data, and were applied to the corresponding quantities of reported sales.

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