Certain Preserved Mushrooms from France

Investigation No. 731-TA-1587 (Final)

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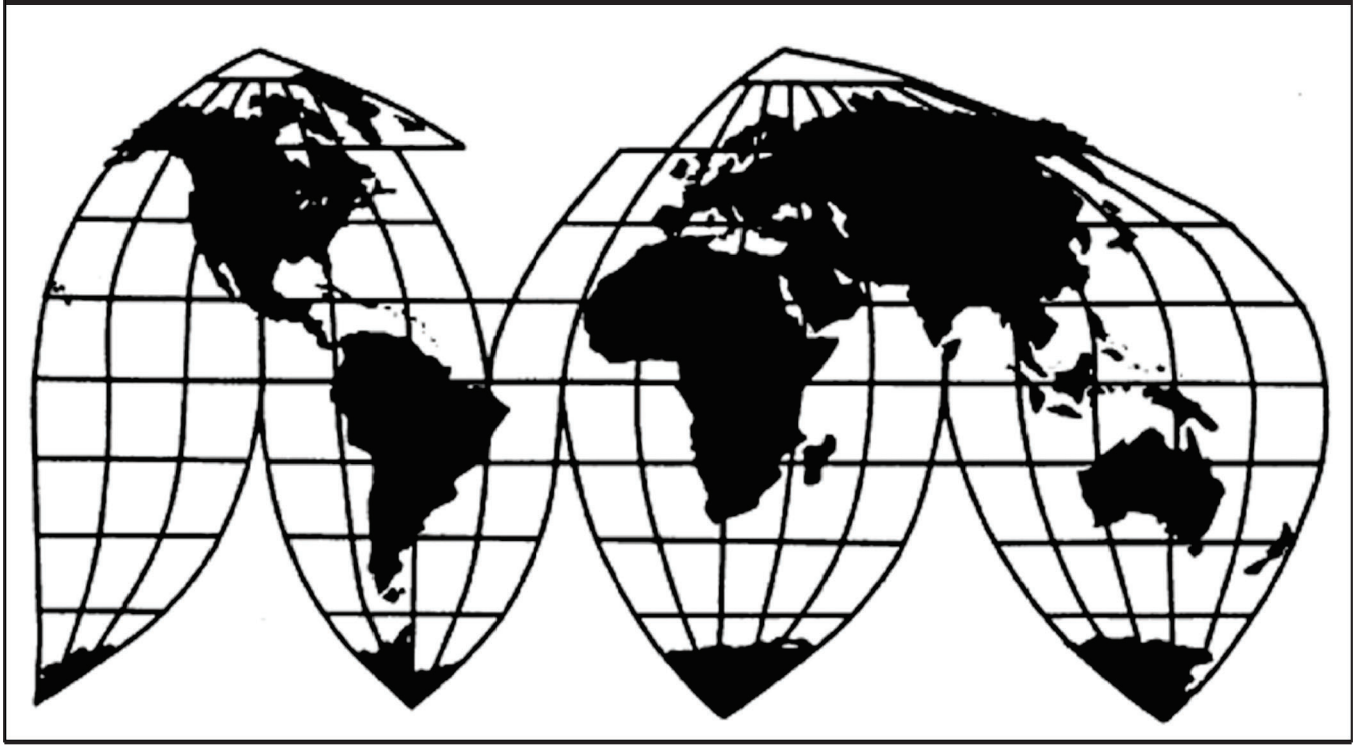
U.S. International Trade Commission



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U.S. International Trade Commission

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1587 (Final)

Certain Preserved Mushrooms from France

DETERMINATION

On the basis of the record[1] developed in the subject investigation, 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 certain preserved mushrooms from France, provided for in subheading 2003.10.01 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]

BACKGROUND

The Commission instituted this investigation effective March 31, 2022, following receipt of petitions filed with the Commission and Commerce by Giorgio Foods, Inc., Blandon, Pennsylvania. The Commission scheduled the final phase of the investigation following notification of a preliminary determination by Commerce that imports of certain preserved mushrooms from France were being sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigation 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 September 21, 2022 (*87 FR 57717*). The Commission conducted its hearing on November 17, 2022. All persons who requested the opportunity were permitted to participate.

[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 72963 (November 28, 2022).

Views of the Commission

Based on the record in the final phase of this investigation, we determine that an industry in the United States is materially injured by reason of imports of certain preserved mushrooms ("CPMs") from France found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value.

I. Background

A. Parties to the Investigation

Giorgio Foods, Inc. ("Giorgio" or "Petitioner"), a domestic producer of CPMs, filed antidumping duty petitions on imports of CPMs from France, the Netherlands, Poland, and Spain on March 31, 2022.[1] The investigation schedules became staggered when Commerce did not postpone the final determination for its antidumping duty investigation regarding CPMs from France while it did postpone the final determinations for its antidumping duty investigations regarding CPMs from the Netherlands, Poland, and Spain. As a result, the Commission must issue an earlier determination in the antidumping duty investigation on CPMs from France (the "leading investigation") than in the antidumping duty investigations on CPMs from the Netherlands, Poland, and Spain (the "trailing investigations").[2] Pursuant to the statutory provision on staggered investigations, the record for the trailing investigations will be

[1] Confidential Report, Memorandum INV-UU-122 (Dec. 9, 2022) ("CR") at I-1; Public Report, *Certain Preserved Mushrooms from France*, Inv. No. 731-TA-1587 (Final), USITC Pub. 5393 (Jan. 2023) ("PR") at I-1.

[2] Commerce has postponed making its final determinations in the trailing investigations to no later than March 20, 2023. *Certain Preserved Mushrooms from the Netherlands: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 87 Fed. Reg. 66265 (Nov. 3, 2022); *Certain Preserved Mushrooms from Poland: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 87 Fed. Reg. 66273 (Nov. 3, 2022); *Certain Preserved Mushrooms from Spain: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 87 Fed. Reg. 66262 (Nov. 3, 2022). As Commerce's preliminary determinations in the trailing investigations were affirmative, the Commission's final determinations in the trailing investigations must be made no later than 45 days after Commerce's final determinations in those investigations, or May 4, 2023. 19 U.S.C. § 1673d(b)(2).

the same as the record for the leading investigation,[3] except that, prior to the Commission's determinations in the trailing investigations, the Commission shall include in the record Commerce's final dumping determinations and the parties' final comments concerning those determinations.[4]

Petitioner appeared at the hearing and submitted prehearing and posthearing briefs and final comments. Respondents Okechamp B.V., Okechamp S.A., Prochamp B.V., and Eurochamp S.A.T. (collectively, the "Okechamp Respondents"), producers of subject merchandise in the Netherlands, Poland, and Spain, appeared at the hearing and submitted joint prehearing and posthearing briefs. Respondent H-E-B Grocery Company LP ("HEB"), a U.S. purchaser of subject merchandise from the Netherlands, likewise appeared at the hearing and submitted prehearing and posthearing briefs.[5]

B. Data Coverage

The period of investigation ("POI") is January 2019 through June 2022. U.S. industry data are based on the questionnaire response of one firm, Giorgio, which accounted for the vast majority of U.S. CPM production in 2021.[6] The U.S. import data in the record include both official Commerce import statistics[7] and the questionnaire responses of 17 U.S. importers accounting for virtually all subject imports from France, *** percent of subject imports from the

[3] In its preliminary antidumping duty determination concerning CPMs from the Netherlands, Commerce calculated a zero percent dumping margin for producer Prochamp B.V. ("Prochamp"), which means that CPMs imported from Prochamp in the Netherlands are nonsubject imports for purposes of the Commission's determination in the leading investigation. *See Certain Preserved Mushrooms from the Netherlands: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 87 Fed. Reg. 66265 (Nov. 3, 2022). If, in its final determination concerning CPMs from the Netherlands, Commerce calculates a non-*de minimis* margin for Prochamp, the record in the trailing investigations would differ from the record in the leading investigation in that subject imports from the Netherlands would include imports from Prochamp.

[4] 19 U.S.C. § 1677(7)(G)(iii).

[5] Additionally, a representative from the Delegation of the European Union appeared at the hearing in opposition to the imposition of antidumping duties and submitted a posthearing statement.

[6] CR/PR at I-4. The Commission issued U.S. producer questionnaires to five firms, based on information contained in the petitions. Of these, only Giorgio provided usable data on its operations. *Id*. at III-1. Of the four other firms, two indicated that they had not produced CPMs during the POI, and two, *** and ***, indicated that they had wholly or largely ceased producing CPMs during the POI. *Id*. at III-1, nn.1, 2. Specifically, *** indicated that it ceased producing CPMs in 2019 – *id*. at III-1, n.2 – and *** indicated that it ceased (or largely ceased) producing CPMs in 2021. *Id*. at III-1, n.1.

[7] These official import statistics cover HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 (mushrooms of the genus *Agaricus*, prepared or preserved otherwise than by vinegar or acetic acid, in containers holding not more than 255 grams). *See* CR/PR at I-4 and Appendix D.

Netherlands,[8] virtually all subject imports from Poland, and *** percent of subject imports from Spain during the POI.[9] The Commission received responses to its questionnaire from four foreign producers of subject merchandise, including one producer/exporter in France accounting for approximately *** percent of subject imports from France in 2021,[10] one producer/exporter in the Netherlands accounting for approximately *** percent of subject imports from the Netherlands in 2021,[11] one producer/exporter in Poland accounting for approximately *** percent of subject imports from Poland in 2021,[12] and one producer/exporter in Spain accounting for approximately *** percent of subject imports from Spain in 2021.[13]

C. Import Data Issues

Giorgio argues that the Commission should rely on official import statistics rather than U.S. importers' questionnaire responses for import data. It contends that official import statistics comprehensively capture in-scope imports, whereas the questionnaire responses allegedly understate them, and emphasizes that the Commission has relied on official import statistics in past CPM proceedings.[14] Counsel for the Okechamp Respondents argued at the hearing that, while the Commission should ideally rely exclusively on the questionnaire responses, the Commission should at the least consider these responses if it elects to rely on official import statistics.[15]

[8] As previously discussed, Commerce has preliminarily determined a zero percent dumping margin for Prochamp. *See Certain Preserved Mushrooms from the Netherlands: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional* Measures, 87 Fed. Reg. 66265 (Nov. 3, 2022). Accordingly, the Commission has classified imports from Prochamp in its Report as "Netherlands, nonsubject," and all other imports from the Netherlands as "Netherlands, subject." *See* CR/PR at IV-2 and Appendix D.

[9] CR/PR at I-4 & IV-1-2. These percentages are the ratio of import quantities reported in questionnaires compared to the quantities reported in official import statistics for the three HTS statistical reporting numbers described above.

[10] CR/PR at VII-3.

[11] CR/PR at VII-7. In addition to the response from the subject producer/exporter in the Netherlands, the Commission also received a response from Prochamp. Prochamp's foreign producer data are separately presented at CR/PR Appendix G.

[12] CR/PR at VII-15.

[13] CR/PR at VII-23.

[14] Petitioner's Prehearing Br. at 20-28.

[15] Hearing Transcript ("Tr.") at 189 (Levinson).

We rely primarily on U.S. importers' questionnaire responses for import data, while also considering official import statistics as appropriate.[16] While we recognize that the Commission has relied on official import statistics in past investigations of CPMs, we give more weight to the questionnaire data in this investigation for several reasons. First, as discussed in Section I.B. above, the importer questionnaire responses account for the vast majority of subject imports from each subject source.[17] Second, there are some questions about the reliability of the quantity data recorded for imports of CPMs in the official import statistics. In particular, with respect to subject imports from the Netherlands (which account for the greatest difference between import quantities as reflected in the questionnaires and official import statistics), official import statistics show average unit values ("AUVs") decreasing from 2019 to 2021, which is inconsistent with the AUV trends shown in the Commission's pricing data as well those calculated based on reported quantities and values in the importer questionnaire responses.[18] Moreover, we observe that the import data from the importers' questionnaire responses align more closely with the U.S. export data from the foreign producers' questionnaire responses than do official import statistics.[19] Third, by relying on questionnaire responses, the

[16] Chairman David S. Johanson relies primarily on official import statistics as he finds that the relevant HTS statistical reporting numbers appear to cover only subject merchandise (CR/PR at I-4) and that questionnaire coverage is less than complete. As discussed in the staff report, "purchaser ***." As a result, ***. CR/PR at II-2 n.4. ***, leading to some uncertainty regarding the completeness of questionnaire data. *See* Petitioner Responses to Commissioners' questions at 2. Comparing the two sets of data, Chairman Johanson finds it notable that for 2019 and 2020, the total quantity of subject imports was fairly close under both methods (official import statistics registered *** percent lower than questionnaire data in 2019 and *** percent lower in 2020), but in 2021, official import statistics were *** percent higher, and in interim 2022, they were *** percent higher. *Compare* CR/PR at Table IV-2 *with* Table D-2. This increasing discrepancy is not explained by inventories held by U.S. importers, which declined over the three full years of the period, from 4.9 million pounds in 2019 to 4.5 million pounds in 2021; inventories held by U.S. importers in interim 2022 were 5.8 million pounds, higher than in interim 2021 when such inventories were 3.0 million pounds. CR/PR at Table VII-24.

[17] We note that some of the missing questionnaire responses noted by Giorgio in its prehearing brief have been resolved by subsequent submissions. While, at the time the prehearing briefs were filed, the Commission had not received importer questionnaire responses from ***, *see* Petitioner's Prehearing Br. at 20, the Commission subsequently received responses from the latter two entities, and ***. CR/PR at IV-1 n.2.

[18] *See* CR/PR at Tables IV-2 and D-1.

[19] For example, the 2021 volume of subject imports from the Netherlands reported in the importer questionnaires, 22.8 million pounds, is closer to the 2021 volume of subject exports from the Netherlands reported in the foreign producer questionnaires, *** pounds, than is the 2021 volume of subject imports from the Netherlands derived from official import statistics, *** pounds. *See* CR/PR at Tables IV-2, VII-2 & D-1.

Commission can derive apparent U.S. consumption and market shares using U.S. importers' reported U.S. shipments.[20]

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."[21] 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 the product."[22] 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."[23]

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.[24] 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."[25] The Commission then defines the domestic like product

[20] Using U.S. import statistics to derive market share data may overstate the market shares held by subject and nonsubject imports, as it may count towards their shares of the U.S. market imports that are not actually shipped to the U.S. market during the year of importation, but rather are held in importers' inventories. This is particularly a concern under the facts of this investigation, as U.S. importers sold the majority of their commercial shipments from U.S. inventories. CR/PR at II-16.

[21] 19 U.S.C. § 1677(4)(A).

[22] 19 U.S.C. § 1677(4)(A).

[23] 19 U.S.C. § 1677(10).

[24] 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).

[25] *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, 949 F.3d 710, 717 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce's subject merchandise in reaching its own like product determination).

in light of the imported articles Commerce has identified.[26] 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.[27] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[28] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[29]

B. Scope Definition

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

> {C}ertain preserved mushrooms, whether imported whole, sliced, diced, or as stems and pieces. The preserved mushrooms covered under these investigations are the genus *Agaricus.* "Preserved mushrooms" refer to mushrooms that have been prepared or preserved by cleaning, blanching, and sometimes slicing or cutting. These mushrooms are then packed and heat sterilized in containers each holding a net drained weight of not more than 12 ounces (340.2 grams), including but not limited to cans or glass jars, in a suitable liquid medium, including but not limited to water, brine, butter, or butter sauce. Preserved mushrooms may be imported whole, sliced, diced, or as stems and pieces.

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[26] *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).

[27] *See*, *e.g.*, *Cleo*, 501 F.3d at 1299; *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*, 747 F. Supp. at 749 n.3 ("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).

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

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

> Excluded from the scope are "marinated," "acidified," or "pickled" mushrooms, which are prepared or preserved by means of vinegar or acetic acid, but may contain oil or other additives. To be prepared or preserved by means of vinegar or acetic acid, the merchandise must be a minimum 0.5 percent by weight acetic acid.[30]

CPMs are a type of processed mushroom product made from fresh mushrooms in the genus *Agaricus*. CPMs, typically white button but also brown crimini or portabella, are packed in cans or jars with water, brine, or butter and sterilized using high temperatures. The mushrooms can be preserved whole, sliced, or as stems and pieces; the main form of CPMs in the U.S. market is stems and pieces. CPMs are typically used as ingredients in various food products, including sauces, soups, pizzas, and gravies. The scope of this investigation covers only CPMs in cans and jars containing not more than 12 ounces (340.2 grams), which are typically sold to retailers in 4-ounce and 8-ounce cans and 4.5-ounce and 6-ounce jars. Jarred CPMs are generally of a higher quality than canned CPMs.[31]

C. Domestic Like Product Analysis

In its preliminary determinations, the Commission found that all CPMs corresponding to the scope were produced from the same genus of fresh mushrooms, had significant similarities in terms of physical characteristics such as flavor and shelf life, were generally produced through the same production processes at the same facilities by the same employees, were generally interchangeable, and were overwhelmingly sold through the same channels of distribution, albeit at appreciably varying prices.[32] Noting that no party had argued for a domestic like product definition broader than the scope definition, the Commission found that there were substantial differences between in-scope CPMs (which are typically sold in containers of 8 ounces or less) and out-of-scope CPMs (which are typically sold in 64 or 68 ounce containers), and that in-scope CPMs were mostly sold to retailers (*e.g.*, grocery stores), whereas out-of-scope CPMs were mostly sold to industrial users (*e.g.*, restaurants).[33]

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[30] *Certain Preserved Mushrooms from France: Final Affirmative Determination of Sales at Less Than Fair Value*, 87 Fed. Reg. 72963, 72964 (Nov. 28, 2022).

[31] CR/PR at I-9.

[32] *Certain Preserved Mushrooms from France, Netherlands, Poland, and Spain*, Inv. Nos. 731-TA-1587-1590 (Preliminary), USITC Pub. 5329 (May 2022) ("Preliminary Determinations") at 8-12.

[33] Preliminary Determinations at 8-12.

Accordingly, the Commission defined a single domestic like product consisting of CPMs, coextensive with the scope of the investigations.[34]

The record of the final phase of the investigation contains no new information or argument that would warrant the Commission's reconsideration of its domestic like product definition from the preliminary phase of the investigations. Accordingly, we again define a single domestic like product consisting of all domestically produced CPMs, coextensive with the scope.

III. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[35] 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.

Giorgio argues that the Commission should define the domestic industry as comprising all U.S. producers of CPMs.[36] Petitioner contends that, in addition to Giorgio, the domestic industry also includes *** and ***, as both firms ***.[37] Respondents do not address the issue.

[34] Preliminary Determinations at 12. In defining a single domestic like product, the Commission recognized that in prior CPM investigations, it had defined single domestic like products coextensive with the scopes in those prior proceedings, which, unlike the scope in the current proceedings, did not include a container size limitation. *See Id*. at 12, n.60 (citing *Certain Preserved Mushrooms from Chile*, Inv. No. 731-TA-776 (Final), USITC Pub. 3144 (Nov. 1998) at 3-6 and *Certain Preserved Mushrooms from China, India, and Indonesia*, Inv. Nos. 731-TA-777-779 (Final), USITC Pub. 3159 (Feb. 1999) at 3-5). However, the Commission observed that its domestic like product analysis must start with the scope of the investigation as determined by Commerce (which in this case includes a container size limitation), and that the evidentiary record in these investigations is different than the records in those prior proceedings. *Id*. The Commission also noted that no respondent had objected to Petitioner's proposed definition of the domestic like product as coextensive with the scope of the investigations. *Id*.

[35] 19 U.S.C. § 1677(4)(A).

[36] Petitioner's Prehearing Br. at 5-6.

[37] Petitioner's Prehearing Br. at 5.

There are no related party issues in the final phase of the investigation.[38] The investigation also does not raise any other domestic industry issues.[39] Consequently, and in light of our definition of the domestic like product, we define the domestic industry as all U.S. producers of CPMs.[40]

[38] Giorgio *** import or purchase subject CPMs, and *** to any subject exporter or importer. *See* CR/PR at III-2. *** does not import or purchase subject CPMs, and is not related to any subject exporter or importer. *See* *** partial preliminary phase U.S. Producer Questionnaire Response at I-6-7 and II-12-14. While there is no information on the record regarding whether *** is subject to possible exclusion under the related parties provision, there are no data from this firm to include or exclude from domestic industry data because the firm did not complete a questionnaire response. *See* CR/PR at III-1.

[39] In cases involving processed agricultural products, section 771(4)(E) of the Tariff Act authorizes the Commission to include growers of a raw agricultural input within the domestic industry producing the processed agricultural product if: (a) the processed agricultural product is produced from the raw product through a single continuous line of production, and (b) there is a substantial coincidence of economic interest between the growers and producers of the processed product based upon the relevant economic factors. 19 U.S.C. § 1677(4)(E)(i). No party has argued for the inclusion of mushroom growers in the domestic industry pursuant to the grower/processor provision.

The first prong of the grower/processor provision is not satisfied because fresh mushrooms are not substantially or completely devoted to the production of CPMs. Between 2019 and 2021, only between seven and 17 percent of total annual domestic fresh mushroom production was processed into CPMs – CR/PR at I-10 – and the Commission has previously found that the processing of significantly higher percentages of raw agricultural production did not satisfy the first prong of the grower/processor provision. *See*, *e.g.*, *Dried Tart Cherries from Turkey*, Inv. Nos. 701-TA-622 & 731-TA-1428 (Final), USITC Pub. 5014 (Jan. 2020) at 8-9 (first prong not met where approximately 25 to 35 percent of raw tart cherries were processed into dried tart cherries); *Certain Processed Hazelnuts from Turkey*, Inv. No. 731-TA-1057 (Preliminary), USITC Pub. 3656 (Dec. 2003) at 10 (first prong not met where 35 percent of in-shell hazelnuts were transformed into processed hazelnuts). Accordingly, given that this first of two necessary provisions is not satisfied, we do not include mushroom growers in the domestic industry.

[40] Whether *** and/or *** are considered part of the domestic industry based on their CPM production during the POI, as Petitioner argues they should be, does not affect the domestic industry data in this investigation, as neither firm submitted usable data. CR/PR at III-1.

IV. Cumulation[41]

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

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

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

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

(4) whether the subject imports are simultaneously present in the market.[42]

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

[41] 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 three 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 generally be deemed negligible. 19 U.S.C. §§ 1673d(b), 1677(24)(A)(i).

During the most recent 12-month period preceding the filing of the petitions in these investigations (March 2021 through February 2022), subject imports from France accounted for *** percent of total imports, subject imports from the Netherlands accounted for 60.9 percent of total imports, subject imports from Poland accounted for 16.6 percent of total imports, and subject imports from Spain accounted for *** percent of total imports. CR/PR at Table IV-3. As imports from each subject country exceed the 3 percent negligibility threshold applicable to antidumping duty investigations, we find that subject imports from each country are not negligible.

[42] *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).

determining whether the subject imports compete with each other and with the domestic like product.[43] Only a "reasonable overlap" of competition is required.[44]

A. Arguments of the Parties

Giorgio argues that the Commission should cumulate imports from all subject countries as it did in the preliminary determinations because the petitions were filed on the same day and there is a reasonable overlap of competition between and among the domestic like product and imports from each subject country. Specifically, it contends that subject imports from each source and the domestic like product are fungible, share common channels of distribution, are sold in overlapping geographic regions, and were simultaneously present throughout the POI.[45] Respondents do not address cumulation.

B. Analysis

We consider subject imports from France, the Netherlands, Poland, and Spain on a cumulated basis because the statutory criteria for cumulation are satisfied. As an initial matter, Petitioner filed each of the antidumping duty petitions on the same day, March 31, 2022.[46] There is also a reasonable overlap of competition between and among subject imports from each source and the domestic like product, as discussed below.

Fungibility. *** reported that domestically produced CPMs are *** interchangeable with imports from each subject country and that imports from each subject country are always interchangeable with each other.[47] Similarly, with few exceptions, majorities of responding importers and purchasers, when comparing the domestic like product with imports from each subject country and when comparing imports from each subject country with each other,

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

[44] 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.").

[45] Petitioner's Prehearing Br. at 6-14.

[46] CR/PR at I-1.

[47] CR/PR at Table II-11.

reported that these products are always or frequently interchangeable.[48]

Moreover, the domestic like product and subject imports from each source overlap with respect to both container size and type. A majority of the domestically produced CPMs sold in 2021 were in four-ounce cans, as were a majority or plurality of the subject imported CPMs from each source sold that year.[49] Likewise, a substantial percentage of the domestically produced CPMs sold in 2021 were in eight-ounce cans, as were a substantial percentage of the subject imported CPMs from each source sold that year.[50]

Consistent with the foregoing, the quarterly pricing data also indicate that domestically produced and subject imported CPMs from each source overlap with respect to product type.

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[48] CR/PR at Tables II-12-13. In comparing the domestic like product with subject imports from France, two of three U.S. importers reported that they were always or frequently interchangeable, and the only responding U.S. purchaser reported that they were frequently interchangeable. *Id*.

In comparing the domestic like product with subject imports from the Netherlands, seven of nine U.S. importers reported that they were always or frequently interchangeable, and four of four U.S. purchasers reported that they were frequently interchangeable. CR/PR at Tables II-12-13.

In comparing the domestic like product with subject imports from Poland, two of three U.S. importers reported that they were always or frequently interchangeable, and two of two U.S. purchasers reported that they were frequently interchangeable. CR/PR at Tables II-12-13.

In comparing the domestic like product with subject imports from Spain, one of three U.S. importers reported that they were always interchangeable (and two of three reported that they were sometimes or never interchangeable), while the only responding U.S. purchaser reported that they were frequently interchangeable. CR/PR at Tables II-12-13.

In comparing subject imports from France with subject imports from the Netherlands, five of seven U.S. importers reported that they were always or frequently interchangeable, and two of three U.S. purchasers reported that they were always or frequently interchangeable. CR/PR at Tables II-12-13.

In comparing subject imports from France with subject imports from Poland, three of five U.S. importers reported that they were always or frequently interchangeable, and two of three U.S. purchasers reported that they were always or frequently interchangeable. CR/PR at Tables II-12-13.

In comparing subject imports from France with subject imports from Spain, two of four U.S. importers reported that they were always interchangeable, and the only responding U.S. purchaser reported that they were frequently interchangeable. CR/PR at Tables II-12-13.

In comparing subject imports from the Netherlands with subject imports from Poland, three of five U.S. importers reported that they were always or frequently interchangeable, and two of three U.S. purchasers reported that they were always or frequently interchangeable. CR/PR at Tables II-12-13.

In comparing subject imports from the Netherlands with subject imports from Spain, three of five U.S. importers reported that they were always or frequently interchangeable, and the only responding U.S. purchaser reported that they were frequently interchangeable. CR/PR at Tables II-12-13.

In comparing subject imports from Poland with subject imports from Spain, two of four U.S. importers reported that they were always interchangeable, and the only responding U.S. purchaser reported that they were frequently interchangeable. CR/PR at Tables II-12-13.

[49] CR/PR at Table IV-4.

[50] CR/PR at Table IV-4.

These data show that both *** and importers of subject CPMs from each source sold each of the four pricing products, corresponding to four different types of CPM products, during the POI.[51]

Other data in the record further corroborate fungibility between and among the domestic like product and subject imports from each source. Most responding purchasers rated domestically produced CPMs as comparable to imports from each subject source with respect to at least 14 of 16 purchasing factors, and all responding purchasers rated imports from each subject source as comparable with each other with respect to all 16 purchasing factors.[52] Likewise, *** reported that non-price differences are never significant in purchasing decisions between and among the domestic like product and imports from each subject source,[53] and most importers and purchasers similarly reported that non-price differences are only sometimes or never significant in purchasing decisions between and among the domestic like product and imports from each subject source.[54]

Channels of Distribution. Domestically produced CPMs and imports from each subject country were primarily or exclusively sold to retailers during the POI.[55]

Geographic Overlap. Domestically produced CPMs and imports from each subject country were sold in all regions of the contiguous United States during the POI.[56]

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[51] CR/PR at Tables V-4-7.

[52] CR/PR at Table II-10.

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

[54] CR/PR at Table II-15 (showing that majorities of importers reported that non-price differences are only sometimes or never significant in six of 10 comparisons between and among the domestic like product and imports from each subject source) and Table II-16 (showing that majorities of purchasers reported that non-price differences are only sometimes or never significant in eight of 10 comparisons between and among the domestic like product and imports from each subject source).

[55] CR/PR at Table II-1. Domestic CPMs and subject imported CPMs from the Netherlands, Poland, and Spain were primarily sold to retailers during the POI; subject imported CPMs from France were *** sold to retailers during this period. *Id*.

We also note that, within the retail channel of distribution, there was overlap between subject imports and the domestic like product with respect to branding: most of the subject imports sold to retailers over the POI – between *** percent and *** percent – and a significant percentage of the domestic like product sold to retailers over this period – between *** percent and *** percent – were private label CPMs. CR/PR at Table II-1. Private label CPMs are unbranded CPMs sold by retailers under their own labels. CR/PR at II-1 ("Retail users may purchaser certain preserved mushrooms under the manufacturers' label ('branded') or under their own retail label ('private label')."); *see also* Tr. at 168 (Purcell) ("'{P}rivate label' means the grocery store brand. It's their label."); *id.* at 167 (Purcell) ("Well, {CPMs with an HEB label} would be private label. It's the store's brand. Green Giant and Del Monte are what we in this country would call the 'national brands.'").

[56] CR/PR at Table II-2.

Simultaneous Presence in Market. Domestically produced CPMs and imports from each subject country were simultaneously present throughout the POI.[57]

Conclusion. The record shows that imports from France, the Netherlands, Poland, and Spain are fungible with each other and the domestic like product. Imports from each subject country and the domestic like product also overlapped with respect to channels of distribution and geographic markets and were simultaneously present throughout the POI. Because the record shows a reasonable overlap of competition between and among domestically produced CPMs and imports from each subject country, we cumulate subject imports from France, the Netherlands, Poland, and Spain for purposes of our analysis of whether the domestic industry is materially injured by reason of subject imports.

V. Material Injury by Reason of Subject Imports

Based on the record in the final phase of the investigation, we find that an industry in the United States is materially injured by reason of cumulated subject imports of CPMs from France, the Netherlands, Poland, and Spain.

A. Legal Standard

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[58] 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.[59] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[60] 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.[61] No single factor is dispositive, and all relevant factors are considered "within the

[57] CR/PR at Tables IV-8 & V-4-7.

[58] 19 U.S.C. §§ 1671d(b), 1673d(b).

[59] 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).

[60] 19 U.S.C. § 1677(7)(A).

[61] 19 U.S.C. § 1677(7)(C)(iii).

context of the business cycle and conditions of competition that are distinctive to the affected industry."[62]

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,[63] 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.[64] 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.[65]

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

[62] 19 U.S.C. § 1677(7)(C)(iii).

[63] 19 U.S.C. §§ 1671d(b), 1673d(b).

[64] *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).

[65] 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).

injury threshold.[66] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[67] 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.[68] It is clear that the existence of injury caused by other factors does not compel a negative determination.[69]

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

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[66] 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.

[67] 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.").

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

[69] *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.").

imports."[70] The Commission ensures that it has "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports." [71] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[72]

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.[73] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[74]

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.

1. Demand Conditions

CPMs are typically used as ingredients in various food products, including sauces, soups, pizzas, and gravies.[75] U.S. demand for CPMs is therefore driven by consumer demand for the food products in which they are used.[76] Demand for CPMs increased in 2020 due to the COVID-19 pandemic, which caused consumers to prepare more food at home and increased demand

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[70] *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*.

[71] *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.

[72] *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.").

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

[74] *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.").

[75] CR/PR at I-9.

[76] CR/PR at I-9 & II-11.

for shelf-stable food products.[77] Thus, from 2019 to 2020, there was a spike in demand as reflected by apparent U.S. consumption, which increased by *** percent.[78]

Giorgio reported that U.S. demand for CPMs has *** since January 1, 2019.[79] Eight of 14 responding U.S. importers, and four of six responding U.S. purchasers, reported that U.S. demand for CPMs has increased since January 1, 2019.[80]

Apparent U.S. consumption of CPMs increased from *** pounds in 2019 to *** pounds in 2020, before decreasing to *** pounds in 2021, a level *** percent higher than in 2019. It was *** percent lower in January-June 2022 ("interim 2022"), at *** pounds, than in January-June 2021 ("interim 2021"), at *** pounds.[81]

2. Supply Conditions

The domestic industry was the second-largest source of supply to the U.S. market throughout the POI.[82] The industry's share of apparent U.S. consumption increased from *** percent in 2019 to *** percent in 2020, before decreasing to *** percent in 2021; its market share was higher in interim 2022, at *** percent, than in interim 2021, at *** percent.[83] [84] The domestic industry reported annual practical production capacity of *** pounds from 2019 to 2021, equivalent to *** of apparent U.S. consumption in those years.[85] However, the industry's annual capacity utilization rate never rose above *** percent during the period.[86] U.S.

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[77] CR/PR at I-9 & II-1.

[78] CR/PR at Table IV-9. Based on official import statistics, apparent U.S. consumption increased by *** percent between 2019 and 2020. *Id*. at Table D-2.

[79] CR/PR at Table II-4.

[80] CR/PR at Table II-4.

[81] CR/PR at Tables IV-9 & C-1. Based on official import statistics, apparent U.S. consumption of CPMs increased from *** pounds in 2019 to *** pounds in 2020 and *** pounds in 2021, a level *** percent higher than in 2019. It was *** percent lower in interim 2022, at *** pounds, than in interim 2021, at *** pounds. *Id*. at Table D-2.

[82] CR/PR at Tables IV-9, C-1 & D-2.

[83] CR/PR at Tables IV-9 & C-1. Based on official import statistics, the domestic industry's share of apparent U.S. consumption increased from *** percent in 2019 to *** percent in 2020, before decreasing to *** percent in 2021. Its share was higher in interim 2022, at *** percent, than in interim 2021, at *** percent. *Id*. at Table D-2.

[84] We note that these figures do not account for *** and ***, both of which reported wholly or largely ceasing production of CPMs during the POI. *Id*. at III-1, n.1.

[85] CR/PR at Tables III-4, C-1 & D-2

[86] CR/PR at Tables III-4 & C-1. The domestic industry's capacity utilization was *** percent in 2019, *** percent in 2020, and *** percent in 2021. *Id*. Its capacity utilization was *** percent in interim 2022, compared to *** percent in interim 2021. *Id*.

producer *** ceased producing CPMs in 2019, and U.S. producer *** ceased producing CPMs, either entirely or largely, in 2021.[87]

*** reported an inability to supply the entirety of ***.[88] However, *** also reported that its ***.[89] Purchaser *** reported that Giorgio suspended its CPM shipments to ***.[90]

Cumulated subject imports were the largest source of supply to the U.S. market throughout the POI.[91] Subject imports as a share of apparent U.S. consumption decreased from *** percent in 2019 to *** percent in 2020 and *** percent in 2021; their market share was lower in interim 2022, at *** percent, than in interim 2021, at *** percent.[92] Thus, cumulated subject imports supplied over half the U.S. market throughout the entire POI.

Three of six of responding purchasers reported that the availability of subject imports had changed since the beginning of the POI, citing supply shortages resulting from the COVID-19 pandemic.[93] Importers likewise reported that the supply of subject imports was constrained during the POI. Importer *** reported that *** had constrained the supply of CPMs from Spain.[94] Importer *** reported that it had difficulty securing supply from the Netherlands for much of 2022 due to an issue between its vendor and that vendor's supplier.[95] Importer ***, which reported exclusively importing CPMs from subject sources during the POI, reported

[87] CR/PR at III-1, nn.1 & 2.

[88] CR/PR at II-9. *** also reported ***. *Id*. Giorgio reported that its shipments of organic CPMs only comprised a small portion of its total CPM shipments during the POI. *See* Petitioner's Prehearing Br. at 17; *see also* *** U.S. Producer Questionnaire Response at II-12a and CR/PR at Table IV-6 (showing that organic CPMs accounted for only *** percent of *** U.S. shipments in 2021).

[89] *See* *** U.S. Producer Questionnaire at IV-16; *see also* Tr. at 33 (Loiseau) (Giorgio official testifying that "in many instances, we were able to supply our customers with even greater volumes beyond their historical demands.").

[90] CR/PR at II-10. While HEB claims that *** has experienced supply constraints due to shortages of domestically produced fresh mushrooms, the agricultural raw material used in CPMs – *see* HEB's Prehearing Br. at 5 – *** reported no such constraint on its production of CPMs. *See* *** U.S. Producer Questionnaire Response at IV-16 & Tr. at 71 (Loiseau) (stating that *** could "double" or "triple" its supply of fresh mushrooms if needed).

[91] CR/PR at Tables IV-9, C-1 & D-2.

[92] CR/PR at Tables IV-9 & C-1. Based on official import statistics, cumulated subject imports' share of apparent U.S. consumption decreased from *** percent in 2019 to *** percent in 2020, before increasing to *** percent in 2021; their share was lower in interim 2022, at *** percent, than in interim 2021, at *** percent. *Id*. at Table D-2.

[93] CR/PR at II-10.

[94] *** U.S. importer Questionnaire Response at II-16; CR/PR at II-10.

[95] *** U.S. importer Questionnaire Response at II-16; CR/PR at II-10.

supply constraints due to its supplier not being Customs Trade Partnership Against Terrorism compliant.[96]

Nonsubject imports were the smallest source of supply to the U.S. market throughout the POI.[97] Their share of apparent U.S. consumption decreased from *** percent in 2019 to *** percent in 2020, before increasing to *** percent in 2021; their market share was higher in interim 2022, at *** percent, than in interim 2021, at *** percent.[98] The largest source of nonsubject imports during the POI was Prochamp in the Netherlands.[99] Nonsubject imports of CPMs from Chile, China, India, and Indonesia have been subject to antidumping duty orders since 1998, which remain in effect following the Commission's affirmative determinations in 2021 in the fourth five-year reviews of those orders.[100]

3. Substitutability and Other Conditions

We find that there is a high degree of substitutability between cumulated subject imports and the domestic like product. *** reported that the domestic like product is always interchangeable with imports from each subject source.[101] Similarly, with one exception, a majority of responding importers and purchasers reported that the domestic like product is always or frequently interchangeable with imports from each subject source.[102] Likewise, most responding purchasers rated the domestic like product as comparable to imports from each subject source with respect to at least 14 of 16 purchasing factors.[103] *** reported that non-price differences are never significant in purchasing decisions between and among the domestic like product and imports from each subject source,[104] and most importers and purchasers similarly reported that non-price differences are only sometimes or never significant

[96] *** U.S. Importer Questionnaire Response at II-16; CR/PR at II-10.

[97] CR/PR at Tables IV-9, C-1 & D-2.

[98] CR/PR at Tables IV-9 & C-1. Based on official import statistics, nonsubject imports' share of apparent U.S. consumption decreased from *** percent in 2019 to *** percent in 2020, before increasing to *** percent in 2021; their share was lower in interim 2022, at *** percent, than in interim 2021, at *** percent. *Id*. at Table D-2.

[99] CR/PR at Table IV-2. The largest nonsubject country source of nonsubject imports during the POI was Indonesia. *Id*. at I-3 and II-9.

[100] CR/PR at I-5; *Preserved Mushrooms from Chile, China, India, and Indonesia*, Inv. Nos. 731-TA-776-779 (Fourth Review), USITC Pub. 5167 (Mar. 2021).

[101] CR/PR at Table II-11.

[102] CR/PR at Tables II-12-13. The sole exception is that, in comparing the domestic like product and subject imports from Spain, two of three importers reported that they were sometimes or never interchangeable. *Id*. at Table II-12.

[103] CR/PR at Table II-10.

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

in purchasing decisions between and among the domestic like product and imports from each subject source.[105] [106]

We also find that price is an important factor in CPM purchasing decisions. Price/value/cost, along with quality, was cited by purchasers most frequently as being among

[105] CR/PR at Table II-15 (showing that majorities of importers reported that non-price differences are only sometimes or never significant in six of 10 comparisons between and among the domestic like product and imports from each subject source) and Table II-16 (showing that majorities of purchasers reported that non-price differences are only sometimes or never significant in eight of 10 comparisons between and among the domestic like product and imports from each subject source).

[106] The Okechamp Respondents argue that there is only a limited degree of substitutability between the domestic like product and subject imports for two reasons. First, they argue that the domestic like product and subject imported CPMs generally compete in different market segments, with the former primarily competing in the branded product market segment and the latter primarily competing in the private label market segment. *See* Okechamp Respondents' Prehearing Br. at 5-6. Second, they argue that subject imports are of a higher quality than domestically produced CPMs. *See* Okechamp Respondents' Posthearing Br. at 4-6. We are unpersuaded that either factor served to limit the substitutability of subject and domestic CPMs to a significant degree.

With respect to their first argument, the record does not reflect that the market for CPMs is segmented between branded and private label products. To the contrary, branded and private label CPMs are purchased by the same retailers, who display them side-by-side on their shelves. *See* CR/PR at Table II-1 & preliminary phase conference transcript at 13 (Loiseau) ("{p}reserved mushrooms from the subject countries are sold alongside Giorgio's preserved mushrooms, branded and private-label, on the same shelves at the same retailers."). Moreover, as discussed above in Section IV.B., the domestic industry and subject importers sell both branded and private label CPMs. *See* CR/PR at Table II-1. Further, Giorgio has submitted evidence that it has endeavored to secure additional private label sales, but was unsuccessful due to subject import competition, and has also submitted evidence of obtaining, or being close to obtaining, such sales after the petitions were filed. *See* Exhibit 6 to Petitioner's Prehearing Br. and attachments thereto; Exhibit 4 to Petitioner's Posthearing Br. and attachments thereto.

With respect to their second argument, the record does not indicate that subject imports are of a higher quality than the domestic like product. To the contrary, all responding purchasers reported that the domestic like product is of a comparable quality to imports from each subject source. CR/PR at Table II-10. Contrary to the Okechamp Respondents' claim that the darker color of domestically produced CPMs relative to subject imports reflects their lower quality, the record indicates that this difference in color is explained by differences in the preservatives used in these products, not by differences in their quality. *See* Exhibit 4 to Petitioner's Posthearing Br. at paragraphs 3, 6, and 7 (Declaration of Brian Loiseau, Giorgio's SVP of Sales and Business Development). Further, there is no record evidence to indicate that purchasers associate darker or lighter colors with differences in quality. *See* Exhibit 4 to Petitioner's Posthearing Br at para. 5 ("Giorgio has no insights from purchasers (either from customer surveys or our company's consumer hotline) that equate a darker mushroom with a lower quality product. Indeed, as noted during the Commission's hearing, it is plausible that a consumer would view a product that involves lightly colored mushrooms to be lacking in mushroom flavor.").

the top three factors influencing their CPM purchasing decisions.[107] Moreover, price was cited by purchasers most frequently as the first most important factor influencing their purchasing decisions.[108] Similarly, eight of nine responding purchasers ranked price as very important in their purchasing decisions, although a slightly greater number of purchasers, nine, ranked product consistency and quality meets industry standards as very important.[109]

Giorgio sold CPMs mostly using ***, but also sold substantial quantities using ***.[110] Importers sold subject merchandise mainly using ***, but also sold substantial quantities using ***.[111]

During the POI, domestically produced CPMs were sold *** from inventory.[112] Cumulated subject imports were sold *** from inventory, but *** quantities were produced to order.[113] U.S. importers generally reported longer lead times than U.S. producers.[114]

The main raw material input for CPMs is fresh mushrooms.[115] Raw materials accounted for *** percent of the cost of goods sold ("COGS") for domestically produced CPMs in 2019, *** percent in 2020, and *** percent in 2021; raw materials accounted for *** percent of the industry's COGS in interim 2022 compared to *** percent in interim 2021.[116] Giorgio reported that raw material prices have *** since 2019, while almost all responding importers reported that such prices have risen since that time.[117] According to the U.S. Department of Agriculture, fresh mushroom prices have increased slightly overall since 2019.[118]

[107] CR/PR at Table II-6. Eight firms each cited price/value/cost and quality as among the top three factors influencing their purchasing decisions. The next most frequently cited factor was availability/supply capacity (seven firms). *Id*.

[108] CR/PR at Table II-6.

[109] CR/PR at Table II-7.

[110] CR/PR at Table V-3.

[111] CR/PR at Table V-3.

[112] CR/PR at II-16.

[113] CR/PR at II-16.

[114] CR/PR at II-13.

[115] CR/PR at V-1 & Table VI-1.

[116] CR/PR at Table VI-1.

[117] CR/PR at V-1. Most responding purchasers reported that they were unfamiliar with raw material prices for CPMs. *Id.*

[118] CR/PR at Figure V-1 & Table V-1.

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."[119]

Cumulated subject import volume increased by 7.0 percent from 2019 to 2021, increasing from 33.2 million pounds in 2019 to 35.3 million pounds in 2020 and 35.6 million pounds in 2021. It was 24.1 percent lower in interim 2022, at 14.6 million pounds, than in interim 2021, at 19.3 million pounds.[120]

Cumulated subject imports as a share of apparent U.S. consumption decreased by *** percentage points from 2019 to 2021, decreasing from *** percent in 2019 to *** percent in 2020 and *** percent in 2021. It was *** percentage points lower in interim 2022, at *** percent, than in interim 2021, at *** percent.[121]

The volume of cumulated subject imports *** U.S. CPM production *** the POI. Notably, the ratio of cumulated subject imports to U.S. CPM production was *** percent in 2019, *** percent in 2020, and *** percent in 2021. It was *** percent in interim 2022, compared to *** percent in interim 2021.[122]

[119] 19 U.S.C. § 1677(7)(C)(i).

[120] CR/PR at Table IV-2. Based on official import statistics, cumulated subject import volume increased by *** percent from 2019 to 2021, increasing from *** pounds in 2019 to *** pounds in 2020 and *** pounds in 2021. It was *** percent lower in interim 2022, at *** pounds, than in interim 2021, at *** pounds. *Id*. at Table D-1.

[121] CR/PR at Tables IV-9 & C-1. Based on official import statistics, cumulated subject imports as a share of apparent U.S. consumption increased by *** percentage points from 2019 to 2021, decreasing from *** percent in 2019 to *** percent in 2020, before increasing to *** percent in 2021. It was *** percentage points lower in interim 2022, at *** percent, than in interim 2021, at *** percent. *Id*. at Table D-2.

[122] CR/PR at Table IV-2. Based on official import statistics, the ratio of cumulated subject imports to U.S. CPM production was *** percent in 2019, *** percent in 2020, and *** percent in 2021. It was *** percent in interim 2022, compared to *** percent in interim 2021. *Id*. at Table D-1.

In light of the above, we find that the volume of cumulated subject imports is significant in absolute terms and relative to both production and consumption in the United States.[123] [124]

D. Price Effects of the Subject Imports

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

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[125]

As addressed in Section VI.B.3 above, we have found a high degree of substitutability between cumulated subject imports and the domestic like product, and that price is an important factor in purchasing decisions.

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of four pricing products that were sold at arm's length to unrelated U.S. customers during the first quarter of 2019 through the second quarter of

[123] We are unpersuaded by the Okechamp Respondents' argument that the volume of cumulated subject imports is not significant because apparent U.S. consumption exceeded the domestic industry's practical capacity during the POI. *See* Okechamp Respondents' Prehearing Br. at 3; Okechamp Respondent's Posthearing Br. at 7-9. Whether Giorgio is capable of supplying the entirety of the U.S. market would not change our finding in this investigation regarding the significance of subject import volume under the statute. *See* 19 U.S.C. § 1677(7)(C)(i). Moreover, Giorgio's installed capacity exceeded apparent U.S. consumption throughout the period, and Giorgio reported the ability to increase its practical capacity by *** and sourcing additional volumes of fresh mushrooms. *See* CR/PR at Table III-5 (showing that Giorgio's installed overall capacity, as opposed to its practical capacity, was *** pounds in each full year of the POI and *** pounds in both interim periods, amounts that *** exceeded apparent U.S. consumption throughout the POI), and III-6 n.4 (stating that ***); *see also* Tr. at 71 (Loiseau) ("if we need to expand our capacity, we absolutely have the facilities … The question would be then our ability to source raw mushrooms. I'm very confident we could double our raw mushroom sourcing. We could triple our raw mushroom sourcing.").

[124] Chairman Johanson reaches the same conclusion but bases his analysis primarily on official import statistics.

[125] 19 U.S.C. § 1677(7)(C)(ii).

2022.[126] One domestic producer and 11 importers provided usable pricing data, although not all firms reported pricing data for all products for all quarters.[127] Pricing data reported by these firms accounted for approximately *** percent of U.S. shipments of domestically produced CPMs, *** percent of U.S shipments of subject imports from France, *** percent of U.S shipments of subject imports from the Netherlands, *** percent of U.S shipments of subject imports from Poland, and *** percent of U.S shipments of subject imports from Spain in 2021.[128]

The price comparison data show that cumulated subject imports undersold the domestic like product in 125 of 209 quarterly comparisons, or in 59.8 percent of the available comparisons, at margins ranging between 0.0 and 64.0 percent and averaging 21.2 percent.[129] Cumulated subject imports oversold the domestic like product in 84 of 209 quarterly comparisons, at margins ranging between 0.4 and 51.5 percent and averaging 17.8 percent.[130]

Quarters in which there was underselling by subject imports accounted for 81.9 percent of the reported volume of cumulated subject import sales (*** pounds), while quarters in which there was overselling by subject imports accounted for 18.1 percent of the reported

[126] The four pricing products are as follows:
Product 1.-- Stems and pieces, in 4 ounce cans (excluding organic mushrooms);
Product 2.-- Stems and pieces, in 8 ounce cans (excluding organic mushrooms);
Product 3.-- Whole sliced mushrooms, in 4 ounce cans (excluding organic mushrooms);
Product 4.-- Sliced mushrooms, in 4.5 ounce jars (excluding organic mushrooms). CR/PR at V-6.
[127] CR/PR at V-7.
[128] CR/PR at V-7.
[129] CR/PR at Table V-10.
[130] CR/PR at Table V-10.

volume of cumulated subject import sales (*** pounds).[131]

We find that underselling by cumulated subject imports caused the domestic industry to lose sales. Seven of eight responding purchasers reported that they had purchased subject imports instead of the domestic like product during the POI.[132] Four of those seven responding purchasers reported that subject imports were priced lower than the domestic like product, and two of the four reported that price was a primary reason for their decision to purchase subject imports over the domestic like product.[133] Those two firms, *** and ***, collectively confirmed purchasing *** pounds of subject imports instead of domestic like product primarily due to price.[134] This quantity of confirmed lost sales is substantial in the context of the U.S. market for CPMs. It is equivalent to *** percent of the *** pounds of cumulated subject imports that responding purchasers reported purchasing during the POI.[135] It is also equivalent to *** percent of the domestic industry's total U.S. shipments during the POI, and is greater than the entirety of the industry's U.S. shipments in 2021.[136]

In light of the high degree of substitutability between the domestic like product and subject imports, the importance of price in purchasing decisions, the underselling in a majority of quarterly comparisons, and the underselling with respect to the vast majority of reported subject import sales volume, we find that subject import underselling was significant during the

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[131] CR/PR at Table V-10. The Okechamp Respondents argue that subject import underselling is overstated because the domestic industry primarily sells branded CPMs, which command a price premium, while subject importers primarily sell private label CPMs, which do not, and the pricing products used by the Commission do not differentiate between branded and private label CPMs. *See* Okechamp Respondents' Prehearing Br. at 6 & 11. We are unpersuaded by this argument. Both the domestic industry and subject importers sold substantial volumes of both branded and private label products – CR/PR at Table II-1 – and the record indicates that branded CPMs are not necessarily sold at a price premium relative to private label CPMs. *See* Tr. at 200 (Purcell) (purchaser witness testifying that branded CPMs and private label CPMs with the same specifications "would be the same price."); *see also* Exhibit 4 to Petitioner's Posthearing Brief at paragraphs 28-29 (declaration of Brian Loiseau providing examples of instances in which ***). Moreover, the Okechamp Respondents did not file comments on the draft questionnaires requesting that the pricing product definitions differentiate between branded and private label CPMs, despite the Commission's request that the parties comment on this specific issue. *See* EDIS Doc. 774029. Indeed, no respondent filed any comments on the draft questionnaires.

[132] CR/PR at Table V-12.

[133] CR/PR at Table V-12.

[134] CR/PR at Table V-12. Specifically, *** confirmed *** pounds of lost sales, and *** confirmed *** pounds of lost sales. *Id*.

[135] *Compare* CR/PR Tables V-11 & V-12.

[136] *Derived from* CR/PR Tables III-7 & V-12. Further, it is greater than the entirety of the industry's U.S. shipments in 2019. *Id*.

POI. The underselling by cumulated subject imports led the domestic industry to lose a substantial volume of sales during the period.[137]

We have also examined price trends over the POI. The domestic industry's sales prices for all four pricing products fluctuated during the POI but increased overall.[138] Likewise, subject importers' sales prices for all four pricing products (other than for pricing product four from France) also fluctuated but increased overall.[139]

We find that subject imports prevented price increases that otherwise would have occurred to a significant degree.[140] We recognize that the domestic industry's COGS-to-net sales ratio decreased by *** percentage points from 2019 to 2021, increasing from *** percent in 2019 to *** percent in 2020, before decreasing to *** percent in 2021, and that it was *** percentage points lower in interim 2022, at *** percent, than in interim 2021, at *** percent.[141] However, despite the increase in apparent U.S. consumption from 2019 to 2021, and the spike in demand between 2019 and 2020, the domestic industry was not able to charge prices to more fully cover its costs during that time. Instead, the domestic industry's COGS-to-

[137] Chairman Johanson concurs with the majority's finding that subject imports significantly undersold the domestic like product, causing the domestic industry to lose a substantial volume of sales to subject imports. In addition, he finds that the significant underselling allowed subject imports to capture market share from the domestic industry, with the cumulated subject import market share increasing by *** percentage points, from *** percent in 2019 to *** percent in 2021. CR/PR at Table D-2.

[138] The domestic industry's sales prices for pricing products 1, 2, 3, and 4 increased by *** percent, *** percent, *** percent, and *** percent, respectively, over the POI. CR/PR at Table V-8.

[139] Prices for pricing product 1 from France, the Netherlands, Poland, and Spain increased by *** percent, *** percent, *** percent, and *** percent, respectively, over the POI. Prices for pricing product 2 from France, the Netherlands, Poland, and Spain increased by *** percent, *** percent, *** percent, and *** percent, respectively, over the POI. Prices for pricing product 3 from France, the Netherlands, and Spain increased by *** percent, *** percent, and *** percent, respectively, over the POI (a first-to-last-quarter pricing comparison is not possible for pricing product 3 from Poland). Prices for pricing product 4 from the Netherlands and Poland increased by *** percent and *** percent, respectively, over the POI, while the price for pricing product 4 from France decreased by *** percent over this period (a first-to-last-quarter pricing comparison is not possible for pricing product 4 from Spain). CR/PR at Table V-8.

[140] Chairman Johanson does not join the finding of this sentence and does not join the remainder of section (D). Instead, he finds that subject imports significantly undersold the domestic like product, causing the domestic industry to lose a substantial volume of sales to subject imports, resulting in subject imports capturing market share from the domestic industry. He consequently finds that cumulated subject imports had significant price effects on the domestic industry.

[141] CR/PR at Table VI-1.

net-sales ratio increased from 2019 to 2020 and remained significantly above *** percent in each full year of the POI.[142]

The record indicates that competition from low-priced subject imports prevented the domestic industry from increasing its prices to more fully cover its costs during the POI. *** submitted contemporaneous internal and customer e-mails indicating that it was regularly faced with the choice of either lowering its prices or losing sales to low-priced subject imports during the POI.[143] Consistent with these e-mails, *** reported that it needed to ***.[144]

Furthermore, the domestic industry's COGS-to-net-sales ratio only fell below *** percent in interim 2022,[145] when the filing of the petitions coincided with a marked decline in subject import volume.[146] *** reported that the filing of the petitions enabled it to implement a "much-needed" *** percent price increase *** in interim 2022.[147] That the industry was only able to charge prices that covered its costs when subject imports receded from the market corroborates the price suppressing effects of subject import competition.

In sum, we find that subject imports significantly undersold the domestic like product, causing the domestic industry to lose a substantial volume of sales to subject imports and suppressing prices for the domestic like product to a significant degree. We consequently find that cumulated subject imports had significant price effects on the domestic industry.[148]

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[142] CR/PR at Table VI-1.

[143] These include, for example: (1) ***; (2) ***; (3) ***; (4) ***; and (5) ***. *See* Attachments 1, 2, 3, and 7 to Exhibit 6 to Petitioner's Prehearing Br.; Attachment 3 to Exhibit 4 to Petitioner's Posthearing Br.

[144] CR/PR at V-23; *** U.S. Producer Questionnaire Response at IV-21.

[145] Specifically, the industry's COGS-to-net sales ratio was *** percent in interim 2022, compared to *** percent in interim 2021. CR/PR at Table VI-1.

[146] The volume of cumulated subject imports decreased by *** percent in interim 2022 relative to interim 2021 according to the questionnaire responses, and by *** percent according to official import statistics. CR/PR at Tables IV-2, C-1 & D-1.

[147] *See* Exhibit 1 to Petitioner's Posthearing Br. at 5 & Attachment 4 to Exhibit 4 to Petitioner's Posthearing Br.

[148] For reasons discussed in Section V.B.3. above, we are unpersuaded by the Okechamp Respondents' argument that cumulated subject imports could not have had significant price effects on the domestic industry because there is limited competition between the premium branded products *** sold by the domestic industry and the private label products *** sold by subject importers. *See* Okechamp Respondents' Posthearing Br. at 3-4. The record indicates that the market is not segmented between branded and private label products and that domestic producers and subject importers sell substantial volumes of both types of CPMs. *See* CR/PR at Table II-1 & preliminary phase conference transcript at 13 (Loiseau).

E. Impact of the Subject Imports[149]

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, 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."[150]

The domestic industry's performance was mixed during the POI by many measures.[151] Although the industry's production and capacity utilization increased from 2019 to 2021, its U.S. shipments and market share declined.[152] Despite the *** percent increase in apparent U.S. consumption during the 2019-2021 period, the domestic industry experienced *** operating and net losses throughout the period, worsening from 2019 to 2020 before narrowing *** in 2021, as low-priced subject imports captured substantial sales from the industry and suppressed prices for the domestic like product.[153]

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[149] 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, Commerce found dumping margins of 224.68 percent–360.88 percent for CPMs from France. *Certain Preserved Mushrooms from France: Final Affirmative Determination of Sales at Less Than Fair Value*, 87 Fed. Reg. 72963 (Nov. 28, 2022). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in France are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling and price effects of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[150] 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.

[151] We note that the data discussed below do not account for *** and ***, both of which reported wholly or largely ceasing production of CPMs during the POI and did not submit completed questionnaire responses. CR/PR at III-1, n.1.

[152] CR/PR at Tables III-4, III-7, IV-9 & D-2.

[153] CR/PR at Table VI-1.

The domestic industry's practical capacity remained stable at *** pounds in each year of the POI and *** pounds in each interim period.[154] Its production increased by *** percent from 2019 to 2021, increasing from *** pounds in 2019 to *** pounds in 2020 and *** pounds in 2021; it was *** percent lower in interim 2022, at *** pounds, than in interim 2021, at *** pounds.[155] Its capacity utilization followed the same trend as its production, increasing from *** percent in 2019 to *** percent in 2020 and *** percent in 2021; it was lower in interim 2022, at *** percent, than in interim 2021, at *** percent.[156]

Consistent with the trend in the domestic industry's production over the POI, the domestic industry's employment indicia generally increased irregularly from 2019 to 2021, but were lower in interim 2022 than in interim 2021. The industry's employment,[157] hours worked,[158] and wages paid[159] all followed this pattern. Productivity rose by *** percent from 2019 to 2021 and was *** percent higher in interim 2022 than in interim 2021.[160] Hourly wages increased overall by *** percent from 2019 to 2021 and were *** percent higher in interim 2022 than in interim 2021.[161]

The U.S. industry's U.S. shipments decreased overall by *** percent from 2019 to 2021, increasing from *** pounds in 2019 to *** pounds in 2020, before decreasing to *** pounds in 2021; they were *** percent lower in interim 2022, at *** pounds, than in interim 2021, at *** pounds.[162] The domestic industry's share of apparent U.S. consumption decreased by ***

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[154] CR/PR at Table III-4. As previously discussed, its installed overall capacity was *** higher, at *** pounds in each full year of the POI and *** pounds in each interim period. *Id*. at Table III-5.

[155] CR/PR at Table III-4.

[156] CR/PR at Table III-4.

[157] Employment increased overall by *** percent from 2019 to 2021, increasing from *** production and related workers ("PRWs") in 2019 to *** PRWs in 2020, before declining to *** PRWs in 2021; it was *** percent lower in interim 2022, at *** PRWs, than in interim 2021, at *** PRWs. CR/PR at Table III-9.

[158] Hours worked increased overall by *** percent from 2019 to 2021, increasing from *** hours in 2019 to *** hours in 2020, before declining to *** hours in 2021; it was *** percent lower in interim 2022, at ***, than in interim 2021, at *** hours. CR/PR at Table III-9.

[159] Wages paid increased by *** percent from 2019 to 2021, increasing from $*** in 2019 to $*** in 2020 and $*** in 2021; they were *** percent lower in interim 2022, at $***, than in interim 2021, at $***. CR/PR at Table III-9.

[160] Productivity increased from *** pounds per hour in 2019 to *** pounds per hour in 2020 and *** pounds per hour in 2021; it was *** pounds per hour in interim 2022 compared to *** pounds per hour in interim 2021. CR/PR at Table III-9.

[161] Hourly wages decreased from $*** per hour in 2019 to $*** per hour in 2020, before increasing to $*** per hour in 2021; they were $*** per hour in interim 2022 compared to $*** per hour in interim 2021. CR/PR at Table III-9.

[162] CR/PR at Table III-7.

percentage points from 2019 to 2021, increasing from *** percent in 2019 to *** percent in 2020, before decreasing to *** percent in 2021; its share was *** percentage points higher in interim 2022, at *** percent, than in interim 2021, at *** percent.[163]

The domestic industry's inventories increased by *** percent from 2019 to 2021, decreasing from *** pounds in 2019 to *** pounds in 2020, before increasing to *** pounds in 2021; they were *** percent higher in interim 2022, at *** pounds, than in interim 2021, at *** pounds.[164] As a ratio of total shipments, the domestic industry's end-of-period inventories declined from *** percent in 2019 to *** percent in 2020, before increasing to *** percent in 2021, and were higher in interim 2022, at *** percent, than in interim 2021, at *** percent.[165]

The domestic industry's financial performance remained poor throughout the POI by most metrics. Although the domestic industry's total net sales revenues increased overall by *** percent from 2019 to 2021 and were *** percent higher in interim 2021 than in interim 2020,[166] the domestic industry incurred operating and net income losses throughout the POI,[167] and consequently negative operating and net income margins throughout the period.[168] Similarly, the domestic industry incurred gross operating losses throughout almost the entire POI.[169]

The domestic industry's R&D expenses increased by *** percent from 2019 to 2021, but

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[163] CR/PR at Table IV-9. Based on official import statistics, the domestic industry's share of apparent U.S. consumption decreased by *** percentage points from 2019 to 2021, increasing from *** percent in 2019 to *** percent in 2020, before decreasing to *** percent in 2021; its share was *** percentage points higher in interim 2022, at *** percent, than in interim 2021, at *** percent. *Id*. at Table D-2.

[164] CR/PR at Table III-8.

[165] CR/PR at Table III-8.

[166] The domestic industry's total net sales revenues increased from $*** in 2019 to $*** in 2020, before decreasing to $*** in 2021; they were $*** in interim 2022, compared to $*** in interim 2021. CR/PR at Table VI-1.

[167] The domestic industry's operating and net income losses were both $*** in 2019, $*** in 2020, and $*** in 2021; they were both $*** in interim 2022 compared to $*** in interim 2021. CR/PR at Table VI-1.

[168] As a ratio to net sales, the domestic industry's operating income was negative *** percent in 2019, negative *** percent in 2020, and negative *** percent in 2021; it was negative *** percent in interim 2022, compared to negative *** percent in interim 2021. CR/PR at Table VI-1. As a ratio to net sales, the domestic industry's net income was negative *** percent in 2019, negative *** percent in 2020, and negative *** percent in 2021; it was negative *** percent in interim 2021, compared to negative *** percent in interim 2021. *Id*.

[169] The domestic industry' gross losses were $*** in 2019, $*** in 2020, and $*** in 2021. The industry had a gross profit of $*** in interim 2022, compared to a gross loss of $*** in interim 2021. CR/PR at Table VI-1.

were *** percent lower in interim 2022 than in interim 2021.[170] Its capital expenditures declined by *** percent from 2019 to 2021, but were *** higher in interim 2022 than in interim 2021.[171] The domestic industry's return on assets declined from negative *** percent in 2019 to negative *** percent in 2020, before increasing to negative *** percent in 2021.[172] Finally, *** reported negative effects on investment, growth, and development due to subject imports during the POI.[173]

We find a causal nexus between cumulated subject imports and the domestic industry's weak performance, and particularly its poor financial performance. During the POI, cumulated subject imports were significant in terms of volume, accounting for the majority of apparent U.S. consumption,[174] and undersold the domestic like product to a significant degree, with the vast majority of the volume of reported subject import sales corresponding to quarters of underselling.[175] Significant volumes of low-priced subject imports caused the domestic industry to lose a substantial volume of sales, with confirmed lost sales of *** pounds, and prevented the industry from increasing its prices to more fully cover its costs, despite strong demand.[176] Consequently, the domestic industry suffered low rates of capacity utilization; declining U.S. shipments; declining capital expenditures (except between interim periods); and substantial gross, operating, and net losses (except for gross profit in interim 2022) throughout the POI.[177] Both *** and *** indicated that their decisions to wholly or largely cease producing CPMs

[170] The domestic industry's R&D expenses increased from $*** in 2019 to $*** in 2020 and 2021; they were $*** in interim 2022 compared to $*** in interim 2021. CR/PR at Table VI-3.

[171] The domestic industry's capital expenditures declined from $*** in 2019 to $*** in 2020 and $*** in 2021; they were $*** in interim 2022 compared to $*** in interim 2021. CR/PR at Table VI-3.

[172] CR/PR at Table VI-3.

[173] CR/PR at Tables VI-5-6.

[174] CR/PR at Tables IV-9 & D-2.

[175] As previously discussed, quarters in which there was underselling accounted for *** percent of the reported volume of cumulated subject import sales. CR/PR at Table V-10.

[176] As noted above, Chairman Johanson does not join the majority's price suppression finding and instead relies on his finding that subject imports captured market share from the domestic industry through significant underselling to reach his conclusion of significant price effects from subject imports.

[177] *** attributed the *** percent decline in the domestic industry's capital expenditures to ***. CR/PR at Tables VI-3, VI-6.

during the POI were due to subject import competition.[178]

We find it instructive that the domestic industry was able to improve its performance in interim 2022 compared to interim 2021 after the filing of the petitions in March 2022, even as apparent U.S. consumption was lower. As cumulated subject import volume was down 24.1 percent in interim 2022 relative to interim 2021, the domestic industry was able to gain sales and increase prices by *** percent,[179] lowering the industry's COGS-to-net-sales ratio to below *** percent and improving the industry's financial performance.[180] That the domestic industry's financial performance improved in interim 2022 as cumulated subject imports receded from the U.S. market corroborates the significant impact these imports had on the domestic industry prior to the petitions' filing.

We have also considered whether there are other factors that may have had an adverse impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to subject imports. Nonsubject imports do not explain the injury we have attributed to subject imports. Although nonsubject imports increased irregularly as a share of apparent U.S. consumption from *** percent in 2019 to *** percent in 2021, they remained the smallest source of supply to the U.S. market throughout the POI and consistently possessed a market share far lower than that of subject imports.[181] Moreover, the *** percentage point increase in nonsubject import market share in interim 2022 relative to interim 2021, as subject imports receded from the U.S. market, did not prevent the domestic industry from improving its financial performance, as previously discussed.

We are unpersuaded by the Okechamp Respondents' argument that the domestic industry's supply constraints drew cumulated subject imports into the U.S. market and explain

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[178] *See* *** April 27, 2022 letter to the Commission (stating that "one of the primary reasons for closing the {CPM} facility was pressure related to low import pricing in the marketplace"); *** partial preliminary phase producer questionnaire response at III-15 (stating "basically we had to exit {the CPM} business as we could not compete with the very low prices of imported mushrooms. It would be a total loss.").

[179] As previously discussed, the domestic industry's COGS-to-net-sales ratio dropped below *** percent, specifically *** percent, for the first time in interim 2022, and *** announced a *** percent price increase in interim 2022. CR/PR at Table VI-1; Attachment 4 to Exhibit 4 to Petitioner's Posthearing Br.

[180] Specifically, while the domestic industry still incurred operating and net losses of $*** in interim 2022, those losses were *** percent lower than the operating and net losses of $*** that it incurred in interim 2021. CR/PR at Table VI-1. The domestic industry made a small gross profit of $*** in interim 2022, compared to a gross loss of $*** in interim 2021. *Id*.

[181] CR/PR at Tables IV-2 & D-1.

any injury.[182] As discussed in section V.B.2. above, *** reported that its ***.[183] The domestic industry otherwise possessed ample unused practical capacity throughout the POI, with an annual capacity utilization rate never exceeding *** percent, that could have been used to substantially increase the industry's production and U.S. shipments.[184] Furthermore, the record indicates that subject importers also experienced supply constraints, and were therefore in no better position to satisfy the pandemic-related spike in demand in 2020.[185] Finally, if shortages of domestically produced CPMs drew subject imports into the U.S. market during the POI, we would have expected to see more overselling by subject imports, rather than underselling in quarters corresponding to the vast majority of reported subject import sales volume.[186]

We are also unpersuaded by the Okechamp Respondents' argument that any injury to the domestic industry is explained by its higher production costs relative to subject foreign producers, allegedly due to the domestic industry's "antiquated" use of hand-harvested mushrooms in the production of CPMs.[187] As the Commission observed in its preliminary determinations, cumulated subject producers' lower production costs for CPMs do not obviate our finding that low-priced cumulated subject imports had a significant adverse impact on the domestic industry.[188]

Finally, we are unpersuaded by the Okechamp Respondent's argument that because improvements in the domestic industry's performance indicia coincided with increases in cumulated subject import volume and subject import underselling, cumulated subject imports

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[182] Okechamp Respondent's Prehearing Br. at 8 & 11; Okechamp Respondents' Posthearing Br. at 17.

[183] *See* *** U.S. Producer Questionnaire at IV-16; *see also* Tr. at 33 (Loiseau).

[184] CR/PR at Tables III-4 & III-5. Moreover, as discussed earlier, Giorgio's installed capacity was *** higher than its reported practical capacity, and absent subject import competition Giorgio could have increased its practical capacity.

[185] CR/PR at II-9-10.

[186] CR/PR at Table V-10.

[187] Okechamp Respondents' Prehearing Br. at 15-17. The Okechamp Respondents claim that, unlike the domestic industry, subject producers use machine harvested mushrooms, which result in lower production costs. *Id*.

[188] Preliminary Determinations at 31. The Commission has generally rejected arguments that it should discount underselling or any adverse impact by subject imports because of the lower cost of manufacturing the subject imports, noting that the statute "requires the Commission to assess whether imports are being sold by importers in the U.S. market at lower prices than the domestic like product, not to compare the cost of production of foreign producers with the cost of production in the United States." *See*, *e.g.*, *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 (June 2007) at 9, n.119; *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Final), USITC Pub. 4034 (Sept. 2008) at 19-20, n.133.

could have had no adverse impact on the domestic industry.[189] As an initial matter, we note that recent improvements in the domestic industry's performance do not compel a negative determination.[190] Moreover, although the domestic industry's financial losses were modestly lower in 2021 than in 2019, the industry's operating and net losses remained large throughout the 2019-2021 period despite growing demand, and only narrowed appreciably after the filing of the petitions in interim 2022. As previously discussed, we have found a causal nexus between the domestic industry's poor performance and low-priced subject imports, which captured substantial sales from the industry and suppressed prices for the domestic like product.[191] [192]

In sum, based on the record in the final phase of the investigation, we conclude that cumulated subject imports had a significant adverse impact on the domestic industry.

VI. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of CPMs from France found by Commerce to be sold in the United States at less than fair value.

[189] Okechamp Respondents' Prehearing Br. at 15.

[190] 19 U.S.C. § 1677(7)(J).

[191] For reasons previously discussed in Section V.B.3., we reject the Okechamp Respondents' argument that cumulated subject imports did not materially injure the domestic industry because the competition between these imports and the domestic like product is attenuated. *See* Okechamp Respondents' Posthearing Br. at 1-6. As discussed in that section, the record does not reflect that the domestic like product primarily competes in a different market segment than the domestic like product, or that cumulated subject imports are of a higher quality than the domestic like product.

[192] Chairman Johanson, as previously noted, does not find that subject imports suppressed prices, but he instead finds that subject imports captured market share from the domestic industry through significant underselling.

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 Giorgio Foods, Inc. ("Giorgio"), Blandon Pennsylvania, on March 31, 2022, 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 certain preserved mushrooms[1] from France, the Netherlands, Poland, and Spain. Table I-1 presents information relating to the background of these investigations.[2] [3]

Table I-1
Certain preserved mushrooms: Information relating to the background and schedule of this proceeding

Effective date	Action
March 31, 2022	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (87 FR 20460, April 7, 2022)
April 20, 2022	Commerce's notice of initiation (87 FR 24941, April 27, 2022)
May 16, 2022	Commission's preliminary determinations (87 FR 30996, May 20, 2022)
September 13, 2022	Commerce's preliminary determination for France (87 FR 55997, September 13, 2022); scheduling of final phase of Commission investigations (87 FR 57717, September 21, 2022)
November 3, 2022	Commerce's preliminary determinations for the Netherlands (87 FR 66265, November 3, 2022), Poland (87 FR 66273, November 3, 2022), and Spain (87 FR 66262, November 3, 2022)
November 17, 2022	Commission's hearing
November 28, 2022	Commerce's final determination for France (87 FR 72963, November 28, 2022)
December 19, 2022	Commission's vote (France)
January 12, 2023	Commission's views (France)
March 20, 2023	Scheduled date for Commerce's final determinations for the Netherlands, Poland, and Spain

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

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

Statutory criteria

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

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

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

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

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

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

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

Organization of report

Part I of this report presents information on the subject merchandise, 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 the U.S. producer. 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.

Market summary

Certain preserved mushrooms are generally sold to consumers in retail stores and/or used as ingredients in prepared foods such as soups, gravies, sauces, pizzas, and entrees. The leading U.S. producer of certain preserved mushrooms is Giorgio, while leading producers of certain preserved mushrooms outside the United States include Bonduelle Europe Long Life SAS ("Bonduelle Europe") of France, Okechamp BV and Prochamp BV of the Netherlands, Bonduelle Poland and Okechamp SA of Poland, and Eurochamp S.A.T. ("Eurochamp") of Spain. The leading U.S. importers of certain preserved mushrooms from the subject countries are *** from France and Poland, *** from the Netherlands, and *** from Spain. The leading importers of certain preserved mushrooms from nonsubject sources (primarily ***) are ***. U.S. purchasers of certain preserved

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

mushrooms are firms that retail or distribute certain preserved mushrooms, as well as (to a lesser extent) firms that use certain preserved mushrooms to produce downstream food products. Leading purchasers include ***.

Apparent U.S. consumption of certain preserved mushrooms totaled approximately *** pounds drained weight ($***) in 2021. Currently, one firm, Giorgio, is known to produce certain preserved mushrooms in the United States. U.S. producer Giorgio's U.S. shipments of certain preserved mushrooms totaled *** pounds drained weight ($***) in 2021, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled 33.1 million pounds drained weight ($64.9 million) in 2021 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled 6.8 million pounds drained weight ($14.5 million) in 2021 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on the questionnaire response of one firm that accounted for the vast majority of U.S. production of certain preserved mushrooms during 2021. U.S. imports are based on the questionnaire responses of 17 U.S. importers representing virtually all U.S. imports from France, *** percent of subject imports from the Netherlands, virtually all U.S. imports from Poland, *** percent of U.S. imports from Spain, *** percent of U.S. imports from subject sources, and *** percent of U.S. imports from nonsubject sources of certain preserved mushrooms imported from January 2019 to June 2022 under HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137. Select import data, as noted, are based on official import statistics for HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 (mushrooms of the genus *Agaricus*, prepared or preserved otherwise than by vinegar or acetic acid, in containers holding not more than 255 grams).

Previous and related investigations

Certain preserved mushrooms have been the subject of prior antidumping duty investigations in the United States. On January 6, 1998, antidumping duty petitions against certain preserved mushrooms[6] from Chile, China, India, and Indonesia were filed with Commerce and the Commission by (1) L.K. Bowman, Nottingham, Pennsylvania; (2) Modern Mushroom Farms, Inc., Toughkenamon, Pennsylvania; (3) Monterey Mushrooms, Inc., Watsonville, California; (4) Mount Laurel Canning Corp., Temple, Pennsylvania; (5) Mushroom Canning Co., Kennett Square, Pennsylvania; (6) Sunny Dell, Oxford, Pennsylvania; and (7) United Canning Corp., North Lima, Ohio.[7] On October 22, 1998, Commerce determined that imports of preserved mushrooms from Chile were being sold at LTFV and on December 31, 1998, determined that imports of preserved mushrooms from China, India, and Indonesia were being sold at LTFV. The Commission determined on November 25, 1998, that the domestic industry was materially injured by reason of LTFV imports of preserved mushrooms from Chile, and on February 11, 1999, determined that the domestic industry was materially injured by reason of LTFV imports of preserved mushrooms from China, India, and Indonesia. On December 2, 1998, Commerce issued its antidumping duty order on imports of preserved mushrooms from Chile, and on February 19, 1999, issued antidumping duty orders on imports of preserved mushrooms from China, India, and Indonesia.[8]

Following affirmative determinations in first, second, third, and fourth five-year reviews by Commerce and the Commission, Commerce issued a continuation of the antidumping duty orders on imports of preserved mushrooms from Chile, China, India, and Indonesia.[9]

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[6] The scope of the previous investigations was broader than the scope of these current investigations. The scope of these current investigations requires that certain preserved mushrooms be in containers each holding a net drained weight of not more than 12 ounces, while the scope of the previous investigations did not specify a weight limit. 87 FR 55997, September 13, 2022, and Certain Preserved Mushrooms from Chile, China, India, and Indonesia, Inv. Nos. 731-TA-776-779 (Fourth Review), USITC Publication 5167, March 2021, p. I-7. All certain preserved mushrooms covered by the scope of these current investigations were included in the previous investigations. Petitions, p. 4.

[7] Certain Preserved Mushrooms from Chile, China, India, and Indonesia, Inv. Nos. 731-TA-776-779 (Fourth Review), USITC Publication 5167, March 2021, p. I-3.

[8] Ibid., pp. I-3—I-4.

[9] Certain Preserved Mushrooms from Chile, China, India, and Indonesia, Inv. Nos. 731-TA-776-779 (Fourth Review), USITC Publication 5167, March 2021, pp. I-4—I-6 and Certain Preserved Mushrooms from Chile, India, Indonesia, and the People's Republic of China: Continuation of the Antidumping Duty Orders, 86 FR 14076, March, 12, 2021.

Nature and extent of sales at LTFV

Commerce published notices in the Federal Register of its preliminary determination on September 13, 2022,[10] and its final determination on November 28, 2022,[11] of sales at LTFV with respect to imports from France. On November 3, 2022, Commerce published notices in the Federal Register of its preliminary determinations of sales at LTFV with respect to imports from the Netherlands, Poland, and Spain.[12] Tables I-2 to I-5 present Commerce's dumping margins with respect to imports of certain preserved mushrooms from France, the Netherlands, Poland, and Spain.

Table I-2
Certain Preserved Mushrooms: Commerce's preliminary weighted-average LTFV margins with respect to imports from France

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Bonduelle Europe Long Life	360.88	360.88
France Champignon	360.88	360.88
All others	224.68	224.68

Source: 87 FR 55997, September 13, 2022 and 87 FR 72963, November 28, 2022.

[10] 87 FR 55997, September 13, 2022
[11] 87 FR 72963, November 28, 2022
[12] 87 FR 66262, 87 FR 66265, and 87 FR 66273, November 3, 2022.

Table I-3
Certain Preserved Mushrooms: Commerce's preliminary weighted-average LTFV margins with respect to imports from the Netherlands

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Okechamp B.V.	146.59	Pending
Prochamp B.V.	0.00	Pending
All others	132.97	Pending

Source: 87 FR 66265, November 3, 2022.

Table I-4
Certain Preserved Mushrooms: Commerce's preliminary weighted-average LTFV margins with respect to imports from Poland

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Okechamp S.A.	23.43	Pending
Bonduelle Polska-UL.Michala	30.01	Pending
Bonduelle Polska SA	30.01	Pending
All others	23.43	Pending

Source: 87 FR 66273, November 3, 2022.

Table I-5
Certain Preserved Mushrooms: Commerce's preliminary weighted-average LTFV margins with respect to imports from Spain

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Eurochamp S.A.T.	10.28	Pending
Riberebro Integral S.A.U.	40.07	Pending
All others	10.28	Pending

Source: 87 FR 66262, November 3, 2022.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[13]

> *The merchandise covered by these investigations are certain preserved mushrooms, whether imported whole, sliced, diced, or as stems and pieces. The preserved mushrooms covered under these investigations are the genus Agaricus. ''Preserved mushrooms'' refer to mushrooms that have been prepared or preserved by cleaning, blanching, and sometimes slicing or cutting. These mushrooms are then packed and heat sterilized in containers each holding a net drained weight of not more than 12 ounces (340.2 grams), including but not limited to cans or glass jars, in a suitable liquid medium, including but not limited to water, brine, butter, or butter sauce. Preserved mushrooms may be imported whole, sliced, diced, or as stems and pieces.*
>
> *Excluded from the scope are ''marinated,'' ''acidified,'' or ''pickled'' mushrooms, which are prepared or preserved by means of vinegar or acetic acid, but may contain oil or other additives. To be prepared or preserved by means of vinegar or acetic acid, the merchandise must be a minimum 0.5 percent by weight acetic acid.*

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is primarily imported under statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 of the Harmonized Tariff Schedule of the United States ("HTS"). Subject merchandise may also be imported under 2003.10.0143, 2003.10.0147, and 2003.10.053, which cover mushrooms in containers each holding more than 255 grams (just under 9 ounces). The 2022 general rate of duty for subheading 2003.10.01 is $0.06 per kilogram on drained weight plus 8.5 percent ad valorem. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

[13] 87 FR 66273, November 3, 2022.

The product

Description and applications

Certain preserved mushrooms are a type of processed mushroom product usually made from mushrooms in the genus *Agaricus*. Mushrooms, typically white button but also brown crimini or portabella, are packed in cans or jars with water, brine, or butter and sterilized using high temperatures. The mushrooms can be preserved whole, sliced, or as stems and pieces; the main form in the U.S. market is stems and pieces. Retail consumers typically use preserved mushrooms, which are tan or grey, tender, and slightly salty, as ingredients in other foods like sauces, soups, pizzas, and gravies. Cans and jars of certain preserved mushrooms are shelf-stable and have a shelf-life of three years.[14]

The in-scope size of cans and jars each hold not more than 340.2 grams or 12 ounces (oz) of preserved mushrooms and sold in retail channels under branded and private labels for consumption at home.[15] The main retail-sized containers of certain preserved mushrooms are 4 and 8 oz cans and 4.5 and 6 oz jars, though there are out-of-scope 16 oz cans available in the retail market.[16] Certain preserved mushrooms in jars are generally a higher quality, premium product compared with canned mushrooms that are either whole or sliced, rather than in the form of stems and pieces.[17] Demand for certain preserved mushrooms fluctuated or increased over the POI, increasing in 2020 and 2021 due to the COVID-19 pandemic as consumers prepared more food at home.[18]

[14] Petition, p. 6.

[15] Petition, p. 6.

[16] Conference transcript, p 17 (Loiseau); see Walmart.com "Hanover Domestic Mushrooms Pieces Stems, 16 Oz," https://www.walmart.com/ip/Hanover-Domestic-Mushrooms-Pieces-Stems-16-Oz/32174582.

[17] Conference, pp. 111-112 (Loiseau).

[18] Conference, p. 62 (Loiseau); Petitioner's post-conference brief, pp. 13-14; STR Respondents' post-conference brief, pp. 4-6; HEB's post-conference brief, p. 4; Coalition of Exporters' post-conference brief, p. 5. See also Part II.

Manufacturing processes

Certain preserved mushrooms are made from upstream, out-of-scope, fresh *Agaricus* mushrooms. U.S. mushroom growers focus on and sell the majority of production in the fresh market, whereas the share of mushroom production sold for processing in the United States ranged from 7 to 17 percent annually over the POI.[19] The mushrooms sold for processing typically do not meet the appearance and quality needed for the fresh market and therefore are sold for approximately half the price of mushrooms in the fresh market.[20] To preserve the fresh-market-quality of the mushrooms, nearly all mushrooms grown in the United States are harvested by hand, where the extra labor costs are compensated for higher returns in the fresh market.[21] In other countries, such as Poland, Spain, and the Netherlands, mushroom growers focus production on either the processing or the fresh markets.[22] This allows growers producing for the processing market to lower labor costs by mechanically harvesting mushrooms, resulting in lower raw mushroom costs for processors.[23]

In 2021, 394 million pounds of *Agaricus* mushrooms were grown in the United States, a 50 percent decrease over the prior year and a 52 percent decrease over the POI. Despite this decrease, the number of mushrooms sold for processing increased by 2.3 million pounds over the POI to 66.7 million pounds in 2021. Mushrooms are grown indoors in highly controlled growing environments allowing for steady production throughout the year, with no seasonal

[19] USDA, NASS, Agaricus Production, Agaricus Processing Sales, accessed April 19, 2022.

[20] The average price received for raw processing mushrooms over the POI was $0.70 per lb compared with $1.39 for fresh mushrooms. USDA, NASS, Agaricus Processing Price Received, Agaricus Fresh Price Received, accessed April 19, 2022.

[21] Morris, "The one tiny region that produces nearly half…" May 16, 2014, https://modernfarmer.com/2014/05/welcome-mushroom-country-population-nearly-half-u-s-mushrooms/; Conference, p 102 (Loiseau); STR Respondents' post-conference brief, p. 11.

[22] Kekkilä-BVB, "Futuristic fungiculture in the Netherlands," February 17, 2022, https://www.kekkila-bvb.com/article/futuristic-fungiculture-in-the-netherlands/; MushroomForum, "The Spanish mushroom industry restarts," September 10, 2021, https://www.gombaforum.hu/en/2021/gazdasag/ujraindul-a-spanyol-gombaipar/; STR Respondents' post-conference brief, pp. 11-14; Coalition of Foreign Producers' post-conference brief, p. 7.

[23] Kekkilä-BVB, "Futuristic fungiculture in the Netherlands," February 17, 2022, https://www.kekkila-bvb.com/article/futuristic-fungiculture-in-the-netherlands/; STR Respondents' post-conference brief, pp. 11-14; Coalition of Foreign Producers' post-conference brief, pp. 6-7.

break in many locations, including the United States.[24] However, in Spain, mushroom growing operations focused on supplying the processing industry stopped mushroom production between mid-June to mid-September due to prohibitively high cooling costs, resulting in Spanish processors halting production of processed mushroom products.[25] Despite reports of labor shortages and scarce inputs in the U.S. mushroom industry leading to unharvested mushrooms and lower yields, the sole responding preserved mushroom producer in the United States (Giorgio, which is affiliated with mushroom growers) reported that there are no raw mushroom supply issues.[26]

To make certain preserved mushrooms, raw mushrooms are cleaned and cooked quickly by blanching in hot water within 24 hours of harvest. Next, the mushrooms are sliced as needed depending on the form of the final product, dewatered, and checked for any foreign metal material using metal detectors. The final steps involve filling the cans or jars with mushrooms, checking the weight, adding additional ingredients such as water, brine, and preservatives, and then vacuum sealing the container and heat sterilizing it. This general process is the same regardless of the size of the can or jar.[27] Foreign producers indicate they have developed advanced machinery and production lines such as belt blanchers and coolers and a vacuum transport system for blanched and sliced mushrooms.[28] The U.S. industry reports that they cannot make larger sized cans of preserved mushrooms on the same manufacturing lines, while Polish, Dutch, and Spanish producers report that they can easily switch can sizes, including larger can sizes.[29]

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[24] Morris, "The one tiny region that produces nearly half…" May 16, 2014, https://modernfarmer.com/2014/05/welcome-mushroom-country-population-nearly-half-u-s-mushrooms/; Kekkilä-BVB, "Futuristic fungiculture in the Netherlands," February 17, 2022, https://www.kekkila-bvb.com/article/futuristic-fungiculture-in-the-netherlands/; Conference, p. 101 (Loiseau).

[25] MushroomForum, "The Spanish mushroom industry restarts," September 10, 2021, https://www.gombaforum.hu/en/2021/gazdasag/ujraindul-a-spanyol-gombaipar/.

[26] Bradham, "Labor shortage forces Pennsylvania mushroom farms to dump crops," June 25, 2021, https://www.bloomberg.com/news/newsletters/2021-06-25/labor-shortage-forces-pennsylvania-mushroom-farms-to-dump-crops; Produce News, "Short supply of mushrooms this holiday season," October 27, 2021, https://theproducenews.com/mushrooms/short-supply-mushrooms-holiday-season; STR Respondents' post-conference brief, Exhibit 7; Conference, p. 41, p. 45, and pp. 109-110 (Loiseau).

[27] Petition, p. 7.

[28] Coalition of Foreign Producers' post-conference brief, p. 7.

[29] Conference, p. 11 (Loiseau); Petitioner's post-conference brief, pp. 6-7; Coalition of Foreign Producers' post-conference brief, pp. 3-4.

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposes a single domestic like product that is coextensive with the scope of these investigations.[30] Respondent Acme took no position concerning Petitioner's proposed domestic like product definition for the purposes of the preliminary determinations[31] and no other respondents addressed domestic like product during the preliminary phase. No party made domestic like product arguments in prehearing or posthearing briefs and no party requested data collection for a domestic like product analysis in their comments on draft questionnaires.

During the preliminary phase of these investigations, the Commission conducted a six-factor like product analysis to determine whether to include out-of-scope certain preserved mushrooms in containers that hold greater than 12 ounces drained weight in the definition of the domestic like product. The Commission concluded that the domestic like product should not include out-of-scope certain preserved mushrooms in containers that hold greater than 12 ounces drained weight, and consequently defined a single domestic like product consisting of all domestically produced certain preserved mushrooms, coextensive with the scope.[32]

[30] Petitioner's postconference brief, p. 3.

[31] Respondent Acme's postconference brief, p. 3.

[32] Certain Preserved Mushrooms from France, Netherlands, Poland, and Spain Inv. Nos. 731-TA-1587-1590 (Preliminary), USITC Publication 5329, May 2022, pp. 8-12.

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

U.S. market characteristics

Certain preserved mushrooms are sold to industrial users, food service customers, and retailers. Industrial users such as frozen-food manufacturers purchase large quantities that they use in producing packaged foods. Food service customers include restaurant and institutional customers as well as distributors to such firms. Retail customers mainly consist of grocery stores or discount stores that also sell groceries. Retail users purchase small containers: 4- and 8- ounce cans or jars of drained weight of certain preserved mushrooms. Retail users may purchase certain preserved mushrooms under the manufacturers' label ("branded") or under their own retail label ("private label.")[1]

Certain preserved mushrooms are sold as whole mushrooms, sliced mushrooms, or as stems and pieces. Whole mushrooms are mainly sold to retailers and are usually small, attractive, and of uniform size. Sliced mushrooms also must be made of small, attractive, and uniform sized-mushrooms and must show a complete silhouette of the mushroom. Sliced and whole mushrooms may be sold in glass jars as well as cans. Piece and stems account for 75 percent of the entire U.S. market and 95 percent of sales to food service and industrial customers. Pieces and stems are typically sold in cans, not in glass jars. Lower-quality mushrooms, such as broken or more mature mushrooms, are used for pieces and stems.[2]

Historically, U.S. producers sell not only certain preserved mushrooms but also produce and sell other forms of mushrooms, including packaged fresh whole or sliced mushrooms as well as products containing mushrooms.[3]

As described below, demand for certain preserved mushrooms increased during the COVID-19 pandemic due to increased demand for shelf-stable food. Apparent U.S. consumption of certain preserved mushrooms increased *** percent during 2019-21, and then was *** percent lower in the first half of 2022 compared to the first half of 2021.

In these investigations, Giorgio was the only firm that responded to the U.S. producers' questionnaire. It represents *** of the domestic industry. Subject imports comprised *** percent of the quantity of the U.S. market in 2021, the domestic producer's shipments

[1] U.S. producer described the certain preserved mushrooms used in branded and private label product as exactly the same, with the only difference being the label. Hearing transcript, p. 81 (Loiseau).

[2] *Certain Preserved Mushrooms from Chile, China, India, and Indonesia.* Inv. Nos. 731-TA-776-779 (Review), October 2004, pp. II-1–II-2. Brad Hudgens, economist for petitioner, confirmed this description is still accurate in 2022. See email from Brad Hudgens, November 28, 2022.

[3] Petitioner's postconference brief, pp. 16-17.

comprised *** percent of the U.S. market, nonsubject imports from the Netherlands were *** percent of the market, and other nonsubject imports were *** percent.

The U.S. producer and 16 importers indicated that there had not been any significant changes in the product range, product mix, or marketing of certain preserved mushrooms since January 1, 2019.

U.S. purchasers

The Commission received nine usable questionnaire responses from firms that had purchased certain preserved mushrooms during January 2019-June 2022.[4] These purchasers' 2021 purchases represented approximately *** of U.S. apparent consumption of preserved mushrooms in 2021.[5]

Large purchasers of certain preserved mushrooms include ***. ***. ***.

Six responding purchasers are retailers, one (***) is a food products producer, one (***) is a distributor, and one (***) is a (***).[6] Most responding U.S. retail purchasers had retail outlets in large portions (or all) of the United States. Other purchasers (such as ***) sold to grocery chains.

Three purchasers (***) listed Giorgio as a supplier. Six purchasers indicated experience with U.S. product, two with French product, six with Dutch product, three with Polish product, one with Spanish product, and three with product from other countries (Indonesia and Thailand). In terms of actual purchases between January 2019

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

[5] ***.

[6] ***.

and June 2022, four purchased domestic certain preserved mushrooms, two purchased imports of the subject merchandise from France, six purchased imports of the subject merchandise from the Netherlands, three purchased imports of the subject imports from Poland, one purchased subject imports from Spain, and four purchased imports of certain preserved mushrooms from other sources.[7]

Channels of distribution

Giorgio, the sole responding U.S. producer, sold *** products mostly to *** with a majority of products being ***. Importers sold the majority of subject imports that were private label products to retailers, as shown in table II-1. *** shipments of imports from France, Poland, and Spain were private label sold to retailers. *** subject Dutch product was also private label sold to retailers, although ***.

Table II-1
Certain preserved mushrooms: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	Branding	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Distributor	Branded	***	***	***	***	***
United States	Distributor	Private label	***	***	***	***	***
United States	Retailer	Branded	***	***	***	***	***
United States	Retailer	Private label	***	***	***	***	***
United States	Other	Branded	***	***	***	***	***
United States	Other	Private label	***	***	***	***	***
France	Distributor	Branded	***	***	***	***	***
France	Distributor	Private label	***	***	***	***	***
France	Retailer	Branded	***	***	***	***	***
France	Retailer	Private label	***	***	***	***	***
France	Other	Branded	***	***	***	***	***
France	Other	Private label	***	***	***	***	***
Netherlands, subject	Distributor	Branded	***	***	***	***	***
Netherlands, subject	Distributor	Private label	***	***	***	***	***
Netherlands, subject	Retailer	Branded	***	***	***	***	***
Netherlands, subject	Retailer	Private label	***	***	***	***	***
Netherlands, subject	Other	Branded	***	***	***	***	***
Netherlands, subject	Other	Private label	***	***	***	***	***

Table continued.

[7] Several purchasers noted difficulties in identifying sources of product. ***

Table II-1 Continued
Certain preserved mushrooms: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	Branding	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Poland	Distributor	Branded	***	***	***	***	***
Poland	Distributor	Private label	***	***	***	***	***
Poland	Retailer	Branded	***	***	***	***	***
Poland	Retailer	Private label	***	***	***	***	***
Poland	Other	Branded	***	***	***	***	***
Poland	Other	Private label	***	***	***	***	***
Spain	Distributor	Branded	***	***	***	***	***
Spain	Distributor	Private label	***	***	***	***	***
Spain	Retailer	Branded	***	***	***	***	***
Spain	Retailer	Private label	***	***	***	***	***
Spain	Other	Branded	***	***	***	***	***
Spain	Other	Private label	***	***	***	***	***
Subject sources	Distributor	Branded	***	***	***	***	***
Subject sources	Distributor	Private label	***	***	***	***	***
Subject sources	Retailer	Branded	***	***	***	***	***
Subject sources	Retailer	Private label	***	***	***	***	***
Subject sources	Other	Branded	***	***	***	***	***
Subject sources	Other	Private label	***	***	***	***	***
Netherlands, nonsubject	Distributor	Branded	***	***	***	***	***
Netherlands, nonsubject	Distributor	Private label	***	***	***	***	***
Netherlands, nonsubject	Retailer	Branded	***	***	***	***	***
Netherlands, nonsubject	Retailer	Private label	***	***	***	***	***
Netherlands, nonsubject	Other	Branded	***	***	***	***	***
Netherlands, nonsubject	Other	Private label	***	***	***	***	***
All other nonsubject	Distributor	Branded	***	***	***	***	***
All other nonsubject	Distributor	Private label	***	***	***	***	***
All other nonsubject	Retailer	Branded	***	***	***	***	***
All other nonsubject	Retailer	Private label	***	***	***	***	***
All other nonsubject	Other	Branded	***	***	***	***	***
All other nonsubject	Other	Private label	***	***	***	***	***
Nonsubject sources	Distributor	Branded	***	***	***	***	***
Nonsubject sources	Distributor	Private label	***	***	***	***	***
Nonsubject sources	Retailer	Branded	***	***	***	***	***
Nonsubject sources	Retailer	Private label	***	***	***	***	***
Nonsubject sources	Other	Branded	***	***	***	***	***
Nonsubject sources	Other	Private label	***	***	***	***	***

Table continued.

Table II-1 Continued
Certain preserved mushrooms: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	Branding	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
All import sources	Distributor	Branded	***	***	***	***	***
All import sources	Distributor	Private label	***	***	***	***	***
All import sources	Retailer	Branded	***	***	***	***	***
All import sources	Retailer	Private label	***	***	***	***	***
All import sources	Other	Branded	***	***	***	***	***
All import sources	Other	Private label	***	***	***	***	***

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

Note: Distributors means “distributors and wholesalers.” Retailers means “retailers and grocery stores.” Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Geographic distribution

The sole responding U.S. producer reported selling certain preserved mushrooms to ***, and most importers reported selling certain preserved mushrooms to all regions in the contiguous United States (table II-2). For the U.S. producer, *** percent of its sales were within 100 miles of its production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. points of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table II-2
Certain preserved mushrooms: Count of U.S. producers’ and U.S. importers’ geographic markets

Region	U.S. producers	France	Netherlands	Poland	Spain	Subject sources
Northeast	***	***	12	4	4	14
Midwest	***	***	11	4	3	13
Southeast	***	***	11	4	3	14
Central Southwest	***	***	9	3	3	11
Mountain	***	***	5	2	2	7
Pacific Coast	***	***	10	3	4	12
Other	***	***	0	0	1	1
All regions (except Other)	***	***	4	1	2	6
Reporting firms	***	***	13	5	4	15

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

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

Supply and demand considerations

U.S. supply

U.S. producer Giorgio described itself as producing certain preserved mushrooms using mushrooms purchased mostly from affiliate growers, although it does also purchase some mushrooms from non-affiliated growers. It added that the there are approximately one billion pounds of fresh mushrooms available in the United States each year, and certain preserved mushroom production only uses 12-13 percent of that supply.[8] Giorgio also described U.S. mushroom growing as generally using three yields per bed of soil used. It continued that a larger share of the third yield is devoted to certain preserved mushrooms than of the first yield.[9]

Table II-3 provides a summary of the supply factors regarding certain preserved mushrooms from the U.S. producer and from subject countries. Capacity in most countries in the table was relatively constant over 2019-21, ***.

[8] Hearing transcript, pp. 70-71 (Loiseau).
[9] Hearing transcript, pp. 114-15 (Loiseau).

Table II-3
Certain preserved mushrooms: Supply factors that affect the ability to increase shipments to the U.S. market, by country

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

Factor	Measure	United States	France	Netherlands, subject	Poland	Spain
Capacity 2019	Quantity	***	***	***	***	***
Capacity 2021	Quantity	***	***	***	***	***
Capacity utilization 2019	Ratio	***	***	***	***	***
Capacity utilization 2021	Ratio	***	***	***	***	***
Inventories to total shipments 2019	Ratio	***	***	***	***	***
Inventories to total shipments 2021	Ratio	***	***	***	***	***
Home market shipments 2021	Share	***	***	***	***	***
Non-US export market shipments 2021	Share	***	***	***	***	***
Ability to shift production (firms reporting “yes”)	Count	***	***	***	***	***

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

Note: Data for France come from ***. The responding U.S. producer accounted for the vast majority of U.S. production of certain preserved mushrooms in 2021. Responding foreign producer/exporter firms accounted for the majority of U.S. imports from France, more than half of subject U.S. imports of certain preserved mushrooms from the Netherlands and Poland during 2021, and somewhat under half of U.S. imports from Spain. 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.”

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 “---“.

Domestic production

Based on available information, the responding U.S. producer of certain preserved mushrooms has the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced certain preserved mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, relatively large inventories, and ***. The *** of capacity utilization suggests that the U.S. producer may have a large ability to increase production of certain preserved mushrooms in response to an increase in prices, but such a response also depends on the mushroom growers’ ability to increase the

amount they process and sell to domestic producers.[10] Okechamp stated that the U.S. certain preserved mushrooms relies on supplies of fresh mushrooms that are picked by hand, whereas the Dutch and Polish industries use mushrooms grown using automated composting and harvesting.[11] Purchaser Purcell added that European suppliers of certain preserved mushrooms rely on mushrooms grown specifically for canning, whereas the U.S. industry uses mushrooms mostly grown for the fresh mushroom market.[12]

Of the three previously known producers of smaller 4 and 8 oz certain preserved mushrooms, Monterey Mushrooms closed its production facility in 2019, and Sunny Dell Foods reduced its operations.[13] Giorgio's capacity *** from 2019 to 2021.

Subject imports from France

Based on available information (specifically, the ***),[14] the *** responding producer of certain preserved mushrooms from France has the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of certain preserved mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply are some available capacity, limited alternate markets other than the United States and France, some inventories, and an ability to produce alternate products.

Subject imports from the Netherlands

Based on available information, producers of certain preserved mushrooms from the Netherlands have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of certain preserved mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply are relatively limited unused capacity, the existence of large alternate markets, and some available inventory.

Subject imports from Poland

Based on available information, Polish producers of certain preserved mushrooms have the ability to respond to changes in demand with moderate-to-large changes in the quantity of

[10] Conference transcript, pp. 101-102, (Loiseau).
[11] Hearing transcript, pp. 137-38 (Ejsmont).
[12] Hearing transcript, p. 142 (Purcell) and posthearing brief of Polish, Dutch, and Spanish producers, p. 4.
[13] Conference transcript, pp. 10-14, (Loiseau).
[14] See Part VII and Appendix D.

shipments of certain preserved mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the ability to shift shipments from alternate markets and production from alternate products. Factors mitigating responsiveness include somewhat limited availability of unused capacity and inventories.

Subject imports from Spain

Based on available information, producers of certain preserved mushrooms from Spain have the ability to respond to changes in demand with large changes in the quantity of shipments of certain preserved mushrooms to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the low capacity utilization rates and the existence of alternate markets, although these may be somewhat constrained by the *** inventory levels.

Imports from nonsubject sources

Nonsubject imports accounted for approximately *** percent of total U.S. imports in 2021.[15] Sources of nonsubject imports include Indonesia.

Supply constraints

The U.S. producer *** supply constraints between January 1, 2019 and March 31, 2022 (when the petitions in these investigations were filed). Eight responding importers and five purchasers reported that they had experienced supply constraints during this period, but eight importers and four purchasers indicated that they had not.

*** described ***.

Importers described multiple reasons for experiencing supply constraints since January 1, 2019, including two importers that cited COVID-related supply chain delays and two that

[15] See Appendix C.

cited ocean freight delays. Importer *** adds that there were periodic stock outages due to increased demand and raw material shortages, and importer *** described turning down new customers due to labor shortage "as domestic suppliers could not fill current demand" in 2022. Importer *** indicated that it had difficulty securing supply from the Netherlands in 2022 due to an issue between its vendor and the vendor's supplier. Importer *** stated that one supplier was not compliant with Customs and Border Protection regulations. Importer *** stated that due to supply chain issues, it had been late on some deliveries to customers and had refused to quote some potential new customers.

Among purchasers, *** indicated that Giorgio suspended shipments of ***. *** stated that ***. *** stated that there had been allocations from vendors, supply shortages, and/or "timing flux." *** added that supply shortages were due to labor and raw material constraints. *** indicated that there was limited availability of organic mushrooms.

***, nine importers, and six purchasers indicated that they had not experienced any supply constraints since March 31, 2022. Eight importers indicated that they had experienced supply constraints in the period, often describing the same issues (ocean freight issues, raw material shortages, vendor disputes, etc.) as they cited in the period before March 31, 2022. In addition to those issues, importer *** described the Spanish transportation strikes, EU fertilizer shortages, and Spanish heat waves (reducing mushroom harvests) as supply constraints. Importer *** stated that it had had no new orders. ***, which described supply shortages were due to labor and raw material constraints.

When asked if the availability of U.S.-produced certain preserved mushrooms in the U.S. market had changed since January 1, 2019, five purchasers responded that it had while one responded that it had not. The five that stated that it had described the same issues as described above by suppliers, such as supply not matching the increased demand during the COVID-19 pandemic, issues with ***, lack of availability of organic mushrooms, and general shortages of product. When asked if the availability of subject imports had changed in the same time period, three purchasers stated that it had (citing the same supply shortages and COVID-19 pandemic issues as cited for U.S. availability), and three stated

that it had not. Two purchasers stated that the availability of nonsubject imports had not changed, and one stated that it had.

New suppliers

Eight purchasers indicated that no new suppliers had entered the U.S. market since January 1, 2019. (No other purchaser responded.)

U.S. demand

Based on available information, the overall demand for certain preserved mushrooms is likely to experience moderate changes in response to changes in price. The main contributing factor is that certain preserved mushrooms are a final good sold to the ultimate consumer and there are no substitutes for certain preserved mushrooms.[16] Additionally, recent awareness of the health benefits of mushrooms has increased their demand and popularity.[17] However, certain preserved mushrooms are not an essential food staple, and if the price of certain preserved mushrooms increases too much, then demand could fall.

End uses and cost share

As noted above, certain preserved mushrooms are generally sold to consumers in retail stores, although purchaser ***.

Business cycles

***, 13 of 16 importers,[18] and seven of nine purchasers indicated that the certain preserved mushrooms market was not subject to business cycles or conditions of competition. *** importers and two purchasers stated that it was. Purchaser *** described the COVID-19 pandemic as causing an increase in demand for shelf-stable products. Purchaser *** and importer *** described increased seasonal demand during Easter, Thanksgiving, Christmas, and/or New Year's.[19]

[16] Conference transcript, p. 10 (Loiseau).
[17] H-E-B postconference brief, p. 4.
[18] An additional importer, ***, did not answer questions in this section of its questionnaire.
[19] Importer *** listed competition among sellers as a unique condition of competition in the certain preserved mushroom industry, but did not elaborate.

Six importers and three U.S. purchasers stated that there had not been changes in the U.S. certain preserved mushroom market since January 1, 2019, and three purchasers and one importer stated that there had been. Purchaser *** described the COVID-19 pandemic as causing a "surge" in demand and added that the market is still "normalizing." Purchasers *** also described the COVID-19 pandemic as having affected the certain preserved mushrooms market. Importer *** indicated that the U.S. certain preserved mushroom industry had become more consolidated.

Demand trends

Most importers and purchasers reported an increase in U.S. demand for certain preserved mushrooms since January 1, 2019, *** (table II-4). Six of the importers indicating that demand had increased offered further elaboration that the increase was due to increased incidence of consumers eating at home due to the COVID-19 pandemic. Four importers indicated that this phenomenon also drove increased foreign demand, and *** added that such demand had increased particularly in Asia. However, importer ***, which described unchanged foreign demand, stated that the global market for certain preserved mushrooms was "saturated."

Among purchasers, *** indicated that demand had risen in 2020 due to increased demand for shelf-stable canned goods during the COVID-19 pandemic. *** elaborated that the 2020 increase was 20 percent, followed by a 2021 decrease of 13 percent. It added that in 2022, nominal dollar sales are up almost 5 percent, but unit sales (quantity) are down almost 12 percent due to inflation. Purchaser *** similarly described an increase in demand in 2020 with demand decreasing in 2022.

Table II-4
Certain preserved mushrooms: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Market	Firm type	Increase	No change	Decrease	Fluctuate
Domestic demand	U.S. producer	***	***	***	***
Domestic demand	Importers	8	4	0	2
Domestic demand	Purchasers	4	0	0	2
Foreign demand	U.S. producer	***	***	***	***
Foreign demand	Importers	4	5	0	1
Foreign demand	Purchasers	1	0	0	1

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

Substitute products

Substitutes for certain preserved mushrooms are limited. ***, 13 importers, and seven purchasers reported that there were no substitutes. *** indicated that fresh mushrooms can be a substitute for certain preserved mushrooms at the retail consumer level but added that changes in the price of fresh mushrooms had not affected the prices of certain preserved mushrooms.

Substitutability issues

This section assesses the degree to which U.S.-produced certain preserved mushrooms and imports of certain preserved mushrooms from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of certain preserved mushrooms from domestic and imported sources based on those factors. Based on available data, staff believes that there is a mostly high degree of substitutability between domestically produced certain preserved mushrooms and certain preserved mushrooms imported from subject sources.[20] Factors contributing to this level of substitutability include similar quality, little preference for particular country of origin or specific producers, interchangeability between domestic and subject sources, similarities between domestically produced certain preserved mushrooms and certain preserved mushrooms imported from subject countries, and limited significant factors other than price. Factors reducing substitutability include some reports of limited domestic availability and some indication from purchasers that factors other than price were important in comparing U.S. product with that imported from subject countries.

Purchaser decisions based on source

Eight purchasers indicated that neither they nor their customers order certain preserved mushrooms from one country source over other sources of supply. However, *** indicated that it purchases a ***.

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

Four purchasers indicated that there are not any types of certain preserved mushrooms that are only available from a single country source. Purchaser *** stated that product made with portobello mushrooms are not available from European suppliers, but it added that this product is a small-volume item. Purchaser *** stated that it had seen "no indication" from U.S. suppliers that they are willing to provide private label product in addition to branded product. It continued that as a result, it ***.[21]

As shown in table II-5, most purchasers and their customers sometimes or never make purchasing decisions based on the producer or country of origin. The two purchasers that explained why they sometimes make decisions based the manufacturer stated that purchasing factors included quality, food safety, supply stability, supplier capacity, availability, relationship, and ability to pass U.S. government regulations. *** stated that it minimizes its purchases from China. *** stated that it always purchases based on producer and country of origin ***. *** stated that its customers trust its brands and may sometimes purchase based on producer and country of origin, but it did not know for certain.

Table II-5
Certain preserved mushrooms: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	1	0	3	5
Customer	Producer	0	0	2	6
Purchaser	Country	1	0	4	4
Customer	Country	0	0	3	5

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

Importance of purchasing domestic

Eight purchasers reported that none of their purchases required purchasing U.S.-produced product. (No other purchaser responded.)

[21] Additionally, at the hearing and in posthearing briefs, the petitioner and H-E-B disagreed over whether Giorgio had offered to supply certain preserved mushrooms to H-E-B under a private-label agreement in late 2021. See Petitioner's posthearing brief pp. 12-13 and attachment 5, H-E-B's posthearing brief, pp. 1-2 and attachment 1, and hearing transcript pp. 32-34 (Loiseau).

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for certain preserved mushrooms were price/value/cost (eight firms), quality (eight firms), and availability/supply capacity (seven firms), as shown in table II-6.

Table II-6
Certain preserved mushrooms: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price/Value/Cost	4	1	3	8
Quality	3	3	2	8
Availability/Supply Capacity	2	4	1	7
Country of Origin	0	1	0	1
Known Supplier	0	0	1	1
Logistics Efficiency	0	0	0	1
All other factors	0	0	0	0

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

Note: Additional factors (after the top three) include product range and availability of private label product.

Six purchasers reported that they sometimes purchase the lowest-priced product while three indicated that they usually do.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 16 factors in their purchasing decisions (table II-7). The factors rated as very important by more than half of responding purchasers were product consistency (nine purchasers), quality meets standards (nine), availability overall (eight), price (eight), reliability of supply (eight), delivery terms (seven), delivery time (seven), availability of private label (five), and quality exceeds standards (five).

In defining the quality of preserved mushrooms, firms described quality as including taste, color, size, consistency, texture, aroma, drain weight, and freshness.

Table II-7
Certain preserved mushrooms: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Availability (overall)	8	1	0
Availability of private label	5	2	2
Delivery terms	7	2	0
Delivery time	7	2	0
Discounts offered	1	6	2
Minimum quantity requirements	3	4	2
Packaging	4	5	0
Payment terms	4	5	0
Price	8	1	0
Product consistency	9	0	0
Product range	3	4	2
Quality meets industry standards	9	0	0
Quality exceeds industry standards	5	4	0
Reliability of supply	8	1	0
Technical support/service	1	6	2
U.S. transportation costs	4	4	1

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

Lead times

Certain preserved mushrooms are primarily sold from inventory. The U.S. producer reported that 100 percent of its commercial shipments were *** with lead times averaging *** days. U.S. importers sold *** percent of their commercial shipments from U.S. inventories, with lead times of *** days. They sold another *** percent from foreign inventories, with lead times of *** days. The remaining *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days.

Supplier certification

Six responding purchasers require their suppliers to become certified or qualified to sell certain preserved mushrooms to their firm. Purchasers reported that the time to qualify a new supplier ranged from 30 to 180 days (with most 90 days or fewer). Qualification can involve site audits, food safety plans, HACCP plans, microchemical testing, and/or examination of supply stability. *** indicated that importers must pass the U.S. FDA's foreign supplier verification program. Three purchasers (***) did not require certification.

*** purchasers reported that no domestic or foreign supplier had failed in its attempt to qualify certain preserved mushrooms or had lost its approved status since 2019.

Minimum quality specifications

As can be seen from table II-8, six responding purchasers reported that domestically produced product always or usually met minimum quality specifications. Additionally, all purchasers that could compare reported that the subject and nonsubject imports of certain preserved mushrooms always or usually met minimum quality specifications.

Table II-8
Certain preserved mushrooms: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	4	2	0	0	2
France	0	2	0	0	6
Netherlands	4	2	0	0	2
Poland	1	2	0	0	5
Spain	0	1	0	0	7
Nonsubject sources	1	0	0	0	5

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

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

Changes in purchasing patterns

Six purchasers indicated that they had not changed suppliers since January 1, 2019. Three indicated that they had. *** indicated that it had done so for reasons of price and timely delivery. *** stated that it had added *** due to supply shortages and *** due to ***. *** stated that it had ***.

Purchasers were asked about changes in their purchasing patterns from different sources since 2019 (table II-9). A majority of responding purchasers indicated that their purchases of U.S. product had fluctuated, as did (smaller) majorities of responding purchasers for Polish and Spanish product and half of responding purchasers for product imported from France and the Netherlands. Two responding purchasers indicated purchasing more Dutch product, and one indicated purchasing more Polish product. One responding purchaser indicated that it purchased less French product. Reasons cited for trends included the COVID-19 pandemic (and increased consumer demand for shelf-stable goods), supply and demand changes, and one-time purchases.

Table II-9
Certain preserved mushrooms: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Decreased	Increased	Constant	Fluctuated
United States	0	0	1	3
France	1	0	0	1
Netherlands	0	2	1	3
Poland	0	1	0	2
Spain	0	0	0	1
Nonsubject sources	0	0	0	1
Sources unknown	0	0	0	1

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

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

Purchasers were asked a number of questions comparing certain preserved mushrooms produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 16 factors (tables II-10) for which they were asked to rate the importance.

Most purchasers reported that U.S. and subject certain preserved mushrooms were comparable on most factors, although some firms described a few factors as different. For example, one firm each described U.S. product as superior to product imported from France, the Netherlands, and Poland in delivery time and U.S. transportation costs. Additionally, one firm described U.S. product as superior to Spanish product in availability of private label product and in reliability of supply.

Purchasers also generally described subject and nonsubject product as comparable in most factors, although few purchasers made such comparisons. ***.

Table II-10
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. France	0	1	0
Availability of private label	US v. France	0	1	0
Delivery terms	US v. France	0	1	0
Delivery time	US v. France	1	0	0
Discounts offered	US v. France	0	1	0
Minimum quantity requirements	US v. France	0	1	0
Packaging	US v. France	0	1	0
Payment terms	US v. France	0	1	0
Price	US v. France	0	1	0
Product consistency	US v. France	0	1	0
Product range	US v. France	0	1	0
Quality meets industry standards	US v. France	0	1	0
Quality exceeds industry standards	US v. France	0	1	0
Reliability of supply	US v. France	0	1	0
Technical support/service	US v. France	0	1	0
U.S. transportation costs	US v. France	1	0	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Netherlands	0	4	0
Availability of private label	US v. Netherlands	0	4	0
Delivery terms	US v. Netherlands	0	4	0
Delivery time	US v. Netherlands	1	3	0
Discounts offered	US v. Netherlands	0	4	0
Minimum quantity requirements	US v. Netherlands	0	4	0
Packaging	US v. Netherlands	0	4	0
Payment terms	US v. Netherlands	0	4	0
Price	US v. Netherlands	0	4	0
Product consistency	US v. Netherlands	0	4	0
Product range	US v. Netherlands	0	4	0
Quality meets industry standards	US v. Netherlands	0	4	0
Quality exceeds industry standards	US v. Netherlands	0	4	0
Reliability of supply	US v. Netherlands	0	4	0
Technical support/service	US v. Netherlands	0	4	0
U.S. transportation costs	US v. Netherlands	1	3	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Poland	0	2	0
Availability of private label	US v. Poland	0	2	0
Delivery terms	US v. Poland	0	2	0
Delivery time	US v. Poland	1	1	0
Discounts offered	US v. Poland	0	2	0
Minimum quantity requirements	US v. Poland	0	2	0
Packaging	US v. Poland	0	2	0
Payment terms	US v. Poland	0	2	0
Price	US v. Poland	0	2	0
Product consistency	US v. Poland	0	2	0
Product range	US v. Poland	0	2	0
Quality meets industry standards	US v. Poland	0	2	0
Quality exceeds industry standards	US v. Poland	0	2	0
Reliability of supply	US v. Poland	0	2	0
Technical support/service	US v. Poland	0	2	0
U.S. transportation costs	US v. Poland	1	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Spain	0	1	0
Availability of private label	US v. Spain	0	1	0
Delivery terms	US v. Spain	0	1	0
Delivery time	US v. Spain	1	0	0
Discounts offered	US v. Spain	0	1	0
Minimum quantity requirements	US v. Spain	0	1	0
Packaging	US v. Spain	0	1	0
Payment terms	US v. Spain	0	1	0
Price	US v. Spain	0	1	0
Product consistency	US v. Spain	0	1	0
Product range	US v. Spain	0	1	0
Quality meets industry standards	US v. Spain	0	1	0
Quality exceeds industry standards	US v. Spain	0	1	0
Reliability of supply	US v. Spain	0	1	0
Technical support/service	US v. Spain	0	1	0
U.S. transportation costs	US v. Spain	1	0	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Nonsubject	0	1	0
Availability of private label	US v. Nonsubject	0	1	0
Delivery terms	US v. Nonsubject	0	1	0
Delivery time	US v. Nonsubject	1	0	0
Discounts offered	US v. Nonsubject	0	1	0
Minimum quantity requirements	US v. Nonsubject	0	1	0
Packaging	US v. Nonsubject	0	1	0
Payment terms	US v. Nonsubject	0	1	0
Price	US v. Nonsubject	0	1	0
Product consistency	US v. Nonsubject	0	1	0
Product range	US v. Nonsubject	0	1	0
Quality meets industry standards	US v. Nonsubject	0	1	0
Quality exceeds industry standards	US v. Nonsubject	0	1	0
Reliability of supply	US v. Nonsubject	0	1	0
Technical support/service	US v. Nonsubject	0	1	0
U.S. transportation costs	US v. Nonsubject	1	0	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	France v. Netherlands	0	1	0
Availability of private label	France v. Netherlands	0	2	0
Delivery terms	France v. Netherlands	0	1	0
Delivery time	France v. Netherlands	0	1	0
Discounts offered	France v. Netherlands	0	1	0
Minimum quantity requirements	France v. Netherlands	0	1	0
Packaging	France v. Netherlands	0	1	0
Payment terms	France v. Netherlands	0	1	0
Price	France v. Netherlands	0	1	0
Product consistency	France v. Netherlands	0	1	0
Product range	France v. Netherlands	0	1	0
Quality meets industry standards	France v. Netherlands	0	2	0
Quality exceeds industry standards	France v. Netherlands	0	1	0
Reliability of supply	France v. Netherlands	0	1	0
Technical support/service	France v. Netherlands	0	1	0
U.S. transportation costs	France v. Netherlands	0	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	France v. Poland	0	1	0
Availability of private label	France v. Poland	0	2	0
Delivery terms	France v. Poland	0	1	0
Delivery time	France v. Poland	0	1	0
Discounts offered	France v. Poland	0	1	0
Minimum quantity requirements	France v. Poland	0	1	0
Packaging	France v. Poland	0	1	0
Payment terms	France v. Poland	0	1	0
Price	France v. Poland	0	1	0
Product consistency	France v. Poland	0	1	0
Product range	France v. Poland	0	1	0
Quality meets industry standards	France v. Poland	0	2	0
Quality exceeds industry standards	France v. Poland	0	1	0
Reliability of supply	France v. Poland	0	1	0
Technical support/service	France v. Poland	0	1	0
U.S. transportation costs	France v. Poland	0	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	France v. Spain	0	1	0
Availability of private label	France v. Spain	0	1	0
Delivery terms	France v. Spain	0	1	0
Delivery time	France v. Spain	0	1	0
Discounts offered	France v. Spain	0	1	0
Minimum quantity requirements	France v. Spain	0	1	0
Packaging	France v. Spain	0	1	0
Payment terms	France v. Spain	0	1	0
Price	France v. Spain	0	1	0
Product consistency	France v. Spain	0	1	0
Product range	France v. Spain	0	1	0
Quality meets industry standards	France v. Spain	0	1	0
Quality exceeds industry standards	France v. Spain	0	1	0
Reliability of supply	France v. Spain	0	1	0
Technical support/service	France v. Spain	0	1	0
U.S. transportation costs	France v. Spain	0	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Netherlands v. Poland	0	1	0
Availability of private label	Netherlands v. Poland	0	2	0
Delivery terms	Netherlands v. Poland	0	1	0
Delivery time	Netherlands v. Poland	0	1	0
Discounts offered	Netherlands v. Poland	0	1	0
Minimum quantity requirements	Netherlands v. Poland	0	1	0
Packaging	Netherlands v. Poland	0	1	0
Payment terms	Netherlands v. Poland	0	1	0
Price	Netherlands v. Poland	0	1	0
Product consistency	Netherlands v. Poland	0	1	0
Product range	Netherlands v. Poland	0	1	0
Quality meets industry standards	Netherlands v. Poland	0	2	0
Quality exceeds industry standards	Netherlands v. Poland	0	1	0
Reliability of supply	Netherlands v. Poland	0	1	0
Technical support/service	Netherlands v. Poland	0	1	0
U.S. transportation costs	Netherlands v. Poland	0	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Netherlands v. Spain	0	1	0
Availability of private label	Netherlands v. Spain	0	1	0
Delivery terms	Netherlands v. Spain	0	1	0
Delivery time	Netherlands v. Spain	0	1	0
Discounts offered	Netherlands v. Spain	0	1	0
Minimum quantity requirements	Netherlands v. Spain	0	1	0
Packaging	Netherlands v. Spain	0	1	0
Payment terms	Netherlands v. Spain	0	1	0
Price	Netherlands v. Spain	0	1	0
Product consistency	Netherlands v. Spain	0	1	0
Product range	Netherlands v. Spain	0	1	0
Quality meets industry standards	Netherlands v. Spain	0	1	0
Quality exceeds industry standards	Netherlands v. Spain	0	1	0
Reliability of supply	Netherlands v. Spain	0	1	0
Technical support/service	Netherlands v. Spain	0	1	0
U.S. transportation costs	Netherlands v. Spain	0	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Poland v. Spain	0	1	0
Availability of private label	Poland v. Spain	0	1	0
Delivery terms	Poland v. Spain	0	1	0
Delivery time	Poland v. Spain	0	1	0
Discounts offered	Poland v. Spain	0	1	0
Minimum quantity requirements	Poland v. Spain	0	1	0
Packaging	Poland v. Spain	0	1	0
Payment terms	Poland v. Spain	0	1	0
Price	Poland v. Spain	0	1	0
Product consistency	Poland v. Spain	0	1	0
Product range	Poland v. Spain	0	1	0
Quality meets industry standards	Poland v. Spain	0	1	0
Quality exceeds industry standards	Poland v. Spain	0	1	0
Reliability of supply	Poland v. Spain	0	1	0
Technical support/service	Poland v. Spain	0	1	0
U.S. transportation costs	Poland v. Spain	0	1	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	France v. Nonsubject	0	1	0
Availability of private label	France v. Nonsubject	0	1	0
Delivery terms	France v. Nonsubject	0	1	0
Delivery time	France v. Nonsubject	1	0	0
Discounts offered	France v. Nonsubject	0	1	0
Minimum quantity requirements	France v. Nonsubject	0	1	0
Packaging	France v. Nonsubject	0	1	0
Payment terms	France v. Nonsubject	0	1	0
Price	France v. Nonsubject	0	1	0
Product consistency	France v. Nonsubject	0	1	0
Product range	France v. Nonsubject	0	1	0
Quality meets industry standards	France v. Nonsubject	0	1	0
Quality exceeds industry standards	France v. Nonsubject	0	1	0
Reliability of supply	France v. Nonsubject	0	1	0
Technical support/service	France v. Nonsubject	0	1	0
U.S. transportation costs	France v. Nonsubject	1	0	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Netherlands v. Nonsubject	0	1	0
Availability of private label	Netherlands v. Nonsubject	0	1	0
Delivery terms	Netherlands v. Nonsubject	0	1	0
Delivery time	Netherlands v. Nonsubject	1	0	0
Discounts offered	Netherlands v. Nonsubject	0	1	0
Minimum quantity requirements	Netherlands v. Nonsubject	0	1	0
Packaging	Netherlands v. Nonsubject	0	1	0
Payment terms	Netherlands v. Nonsubject	0	1	0
Price	Netherlands v. Nonsubject	0	1	0
Product consistency	Netherlands v. Nonsubject	0	1	0
Product range	Netherlands v. Nonsubject	0	1	0
Quality meets industry standards	Netherlands v. Nonsubject	0	1	0
Quality exceeds industry standards	Netherlands v. Nonsubject	0	1	0
Reliability of supply	Netherlands v. Nonsubject	0	1	0
Technical support/service	Netherlands v. Nonsubject	0	1	0
U.S. transportation costs	Netherlands v. Nonsubject	1	0	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Poland v. Nonsubject	0	1	0
Availability of private label	Poland v. Nonsubject	0	1	0
Delivery terms	Poland v. Nonsubject	0	1	0
Delivery time	Poland v. Nonsubject	1	0	0
Discounts offered	Poland v. Nonsubject	0	1	0
Minimum quantity requirements	Poland v. Nonsubject	0	1	0
Packaging	Poland v. Nonsubject	0	1	0
Payment terms	Poland v. Nonsubject	0	1	0
Price	Poland v. Nonsubject	0	1	0
Product consistency	Poland v. Nonsubject	0	1	0
Product range	Poland v. Nonsubject	0	1	0
Quality meets industry standards	Poland v. Nonsubject	0	1	0
Quality exceeds industry standards	Poland v. Nonsubject	0	1	0
Reliability of supply	Poland v. Nonsubject	0	1	0
Technical support/service	Poland v. Nonsubject	0	1	0
U.S. transportation costs	Poland v. Nonsubject	1	0	0

Table continued.

Table II-10 Continued
Certain preserved mushrooms: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	Spain v. Nonsubject	0	1	0
Availability of private label	Spain v. Nonsubject	0	1	0
Delivery terms	Spain v. Nonsubject	0	1	0
Delivery time	Spain v. Nonsubject	1	0	0
Discounts offered	Spain v. Nonsubject	0	1	0
Minimum quantity requirements	Spain v. Nonsubject	0	1	0
Packaging	Spain v. Nonsubject	0	1	0
Payment terms	Spain v. Nonsubject	0	1	0
Price	Spain v. Nonsubject	0	1	0
Product consistency	Spain v. Nonsubject	0	1	0
Product range	Spain v. Nonsubject	0	1	0
Quality meets industry standards	Spain v. Nonsubject	0	1	0
Quality exceeds industry standards	Spain v. Nonsubject	0	1	0
Reliability of supply	Spain v. Nonsubject	0	1	0
Technical support/service	Spain v. Nonsubject	0	1	0
U.S. transportation costs	Spain v. Nonsubject	1	0	0

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

Note: A rating of superior means that price/U.S. transportation cost of the first country in the pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported certain preserved mushrooms

In order to determine whether U.S.-produced certain preserved mushrooms can generally be used in the same applications as imports from France, the Netherlands, Poland, and Spain, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-11 to II-13, ***, while a majority of responding purchasers and importers generally reported that U.S. and subject mushrooms were always or frequently interchangeable. (For the comparison of U.S. and Spanish product, one responding importer described the products as always interchangeable, one as sometimes interchangeable, and the other as never interchangeable). Importers reported a wider range of responses when comparing product from specific subject countries to each other, with some importers indicating that such products were only sometimes interchangeable.

In further comments, importer *** stated that domestic and imported products are not interchangeable for its customers. Importer *** stated that there can be a quality difference between U.S. and Dutch product that can make the products sometimes not interchangeable. No purchaser reported any additional explanations.

Table II-11
Certain preserved mushrooms: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. France	***	***	***	***
U.S. vs. Netherlands	***	***	***	***
U.S. vs. Poland	***	***	***	***
U.S. vs. Spain	***	***	***	***
France vs. Netherlands	***	***	***	***
France vs. Poland	***	***	***	***
France vs. Spain	***	***	***	***
Netherlands vs. Poland	***	***	***	***
Netherlands vs. Spain	***	***	***	***
Poland vs. Spain	***	***	***	***
U.S. vs. Other	***	***	***	***
France vs. Other	***	***	***	***
Netherlands vs. Other	***	***	***	***
Poland vs. Other	***	***	***	***
Spain vs. Other	***	***	***	***

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

Table II-12
Certain preserved mushrooms: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. France	1	1	0	1
U.S. vs. Netherlands	5	2	1	1
U.S. vs. Poland	1	1	0	1
U.S. vs. Spain	1	0	1	1
France vs. Netherlands	2	3	2	0
France vs. Poland	2	1	2	0
France vs. Spain	2	0	2	0
Netherlands vs. Poland	2	1	2	0
Netherlands vs. Spain	2	1	2	0
Poland vs. Spain	2	0	2	0
U.S. vs. Other	0	1	0	0
France vs. Other	0	1	1	0
Netherlands vs. Other	0	2	1	0
Poland vs. Other	0	1	1	0
Spain vs. Other	0	1	1	0

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

Table II-13
Certain preserved mushrooms: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. France	0	1	0	0
U.S. vs. Netherlands	0	4	0	0
U.S. vs. Poland	0	2	0	0
U.S. vs. Spain	0	1	0	0
France vs. Netherlands	1	1	1	0
France vs. Poland	1	1	1	0
France vs. Spain	0	1	0	0
Netherlands vs. Poland	1	1	1	0
Netherlands vs. Spain	0	1	0	0
Poland vs. Spain	0	1	0	0
U.S. vs. Other	0	0	0	0
France vs. Other	0	0	0	0
Netherlands vs. Other	0	0	0	0
Poland vs. Other	0	0	0	0
Spain vs. Other	0	0	0	0

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 certain preserved mushrooms from the United States, subject, or nonsubject countries. As seen in tables II-14 to II-16, *** in comparing U.S. product to product from individual subject countries, while a majority of importers described such differences as always or frequently significant. Purchasers reported a wide variety of answers for the importance of factors other than price when comparing U.S. product to product from individual subject countries, including indicating that factors other than price were sometimes or never significant in comparisons of product from individual subject countries.

Table II-14
Certain preserved mushrooms: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. France	***	***	***	***
U.S. vs. Netherlands	***	***	***	***
U.S. vs. Poland	***	***	***	***
U.S. vs. Spain	***	***	***	***
France vs. Netherlands	***	***	***	***
France vs. Poland	***	***	***	***
France vs. Spain	***	***	***	***
Netherlands vs. Poland	***	***	***	***
Netherlands vs. Spain	***	***	***	***
Poland vs. Spain	***	***	***	***
U.S. vs. Other	***	***	***	***
France vs. Other	***	***	***	***
Netherlands vs. Other	***	***	***	***
Poland vs. Other	***	***	***	***
Spain vs. Other	***	***	***	***

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

Table II-15
Certain preserved mushrooms: Count of importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. France	1	2	1	0
U.S. vs. Netherlands	3	3	1	2
U.S. vs. Poland	1	2	1	0
U.S. vs. Spain	1	2	1	0
France vs. Netherlands	0	1	3	1
France vs. Poland	0	1	3	1
France vs. Spain	0	1	1	2
Netherlands vs. Poland	0	1	2	2
Netherlands vs. Spain	0	1	2	1
Poland vs. Spain	0	1	1	1
U.S. vs. Other	0	2	0	0
France vs. Other	0	2	0	0
Netherlands vs. Other	0	2	0	0
Poland vs. Other	0	2	0	0
Spain vs. Other	0	2	0	0

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

Table II-16
Certain preserved mushrooms: Count of purchasers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. France	1	0	1	0
U.S. vs. Netherlands	2	0	3	0
U.S. vs. Poland	1	1	1	0
U.S. vs. Spain	0	0	1	0
France vs. Netherlands	0	0	2	1
France vs. Poland	0	0	2	1
France vs. Spain	0	0	1	0
Netherlands vs. Poland	0	0	2	1
Netherlands vs. Spain	0	0	1	0
Poland vs. Spain	0	0	1	0
U.S. vs. other	0	0	0	0
France vs. Other	0	0	0	0
Netherlands vs. Other	0	0	0	0
Poland vs. Other	0	0	0	0
Spain vs. Other	0	0	0	0

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

In additional comments, importer *** stated that the Netherlands had higher capacity to meet U.S. demand. Importer *** stated that subject imports are higher quality than U.S. product. It added that it purchases product from all the subject countries in order to ensure year-long availability. Importer *** stated that the Netherlands and Poland grow mushrooms specifically for canning, whereas most U.S. mushrooms are grown for the fresh market. It added that as a result, the quality of Dutch and Polish certain preserved mushrooms is more stable, and the cost is lower. It continued that different production methods result in some differences between product from France, the Netherlands, and Poland.

Among purchasers, *** stated that Dutch product had advantages over U.S. product in availability, supply, and capacity. Purchaser *** stated that availability of U.S. product is less than the availability of European product.[22]

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates as an attachment to their prehearing or posthearing brief. None did so.

[22] ***.

U.S. supply elasticity

The domestic supply elasticity for certain preserved mushrooms measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of certain preserved mushrooms. 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 certain preserved mushrooms. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 5 to 10 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for certain preserved mushrooms measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of certain preserved mushrooms. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the certain preserved mushrooms in the production of any downstream products. Based on the available information, the aggregate demand for certain preserved mushrooms is likely to be moderately inelastic; a range of -0.5 to -1.0 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[23] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). As noted above, market participants generally reported that there is little purchaser preference for particular countries of origin or specific producers. There is general interchangeability between domestic and subject sources, frequent similarities between domestically produced certain preserved mushrooms and certain preserved mushrooms imported from subject countries, and limited significant factors other than price. Based on this available information, the elasticity of substitution between U.S.-produced certain preserved mushrooms and imported certain preserved mushrooms is likely to be in the range of 4 to 7.

[23] 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.

Part III: U.S. producer's 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 response of one firm that accounted for the vast majority of U.S. production of certain preserved mushrooms during 2021.[1]

U.S. producers

The Commission issued a U.S. producer questionnaire to five firms based on information contained in the petitions.[2] One firm, Giorgio, provided usable data on its operations. Staff believes that this response represents the vast majority of U.S. production of certain preserved mushrooms.

[1] *** Email from ***, April 14, 2022.

[2] These five firms were ***. *** certified that they have not produced certain preserved mushrooms within the specified size range since January 1, 2019.

***. Email from ***, April 27, 2022. In ***. Email from ***, November 18, 2022.

As mentioned in the previous footnote, ***.

Table III-1 presents U.S. producer Giorgio's production location(s), position on the petitions, and share of total production.

Table III-1
Certain preserved mushrooms: U.S. producer Giorgio's position on the petitions, production locations, and share of reported production, 2021

Firm	Position on petitions	Production location(s)	Share of production
Giorgio	Petitioner	Blandon, PA	100.0

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

Table III-2 presents information on U.S. producer Giorgio's ownership, related and/or affiliated firms.

Table III-2
Certain preserved mushrooms: U.S. producer Giorgio's ownership, related and/or affiliated firms

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

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

Giorgio is ***. Giorgio also *** during 2019-2021 or the interim 2022 period.

U.S. producer Giorgio was asked to report any change in the character of its operations or organization relating to the production of certain preserved mushrooms since 2019. U.S. producer Giorgio indicated in its questionnaire response that it had experienced one change, as presented in table III-3.

Table III-3
Certain preserved mushrooms: U.S. producers' reported changes in operations, since January 1, 2019

Item	Firm name and narrative response on changes in operations
Other	***

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

U.S. production, capacity, and capacity utilization

Table III-4 and figure III-1 present U.S. producer Giorgio's certain preserved mushroom production, capacity, and capacity utilization. Production increased from 2019 to 2021 by *** percent, while capacity was ***, resulting in a *** percentage point increase in capacity utilization during 2019-21. Production was *** percent lower in interim 2022 than in interim 2021, while capacity was ***, resulting in capacity utilization that was *** percentage points lower in interim 2022 than in interim 2021.

Table III-4
Certain preserved mushrooms: U.S. producer Giorgio's production, capacity, and capacity utilization, by period

Quantity in 1,000 pounds drained weight, ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
Capacity utilization	Ratio	***	***	***	***	***

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

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

Figure III-1
Certain preserved mushrooms: U.S. producer Giorgio's production, capacity, and capacity utilization, by period

* * * * * * *

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

Alternative products

Table III-5 presents U.S. producer Giorgio's capacity, production, and capacity utilization of its certain preserved mushroom production and overall production on machinery used to produce certain preserved mushrooms.

Practical overall capacity and practical certain preserved mushroom capacity were calculated based on (1) operating *** hours per week and *** weeks per year, (2) ***,[3] (3) assuming equipment that is already in place and currently operating, and (4) *** downtime for maintenance and repair. Labor was based on ***.[4] *** was identified as the first constraint to certain preserved mushroom capacity ***.

Installed overall capacity was calculated by adjusting the hours per shift used to calculate practical overall capacity from *** to *** and the number of shifts per week from *** to ***, per line. Weeks per year increased from *** to *** and downtime for maintenance and repair was removed. Giorgio reported that it would take *** to expand from practical to installed overall capacity. This would require ***. Giorgio currently sources its mushrooms from ***. To expand sourcing, Giorgio would source additional mushrooms from ***.

[3] Giorgio currently operates ***. Giorgio's U.S. producer questionnaire response, question II-3c.
[4] ***. Email from ***, October 12, 2022.

Table III-5
Certain preserved mushrooms: U.S. producer Giorgio's capacity and production on the same equipment as subject production, by period

Capacity and production in 1,000 pounds drained weight, utilization in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical certain preserved mushrooms	Capacity	***	***	***	***	***
Practical certain preserved mushrooms	Production	***	***	***	***	***
Practical certain preserved mushrooms	Utilization	***	***	***	***	***

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

As shown in table III-6, certain preserved mushrooms accounted for more than *** percent of the product produced by U.S. producer Giorgio using the same equipment and workers. Giorgio reported producing *** using the same equipment and workers used to produce certain preserved mushrooms and reported that ***. Giorgio *** report production of preserved mushrooms in containers that hold greater than 12 ounces drained weight.[5]

Table III-6
Certain preserved mushrooms: U.S. producer Giorgio's production on the same equipment as subject production, by period

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

Production Type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Certain preserved mushrooms	Quantity	***	***	***	***	***
Preserved mushrooms in large containers	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Certain preserved mushrooms	Share	***	***	***	***	***
Preserved mushrooms in large containers	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope production	Share	***	***	***	***	***
Total production	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

[5] Giorgio would need to bring in new equipment to produce the large cans of preserved mushrooms. Conference transcript, p. 50 (Rosenthal).

U.S. producer's U.S. shipments and exports

Table III-7 presents U.S. producer Giorgio's U.S. shipments, export shipments, and total shipments. Giorgio reported *** export shipments and *** U.S. shipments were ***. U.S. shipments increased in quantity by *** percent and value by *** percent from 2019 to 2020, then decreased in quantity by *** percent and value by *** percent from 2020 to 2021, for a total decrease in quantity by *** percent and an increase in value by *** percent during 2019-21. U.S. shipments were *** percent lower in quantity, but *** percent higher in value in interim 2022 than in interim 2021.

Unit values ranged from $*** to $*** per pound drained weight during 2019-21 and reached $*** per pound drained weight in January-June 2022. Unit values decreased by *** percent from 2019 to 2020, then increased by *** percent from 2020 to 2021, for an overall *** percent increase during 2019-21. Unit values were *** percent higher in interim 2022 than in interim 2021.

Table III-7
Certain preserved mushrooms: U.S. producer Giorgio's shipments, by destination and period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars; unit value in dollars per pound drained weight; shares in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. producer's inventories

Table III-8 presents U.S. producer Giorgio's end-of-period inventories and the ratio of these inventories to Giorgio's production, U.S. shipments, and total shipments**.** End-of-period inventories decreased by *** percent from 2019 to 2020, then increased by *** percent from 2020 to 2021, for a total *** percent increase during 2019-21. End-of-period inventories were *** percent higher in interim 2022 than in interim 2021. Both the inventory ratio to U.S. production and inventory ratio to U.S. shipments decreased from 2019 to 2020 by *** and *** percentage points, respectively, then increased from 2020 to 2021 by *** and *** percentage points, respectively. The inventory ratios to both U.S. production and to U.S. shipments were higher in interim 2022 than in interim 2021, by *** and *** percentage points, respectively.

Table III-8
Certain preserved mushrooms: U.S. producer Giorgio's inventories and their ratio to select items, by period

Quantity in 1,000 pounds drained weight; ratio in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
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.

U.S. producer's imports and purchases of imports from subject sources

U.S. producer Giorgio *** report purchases of imports of certain preserved mushrooms and *** import certain preserved mushrooms from January 2019 to June 2022.

U.S. employment, wages, and productivity

Table III-9 shows U.S. producer Giorgio's employment-related data. The number of production and related workers ("PRWs"), total hours worked, and hours worked per PRW all

increased during 2019-20, then decreased during 2020-21.[6] The number of PRWs and total hours worked were both lower in interim 2022 than interim 2021.

The number of production and related workers ("PRWs") increased by *** percent from 2019 to 2020, then decreased by *** percent from 2020 to 2021, for an overall increase of *** percent during 2019-21. The number of PRWs was *** percent lower in interim 2022 than in interim 2022. Total hours worked increased by *** percent from 2019 to 2020, then decreased by *** percent from 2020 to 2021, for an overall *** percent increase in total hours worked during 2019-21. Total hours worked were *** percent lower in interim 2022 than in interim 2021.

Hourly wages decreased by *** percent from 2019 to 2020, then increased by *** percent from 2020 to 2021, for an overall *** percent increase during 2019-21. Hourly wages were *** percent higher in interim 2022 than in interim 2022.

Productivity increased by *** pounds drained weight per hour during 2019-21 and was higher by *** pounds drained weight per hour in interim 2022 than in interim 2021. Unit labor costs decreased by *** percent during 2019-21 and were *** percent lower in interim 2022 than in interim 2021.

Table III-9
Certain preserved mushrooms: U.S. producer Giorgio's employment related information, by period

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
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 drained weight per hour)	***	***	***	***	***
Unit labor costs (dollars per pound drained weight)	***	***	***	***	***

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

[6] ***. Email from ***, October 12, 2022.

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

U.S. importers

The Commission issued importer questionnaires to 81 firms believed to be potential importers of certain preserved mushrooms, as well as to U.S. producer Giorgio.[1] Usable questionnaire responses were received from 17 companies,[2] [3] representing virtually all U.S.

[1] The Commission issued questionnaires to those firms identified in the petitions, 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 subheading 2003.10.01 in 2021. Three statistical reporting numbers under HTS subheading 2003.10.01 (2003.10.0127, 2003.10.0131, and 2003.10.0137) cover certain preserved mushrooms in containers holding more than 255 grams (approximately 9 ounces) drained weight. Given that all responding importers reported importing subject merchandise in containers holding no more than *** ounces, staff believes the vast majority, if not all, merchandise imported under these three statistical reporting numbers are out-of-scope.

[2] One of the seventeen importers, *** was unable to submit a questionnaire response, but ***.

[3] Of the remaining 64 firms that staff issued questionnaires to, 37 firms certified that they had not imported subject merchandise since January 1, 2019; one firm, ***, did not respond, but ***; and 26 firms did not respond. See email from ***, November 17, 2022.

imports from France,[4] *** percent of subject imports from the Netherlands,[5] virtually all U.S. imports from Poland,[6] *** percent of U.S. imports from Spain, *** percent of U.S. imports from subject sources, and *** percent of U.S. imports from nonsubject sources of certain preserved mushrooms imported from January 2019 to June 2022 under HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137. Commerce preliminarily determined a dumping margin of zero for Dutch producer/exporter Prochamp BV. As such, imports from Prochamp BV are presented as "Netherlands, nonsubject" and imports from the Netherlands that exclude Prochamp BV imports are presented as "Netherlands, subject." Import volumes, apparent consumption and market share data are presented in part IV using questionnaire data, unless otherwise indicated, and in appendix D using official import statistics (adjusted to classify imports from the Netherlands sourced from Prochamp BV as nonsubject given Commerce's preliminary dumping margin of zero).

[4] U.S. import quantities reported in Commission questionnaires accounted for *** percent of U.S. import quantities from France entered under the three primary statistical reporting numbers during January 2019 to June 2022. The difference in the import quantities reported in questionnaires and official statistics is likely due to timing differences and record keeping.

[5] Subject import quantities from the Netherlands reported in Commission questionnaires accounted for *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022 of subject import quantities from the Netherlands entered under the three primary HTS statistical reporting numbers. Around *** percent of the difference in 2021 between the two quantities is due to out-of-scope product that was imported under the primary HTS statistical reporting numbers, as reported by ***. Subject import quantities from the Netherlands reported in questionnaires accounted for *** percent of exports to the U.S. reported by Okechamp BV, the sole known subject producer/exporter in the Netherlands. Staff believe that Okechamp BV ***.

[6] U.S. import quantities reported in Commission questionnaires accounted for 102.6 percent of U.S. import quantities from Poland entered under the three primary statistical reporting numbers during January 2019 to June 2022. The difference in the import quantities reported in questionnaires and official statistics is likely due to timing differences and record keeping.

Table IV-1 lists all responding U.S. importers of certain preserved mushrooms from France, the Netherlands, Poland, Spain, and other sources, their locations, and their shares of U.S. imports, in 2021.

Table IV-1
Certain preserved mushrooms: U.S. importers, their headquarters, and share of imports within each source, 2021

Share in percent

Firm	Headquarters	France	Netherlands, subject	Poland	Spain
Acme	Seattle, WA	***	***	***	***
Allied	Glen Burnie, MD	***	***	***	***
Camerican	Paramus, NJ	***	***	***	***
DolGen	Goodlettsville, TN	***	***	***	***
Hop Chong	Manhasset, NY	***	***	***	***
JEFI	Tustin, CA	***	***	***	***
Kenover	Bayonne, NJ	***	***	***	***
Meijer	Grand Rapids, MI	***	***	***	***
MW Polar	Norwalk, CA	***	***	***	***
National Cortina	Montvale, NJ	***	***	***	***
Okechamp BV	Velden, NL	***	***	***	***
Rema	Englewood Cliffs, NJ	***	***	***	***
Roland	New York, NY	***	***	***	***
Shafer-Haggart	Vancouver, BC	***	***	***	***
Transnational	Miami, FL	***	***	***	***
Wuensche USA	Chicago, IL	***	***	***	***
Wünsche	Hamburg,	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0

Table continued.

Table IV-1 Continued
Certain preserved mushrooms: U.S. importers, their headquarters, and share of imports within each source, 2021

Share in percent

Firm	Headquarters	Subject sources	Netherlands, nonsubject	All other sources	Nonsubject sources	All import sources
Acme	Seattle, WA	***	***	***	***	***
Allied	Glen Burnie, MD	***	***	***	***	***
Camerican	Paramus, NJ	***	***	***	***	***
DolGen	Goodlettsville, TN	***	***	***	***	***
Hop Chong	Manhasset, NY	***	***	***	***	***
JEFI	Tustin, CA	***	***	***	***	***
Kenover	Bayonne, NJ	***	***	***	***	***
Meijer	Grand Rapids, MI	***	***	***	***	***
MW Polar	Norwalk, CA	***	***	***	***	***
National Cortina	Montvale, NJ	***	***	***	***	***
Okechamp BV	Velden, NL	***	***	***	***	***
Rema	Englewood Cliffs, NJ	***	***	***	***	***
Roland	New York, NY	***	***	***	***	***
Shafer-Haggart	Vancouver, BC	***	***	***	***	***
Transnational	Miami, FL	***	***	***	***	***
Wuensche USA	Chicago, IL	***	***	***	***	***
Wünsche	Hamburg,	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of certain preserved mushrooms from France, the Netherlands (broken out by subject and nonsubject sources), Poland, Spain, and all other sources. Subject imports make up the majority of total imports (over 80 percent in each period of the POI).

Subject imports increased by 7.0 percent in quantity and 19.8 percent in value during 2019-21,[7] but were 24.1 percent lower in quantity and 4.7 percent lower in value in interim 2022 than in interim 2021. U.S. imports from each of the subject sources increased during 2019-21, with the exception of U.S. imports from France.[8]

Imports from nonsubject sources, which include imports from nonsubject source Prochamp BV of the Netherlands and imports from all other nonsubject sources, [9] decreased by 7.5 percent in quantity and 2.8 percent in value between 2019 and 2020, then increased by 67.5 percent in quantity and 74.9 percent in value between 2020 and 2021, for an overall 55.0 percent increase in quantity and 70.0 percent increase in value during 2019-21. Imports from nonsubject sources were 32.8 percent lower in quantity and 14.1 percent lower in value during interim 2022 than in interim 2021.

[7] ***.

[8] ***. Email from ***, October 10, 2022. ***. Email from ***, April 26, 2022.

[9] ***. U.S. imports of certain preserved mushrooms from Chile, China, India, and Indonesia are subject to antidumping duty orders.

Average unit values of imports from subject sources increased by 11.9 percent during 2019-21 and were 25.5 percent higher in interim 2022 than in interim 2021.[10]

Subject imports from the Netherlands accounted for the largest share of total imports during the data collection period, accounting for over half of U.S. imports in all time periods during the POI, except interim 2022. Imports from France accounted for the second largest share of total imports in 2019, at *** percent, by quantity, then decreased to *** percent in 2021, making it the third largest source of subject imports by 2021. On the other hand, the share of total imports from Poland increased by 7.8 percentage points during 2019-21, making it the second largest source of subject imports, at 16.5 percent, by quantity, in 2021. As noted in footnote 8, this shift was largely due to ***.

While U.S. imports from subject sources increased during 2019-21 by 7.0 percent, U.S. production increased by a higher percentage (***) percent, resulting in a *** percentage point decrease in the ratio of U.S. imports from subject sources to U.S. production during 2019-21, from *** to ***. The ratio of U.S. imports from subject sources to U.S. production decreased further to *** by interim 2022.

[10] Several responding U.S. importers, including *** cited increased costs for certain preserved mushroom imports due to the COVID-19 pandemic. ***. Email from ***, October 10, 2022.

Table IV-2
Certain preserved mushrooms: U.S. imports by source and period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars; unit value in dollars per pound drained weight

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
France	Quantity	***	***	***	***	***
Netherlands, subject	Quantity	20,643	24,186	22,773	12,449	7,790
Poland	Quantity	3,312	3,572	7,174	3,389	3,507
Spain	Quantity	***	***	***	***	***
Subject sources	Quantity	33,223	35,266	35,550	19,288	14,639
Netherlands, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	5,172	4,785	8,017	4,369	2,934
All import sources	Quantity	38,395	40,051	43,567	23,657	17,573
France	Value	***	***	***	***	***
Netherlands, subject	Value	30,802	37,970	38,780	21,604	16,399
Poland	Value	5,080	5,654	12,011	5,620	7,236
Spain	Value	***	***	***	***	***
Subject sources	Value	51,108	55,719	61,202	33,571	31,983
Netherlands, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	9,111	8,859	15,491	8,190	7,035
All import sources	Value	60,219	64,578	76,693	41,761	39,018
France	Unit value	***	***	***	***	***
Netherlands, subject	Unit value	1.49	1.57	1.70	1.74	2.11
Poland	Unit value	1.53	1.58	1.67	1.66	2.06
Spain	Unit value	***	***	***	***	***
Subject sources	Unit value	1.54	1.58	1.72	1.74	2.18
Netherlands, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	1.76	1.85	1.93	1.87	2.40
All import sources	Unit value	1.57	1.61	1.76	1.77	2.22

Table continued on next page.

Table IV-2 Continued
Certain preserved mushrooms: Share of U.S. imports by source and period

Share and ratio in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
France	Share of quantity	***	***	***	***	***
Netherlands, subject	Share of quantity	53.8	60.4	52.3	52.6	44.3
Poland	Share of quantity	8.6	8.9	16.5	14.3	20.0
Spain	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	86.5	88.1	81.6	81.5	83.3
Netherlands, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	13.5	11.9	18.4	18.5	16.7
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
France	Share of value	***	***	***	***	***
Netherlands, subject	Share of value	51.1	58.8	50.6	51.7	42.0
Poland	Share of value	8.4	8.8	15.7	13.5	18.5
Spain	Share of value	***	***	***	***	***
Subject sources	Share of value	84.9	86.3	79.8	80.4	82.0
Netherlands, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	15.1	13.7	20.2	19.6	18.0
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
France	Ratio	***	***	***	***	***
Netherlands, subject	Ratio	***	***	***	***	***
Poland	Ratio	***	***	***	***	***
Spain	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Netherlands, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Table continued on next page.

Table IV-2 Continued
Certain preserved mushrooms: U.S. imports, by source and period

%Δ in percent

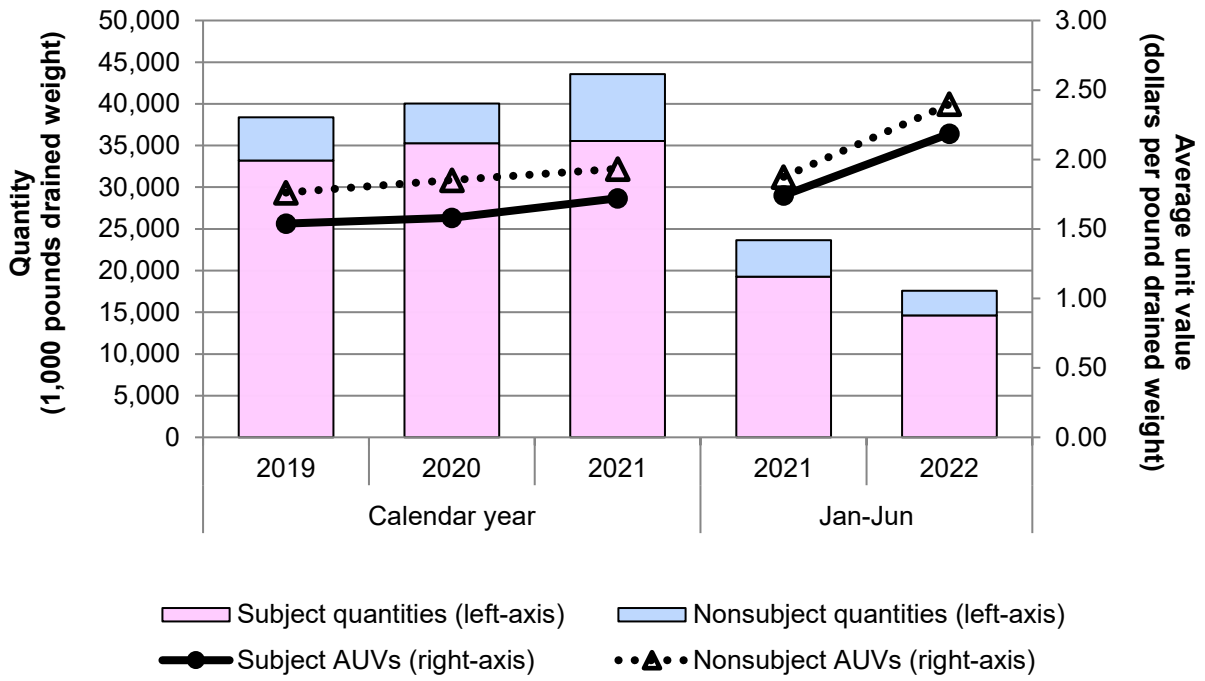
Source	Measure	2019-21	2019-20	2020-21	Q2 2021 - Q2 22
France	%Δ Quantity	▼***	▼***	▼***	▼***
Netherlands, subject	%Δ Quantity	▲10.3	▲17.2	▼(5.8)	▼(37.4)
Poland	%Δ Quantity	▲116.6	▲7.9	▲100.8	▲3.5
Spain	%Δ Quantity	▲***	▼***	▲***	▲***
Subject sources	%Δ Quantity	▲7.0	▲6.1	▲0.8	▼(24.1)
Netherlands, nonsubject	%Δ Quantity	▲***	▲***	▲***	▼***
All other sources	%Δ Quantity	▼***	▼***	▲***	▲***
Nonsubject sources	%Δ Quantity	▲55.0	▼(7.5)	▲67.5	▼(32.8)
All import sources	%Δ Quantity	▲13.5	▲4.3	▲8.8	▼(25.7)
France	%Δ Value	▼***	▼***	▼***	▼***
Netherlands, subject	%Δ Value	▲25.9	▲23.3	▲2.1	▼(24.1)
Poland	%Δ Value	▲136.4	▲11.3	▲112.4	▲28.8
Spain	%Δ Value	▲***	▼***	▲***	▲***
Subject sources	%Δ Value	▲19.8	▲9.0	▲9.8	▼(4.7)
Netherlands, nonsubject	%Δ Value	▲***	▲***	▲***	▼***
All other sources	%Δ Value	▼***	▼***	▲***	▲***
Nonsubject sources	%Δ Value	▲70.0	▼(2.8)	▲74.9	▼(14.1)
All import sources	%Δ Value	▲27.4	▲7.2	▲18.8	▼(6.6)
France	%Δ Unit value	▲***	▼***	▲***	▲***
Netherlands, subject	%Δ Unit value	▲14.1	▲5.2	▲8.5	▲21.3
Poland	%Δ Unit value	▲9.2	▲3.2	▲5.8	▲24.4
Spain	%Δ Unit value	▲***	▼***	▲***	▲***
Subject sources	%Δ Unit value	▲11.9	▲2.7	▲9.0	▲25.5
Netherlands, nonsubject	%Δ Unit value	▲***	▲***	▲***	▲***
All other sources	%Δ Unit value	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Unit value	▲9.7	▲5.1	▲4.4	▲27.9
All import sources	%Δ Unit value	▲12.2	▲2.8	▲9.2	▲25.8

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

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Figure IV-1
Certain preserved mushrooms: U.S. import quantities and average unit values, by source and period



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

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[11] 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.[12] Imports from France accounted for *** percent, subject imports from the Netherlands accounted for 60.9 percent, imports from Poland accounted for 16.6 percent, and imports from Spain accounted for *** percent of total imports of certain preserved mushrooms, by quantity, during March 2021 through February 2022.

Table IV-3
Certain preserved mushrooms: U.S. imports in the twelve-month period preceding the filing of the petitions, March 2021 through February 2022

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

Source of imports	Quantity	Share of quantity
France	***	***
Netherlands, subject	22,674	60.9
Poland	6,179	16.6
Spain	***	***
Subject sources	34,319	92.2
Netherlands, nonsubject	***	***
All other sources	***	***
Nonsubject sources	2,897	7.8
All import sources	37,216	100.0

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

[11] 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)).

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

Cumulation considerations

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

Fungibility

Table IV-4 and figure IV-2 present U.S. producer Giorgio's and U.S. importers' U.S. shipments by container type, container size, and by source, in 2021.[13] U.S. shipments of 4.0-ounce cans were reported for each source and accounted for the largest share of total U.S. shipments (*** percent), U.S. producer Giorgio's U.S. shipments (*** percent), and U.S. importers' U.S. shipments (*** percent). U.S. shipments of 8.0-ounce cans were reported for each source type except for ***, and accounted for the second largest share of total U.S. shipments (*** percent), U.S. producer Giorgio's U.S. shipments (*** percent), and U.S. importers' U.S. shipments (*** percent).

U.S. shipments of 4.5-ounce and 6.0-ounce jars were only reported for certain preserved mushrooms from ***. U.S. shipments of all other in-scope sized cans were only reported for certain preserved mushrooms ***. U.S. shipments of all other in-scope sized jars were only reported for certain preserved mushrooms from ***.[14]

[13] No U.S. shipments were classified as certain preserved mushrooms in "all other container types."

[14] ***. At the Commission's preliminary conference, the petitioner indicated that there are currently no certain preserved mushrooms being imported in cans greater than 8 ounces and less than 12 ounces. Conference transcript, pp. 34-37 (Herrmann, Louiseau).

Table IV-4
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type, 2021

Quantity in 1,000 pounds drained weight

Source	Jars, 4.5 ounces	Jars, 6.0 ounces	Jars, all other in-scope sizes	Cans, 4.0 ounces	Cans, 8.0 ounces	Cans, all other in-scope sizes	All container types
U.S. producer	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***
Netherlands, subject	***	***	***	***	***	***	21,586
Poland	***	***	***	***	***	***	5,955
Spain	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	33,078
Netherlands, nonsubject	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	6,780
All import sources	***	***	***	***	***	***	39,858
All sources	***	***	***	***	***	***	***

Table continued.

Table IV-4 Continued
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type, 2021

Share across in percent

Source	Jars, 4.5 ounces	Jars, 6.0 ounces	Jars, all other in-scope sizes	Cans, 4.0 ounces	Cans, 8.0 ounces	Cans, all other in-scope sizes	All container types
U.S. producer	***	***	***	***	***	***	100.0
France	***	***	***	***	***	***	100.0
Netherlands, subject	***	***	***	***	***	***	100.0
Poland	***	***	***	***	***	***	100.0
Spain	***	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	***	100.0
Netherlands, nonsubject	***	***	***	***	***	***	100.0
All other sources	***	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	***	100.0
All import sources	***	***	***	***	***	***	100.0
All sources	***	***	***	***	***	***	100.0

Table continued.

Table IV-4 Continued
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type, 2021

Share down in percent

Source	Jars, 4.5 ounces	Jars, 6.0 ounces	Jars, all other in-scope sizes	Cans, 4.0 ounces	Cans, 8.0 ounces	Cans, all other in-scope sizes	All container types
U.S. producer	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***
Netherlands, subject	***	***	***	***	***	***	***
Poland	***	***	***	***	***	***	***
Spain	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***
Netherlands, nonsubject	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-2
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type, 2021

* * * * * * *

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

Table IV-5 and figure IV-3 present U.S. producer Giorgio's and U.S. importers' U.S. shipments by source and container type, in 2021. U.S. shipments of cans were reported for each source and accounted for the largest share of total U.S. shipments (*** percent), U.S. producer Giorgio's U.S. shipments (*** percent), and U.S. importers' U.S. shipments (*** percent). U.S. shipments of jars were not reported for certain preserved mushrooms from ***.

Table IV-5
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type regardless of container size, 2021

Quantity in 1,000 pounds drained weight

Source	All jars	All cans	All container types
U.S. producer	***	***	***
France	***	***	***
Netherlands, subject	***	***	21,586
Poland	***	***	5,955
Spain	***	***	***
Subject sources	***	***	33,078
Netherlands, nonsubject	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	6,780
All import sources	***	***	39,858
All sources	***	***	***

Table continued.

Table IV-5 Continued
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type regardless of container size, 2021

Share across in percent

Source	All jars	All cans	All container types
U.S. producer	***	***	100.0
France	***	***	100.0
Netherlands, subject	***	***	100.0
Poland	***	***	100.0
Spain	***	***	100.0
Subject sources	***	***	100.0
Netherlands, nonsubject	***	***	100.0
All other sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table IV-5 Continued
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type regardless of container size, 2021

Share down in percent

Source	All jars	All cans	All container types
U.S. producer	***	***	***
France	***	***	***
Netherlands, subject	***	***	***
Poland	***	***	***
Spain	***	***	***
Subject sources	***	***	***
Netherlands, nonsubject	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-3
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and container type regardless of container size, 2021

* * * * * * *

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

Table IV-6 and figure IV-4 present U.S. producer Giorgio's and U.S. importers' U.S. shipments by source and certification, in 2021. With the exception of ***, U.S. shipments of kosher certain preserved mushrooms were reported from each source and accounted for *** percent of U.S. shipments from all sources. *** were the only sources of organic certain preserved mushrooms, which accounted for *** percent of total shipments.

Table IV-6
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and certification, 2021

Quantity in 1,000 pounds drained weight

Source	Organic	Kosher	Both organic and kosher	Neither organic or kosher	All organic	All kosher	All certification types
U.S. producer	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***
Netherlands, subject	***	***	***	***	***	***	21,586
Poland	***	***	***	***	***	***	5,955
Spain	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	33,078
Netherlands, nonsubject	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	6,780
All import sources	***	***	***	***	***	***	39,858
All sources	***	***	***	***	***	***	***

Table continued.

Table IV-6 Continued
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and certification, 2021

Share across in percent

Source	Organic	Kosher	Both organic and kosher	Neither organic or kosher	All organic	All kosher	All certification types
U.S. producer	***	***	***	***	***	***	100.0
France	***	***	***	***	***	***	100.0
Netherlands, subject	***	***	***	***	***	***	100.0
Poland	***	***	***	***	***	***	100.0
Spain	***	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	***	100.0
Netherlands, nonsubject	***	***	***	***	***	***	100.0
All other sources	***	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	***	100.0
All import sources	***	***	***	***	***	***	100.0
All sources	***	***	***	***	***	***	100.0

Table continued.

Table IV-6 Continued
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and certification, 2021

Share down in percent

Source	Organic	Kosher	Both organic and kosher	Neither organic or kosher	All organic	All kosher	All certification types
U.S. producer	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***
Netherlands, subject	***	***	***	***	***	***	***
Poland	***	***	***	***	***	***	***
Spain	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***
Netherlands, nonsubject	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-4
Certain preserved mushrooms: U.S. producer Giorgio's and U.S. importers' U.S. shipments, by source and certification size, 2021

* * * * * * *

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

Geographical markets

Table IV-7 presents U.S. imports of certain preserved mushrooms, by source and border of entry in 2021, based on official Commerce statistics. U.S. imports of certain preserved mushrooms from each source entered all four borders of entry in 2021. The majority of imports from subject sources entered through the Eastern and Northern borders of entry.

Table IV-7
Certain preserved mushrooms: U.S. imports by source and border of entry, 2021

Quantity in 1,000 pounds drained weight

Source	East	North	South	West	All borders
France	1,579	1,111	269	150	3,109
Netherlands	17,657	12,104	2,287	3,954	36,002
Poland	3,130	1,344	1,438	665	6,578
Spain	632	1,097	245	708	2,682
Subject sources	22,999	15,656	4,239	5,476	48,371
Nonsubject sources	824	881	23	335	2,063
All import sources	23,823	16,537	4,262	5,812	50,434

Table continued.

Table IV-7 Continued
Certain preserved mushrooms: U.S. imports by source and border of entry, 2021

Share across in percent

Source	East	North	South	West	All borders
France	50.8	35.7	8.6	4.8	100.0
Netherlands	49.0	33.6	6.4	11.0	100.0
Poland	47.6	20.4	21.9	10.1	100.0
Spain	23.6	40.9	9.1	26.4	100.0
Subject sources	47.5	32.4	8.8	11.3	100.0
Nonsubject sources	40.0	42.7	1.1	16.3	100.0
All import sources	47.2	32.8	8.5	11.5	100.0

Table continued.

Table IV-7 Continued
Certain preserved mushrooms: U.S. imports by source and border of entry, 2021

Share down in percent

Source	East	North	South	West	All borders
France	6.6	6.7	6.3	2.6	6.2
Netherlands	74.1	73.2	53.7	68.0	71.4
Poland	13.1	8.1	33.7	11.4	13.0
Spain	2.7	6.6	5.8	12.2	5.3
Subject sources	96.5	94.7	99.5	94.2	95.9
Nonsubject sources	3.5	5.3	0.5	5.8	4.1
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131 and 2003.10.0137, accessed on October 12, 2022. Imports are based on the imports for consumption data series. Staff believes that out-of-scope merchandise from the Netherlands was entered under the three primary HTS statistical reporting numbers, and thus, imports of certain preserved mushrooms from the Netherlands may be overstated.

Note: Data for Netherlands and subject sources includes merchandise imported from all Netherlands producers/exporters, including nonsubject merchandise from Prochamp, therefore, imports from subject sources may be overstated and imports from nonsubject sources may be understated.

Presence in the market

Table IV-8 and figures IV-5 and IV-6 present monthly import data by source from January 2019 to August 2022. Imports from the Netherlands, Poland, and nonsubject sources were present in the market during every month from January 2019 to August 2022. Imports from France were present in the market during every month except December 2021 and January 2022. Imports from Spain were present in the market during every month except April 2020.

Table IV-8
Certain preserved mushrooms: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds drained weight

Year	Month	France	Netherlands	Poland	Spain	Subject sources	Nonsubject sources	All import sources
2019	January	903	1,564	281	142	2,889	279	3,168
2019	February	560	1,552	208	57	2,377	208	2,586
2019	March	729	1,866	317	204	3,116	480	3,596
2019	April	960	3,322	304	243	4,829	94	4,922
2019	May	770	2,303	235	21	3,329	202	3,531
2019	June	908	2,009	293	86	3,296	109	3,405
2019	July	557	1,821	256	82	2,716	101	2,817
2019	August	399	1,863	279	69	2,610	224	2,834
2019	September	565	2,484	250	227	3,526	153	3,679
2019	October	660	1,878	304	15	2,857	41	2,898
2019	November	629	2,097	260	124	3,110	169	3,280
2019	December	481	1,452	245	209	2,387	128	2,516
2020	January	379	1,861	243	89	2,571	198	2,769
2020	February	332	1,871	168	91	2,461	129	2,591
2020	March	1,105	1,777	247	5	3,134	148	3,282
2020	April	604	2,223	224	---	3,051	138	3,189
2020	May	745	2,729	219	143	3,835	218	4,053
2020	June	318	2,919	190	173	3,599	179	3,778
2020	July	463	2,502	358	40	3,362	224	3,586
2020	August	537	2,367	374	140	3,418	103	3,521
2020	September	531	2,710	307	85	3,634	153	3,786
2020	October	497	2,870	219	20	3,606	127	3,734
2020	November	289	2,587	199	117	3,191	176	3,367
2020	December	286	2,680	558	433	3,957	238	4,195

Table continued.

Table IV-8 Continued
Certain preserved mushrooms: Quantity of U.S. imports, by source and month

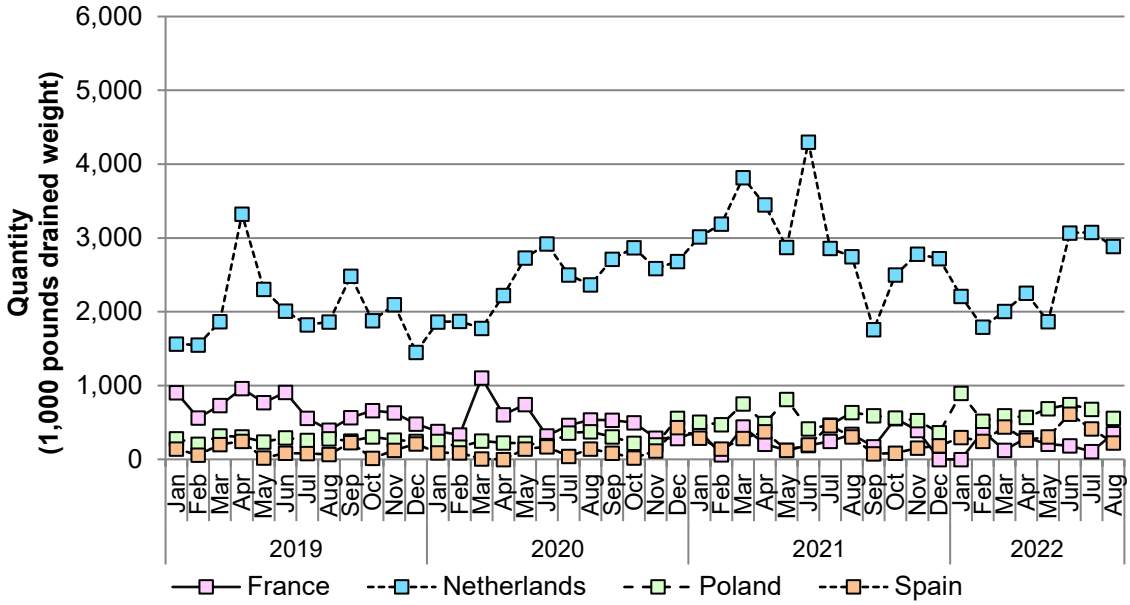
Quantity in 1,000 pounds drained weight

Year	Month	France	Netherlands	Poland	Spain	Subject sources	Nonsubject sources	All import sources
2021	January	390	3,014	503	290	4,197	211	4,408
2021	February	62	3,190	469	141	3,862	68	3,930
2021	March	438	3,817	753	286	5,293	220	5,513
2021	April	206	3,448	489	377	4,519	195	4,715
2021	May	125	2,873	813	124	3,935	137	4,072
2021	June	189	4,300	414	198	5,102	215	5,317
2021	July	244	2,859	465	457	4,024	237	4,261
2021	August	339	2,745	634	306	4,024	184	4,208
2021	September	171	1,756	590	77	2,595	138	2,733
2021	October	551	2,501	560	86	3,698	183	3,881
2021	November	393	2,780	525	156	3,854	152	4,006
2021	December	---	2,719	363	184	3,267	123	3,390
2022	January	---	2,208	894	297	3,399	215	3,614
2022	February	380	1,793	520	246	2,939	259	3,198
2022	March	126	2,004	592	442	3,164	205	3,369
2022	April	294	2,254	570	262	3,380	231	3,611
2022	May	206	1,869	687	306	3,067	179	3,246
2022	June	184	3,069	745	613	4,611	294	4,906
2022	July	106	3,077	678	412	4,272	192	4,464
2022	August	349	2,884	556	222	4,011	285	4,297

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131 and 2003.10.0137, accessed on October 12, 2022. Imports are based on the imports for consumption data series. Staff believes that out-of-scope merchandise from the Netherlands was entered under the three primary HTS statistical reporting numbers, and thus, imports of certain preserved mushrooms from the Netherlands may be overstated.

Note: Data for Netherlands and subject sources includes merchandise imported from all Netherlands producers/exporters, including nonsubject merchandise from Prochamp, therefore, imports from subject sources may be overstated and imports from nonsubject imports may be understated. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

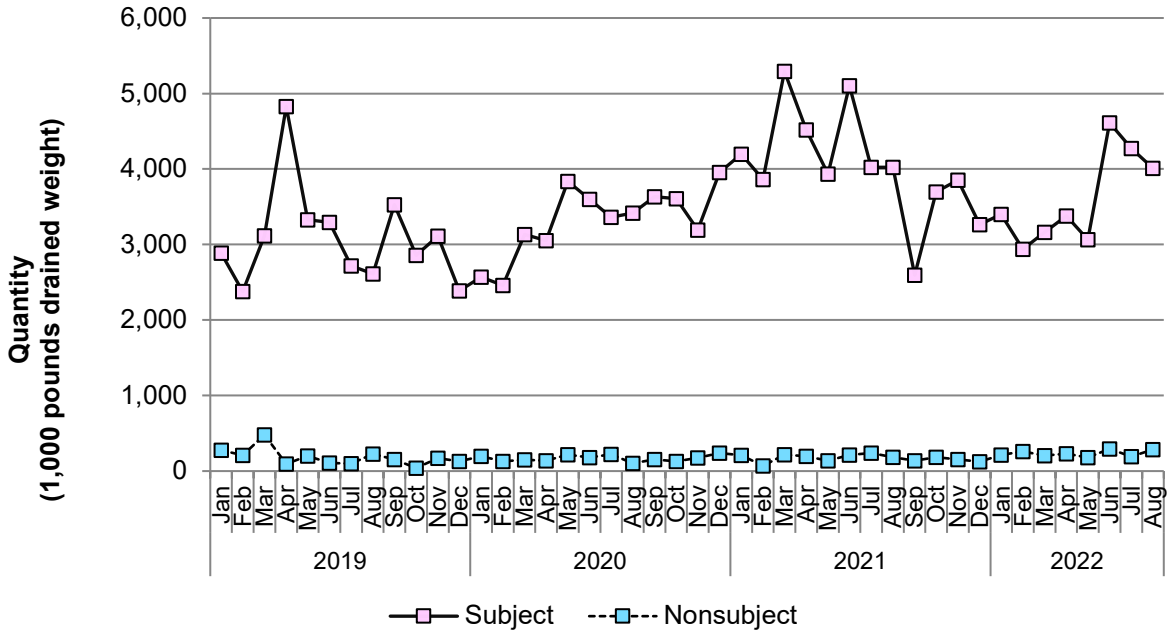
Figure IV-5
Certain preserved mushrooms: U.S. imports from individual subject sources, by source and by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131 and 2003.10.0137, accessed on October 12, 2022. Imports are based on the imports for consumption data series. Staff believes that out-of-scope merchandise from the Netherlands was entered under the three primary HTS statistical reporting numbers, and thus, imports of certain preserved mushrooms from the Netherlands may be overstated.

Note: Data for Netherlands includes merchandise imported from all Netherlands producers/exporters, including nonsubject merchandise from Prochamp.

Figure IV-6
Certain preserved mushrooms: U.S. imports from aggregated subject and nonsubject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131 and 2003.10.0137, accessed on October 12, 2022. Imports are based on the imports for consumption data series. Staff believes that out-of-scope merchandise from the Netherlands was entered under the three primary HTS statistical reporting numbers, and thus, imports of certain preserved mushrooms from the Netherlands may be overstated.

Note: Data for subject sources includes merchandise imported from all Netherlands producers/exporters, including nonsubject merchandise from Prochamp, therefore, imports from subject sources may be overstated and imports from nonsubject sources may be understated.

Apparent U.S. consumption and market shares

Quantity

Table IV-9 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares by quantity for certain preserved mushrooms. Apparent U.S. consumption increased by *** percent from 2019 to 2020, then decreased by *** percent from 2020 to 2021, for an overall *** percent increase in quantity, during 2019-21. Apparent U.S. consumption by quantity was *** percent lower in interim 2022 than in interim 2021.

The U.S. producer's share of apparent U.S. consumption decreased by *** percentage points in quantity and subject imports' share decreased by *** percentage points during 2019-21, while nonsubject imports' share increased by *** percentage points. The U.S. producer's and nonsubject imports' shares were higher in interim 2022 than in interim 2021, by *** and *** percentage points, respectively, while subject imports' share was *** percentage points lower in interim 2022 than in interim 2021.

Table IV-9
Certain preserved mushrooms: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 pounds drained weight; shares in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Quantity	***	***	***	***	***
France	Quantity	***	***	***	***	***
Netherlands, subject	Quantity	19,480	25,173	21,586	11,941	8,308
Poland	Quantity	3,306	3,613	5,955	3,099	2,698
Spain	Quantity	***	***	***	***	***
Subject sources	Quantity	32,487	38,023	33,078	18,165	13,361
Netherlands, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	4,535	4,796	6,780	3,665	4,108
All import sources	Quantity	37,022	42,819	39,858	21,830	17,469
All sources	Quantity	***	***	***	***	***
U.S. producer	Share	***	***	***	***	***
France	Share	***	***	***	***	***
Netherlands, subject	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Spain	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Netherlands, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Figure IV-7
Certain preserved mushrooms: Apparent U.S. consumption based on quantity data, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Value

Table IV-10 and figure IV-8 present data on apparent U.S. consumption and U.S. market shares by value for certain preserved mushrooms. Apparent U.S. consumption increased by *** percent in value during 2019-21, but was *** percent lower in interim 2022 than in interim 2021.

The U.S. producer's share of apparent U.S. consumption decreased by *** percentage points in value and subject imports' share decreased by *** percentage points during 2019-21, while nonsubject imports' share increased by *** percentage points. The U.S. producer's and nonsubject imports' shares were higher in interim 2022 than in interim 2021, by *** and *** percentage points, respectively, while subject imports' share was *** percentage points lower in interim 2022 than in interim 2021.

Table IV-10
Certain preserved mushrooms: Apparent U.S. consumption and market shares based on value data, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Value	***	***	***	***	***
France	Value	***	***	***	***	***
Netherlands, subject	Value	33,861	44,441	41,325	22,936	18,901
Poland	Value	5,259	6,421	11,320	5,714	5,896
Spain	Value	***	***	***	***	***
Subject sources	Value	57,639	68,512	64,887	35,210	30,186
Netherlands, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	9,086	10,927	14,528	7,866	10,261
All import sources	Value	66,725	79,439	79,415	43,076	40,447
All sources	Value	***	***	***	***	***
U.S. producer	Share	***	***	***	***	***
France	Share	***	***	***	***	***
Netherlands, subject	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Spain	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Netherlands, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	***	***	***	***	***

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

Figure IV-8
Certain preserved mushrooms: Apparent U.S. consumption based on value, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Apparent U.S. consumption and market shares for branded product

Table IV-11 and figure IV-9 present apparent U.S. consumption and U.S. market shares by quantity for branded certain preserved mushrooms.

Table IV-11
Certain preserved mushrooms: Market for branded product, by source and period

Quantity in 1,000 pounds drained weight; share in percent; ratios in percent and are to overall apparent consumption quantity

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Quantity	***	***	***	***	***
France	Quantity	***	***	***	***	***
Netherlands, subject	Quantity	***	***	***	***	***
Poland	Quantity	***	***	***	***	***
Spain	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Netherlands, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producer	Share	***	***	***	***	***
France	Share	***	***	***	***	***
Netherlands, subject	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Spain	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Netherlands, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producer	Ratio	***	***	***	***	***
France	Ratio	***	***	***	***	***
Netherlands, subject	Ratio	***	***	***	***	***
Poland	Ratio	***	***	***	***	***
Spain	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Netherlands, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	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 “---“.

Figure IV-9
Certain preserved mushrooms: Market for branded product, by source and period

* * * * * * *

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

Table IV-12 and figure IV-10 present values and average unit values, by source, for branded certain preserved mushrooms.

Table IV-12
Certain preserved mushrooms: Values and average unit values for branded product, by source and period

Value in 1,000 dollars; unit values in dollars per pound drained weight

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Value	***	***	***	***	***
France	Value	***	***	***	***	***
Netherlands, subject	Value	***	***	***	***	***
Poland	Value	***	***	***	***	***
Spain	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Netherlands, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producer	Unit value	***	***	***	***	***
France	Unit value	***	***	***	***	***
Netherlands, subject	Unit value	***	***	***	***	***
Poland	Unit value	***	***	***	***	***
Spain	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Netherlands, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
All sources	Unit value	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Figure IV-10
Certain preserved mushrooms: Average unit values for branded product, by source and period

* * * * * * *

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

Apparent U.S. consumption and market shares for private label product

Table IV-13 and figure IV-11 present apparent U.S. consumption and U.S. market shares by quantity for private label certain preserved mushrooms.

Table IV-13
Certain preserved mushrooms: Market for private label product, by source and period

Quantity in 1,000 pounds drained weight; share in percent; ratios in percent and are to overall apparent consumption quantity

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Quantity	***	***	***	***	***
France	Quantity	***	***	***	***	***
Netherlands, subject	Quantity	***	***	***	***	***
Poland	Quantity	***	***	***	***	***
Spain	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Netherlands, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producer	Share	***	***	***	***	***
France	Share	***	***	***	***	***
Netherlands, subject	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Spain	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Netherlands, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producer	Ratio	***	***	***	***	***
France	Ratio	***	***	***	***	***
Netherlands, subject	Ratio	***	***	***	***	***
Poland	Ratio	***	***	***	***	***
Spain	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Netherlands, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	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.

Figure IV-11
Certain preserved mushrooms: Market for private label product, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Table IV-14 and figure IV-12 present values and average unit values, by source, for private label certain preserved mushrooms.

Table IV-14
Certain preserved mushrooms: Values and average unit values for private label product, by source and period

Value in 1,000 dollars; unit values in dollars per pound drained weight

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Value	***	***	***	***	***
France	Value	***	***	***	***	***
Netherlands, subject	Value	***	***	***	***	***
Poland	Value	***	***	***	***	***
Spain	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Netherlands, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producer	Unit value	***	***	***	***	***
France	Unit value	***	***	***	***	***
Netherlands, subject	Unit value	***	***	***	***	***
Poland	Unit value	***	***	***	***	***
Spain	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Netherlands, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
All sources	Unit value	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires

Figure IV-12
Certain preserved mushrooms: Average unit values for private label product, by source and period

* * * * * * *

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

Part V: Pricing data

Factors affecting prices

Raw material costs

Certain preserved mushrooms are made primarily from mushrooms from the genus *Agaricus*, which are then preserved and packed.[1] Mushrooms make up most of the raw material cost for certain preserved mushrooms. Raw materials as a share of costs of goods sold rose from *** percent in 2019 to *** percent in 2021, and were *** percent in the first half of 2022, down from *** percent in the first half of 2021.

The sole responding U.S. producer indicated that raw material costs had *** since January 1, 2019. It elaborated that fresh mushroom prices had been relatively stable, but that the cost of steel cans and glass jars had risen substantially. Almost all responding importers (14 of 16)[2] reported that raw material costs had increased since January 1, 2019, with one reporting that raw material prices fluctuated and one reporting that they had not changed. Some importers reporting rising raw material costs described increased costs of not only raw materials but also energy, shipping, and labor. Four importers described increasing their prices of certain preserved mushrooms as a result, and one described losing sales as a result of not having competitive prices. *** described raw material costs as increasing continuously each year since 2019.

As shown in figure V-1, prices of *Agaricus* mushrooms have increased overall since January 2019. Prices of *Agaricus* mushrooms increased from the 2018-19 season to the 2019-20 season and slightly declined in the 2020-21 season, and then increased again in the 2021-22 season. Overall, the average price of *Agaricus* mushrooms increased by 8.2 percent from the 2018-19 season to the 2021-22 season (table V-1).

Among purchasers, six indicated that they were not familiar with the costs of raw materials used in producing preserved mushrooms. Three (***) indicated that they were. *** indicated that information on raw material costs had affected *** negotiations or contracts to purchase certain preserved mushrooms since 2019. *** stated that rising raw material and energy costs, along with supply chain issues, had led to price increases. *** indicated that raw material costs, as a contributor to total

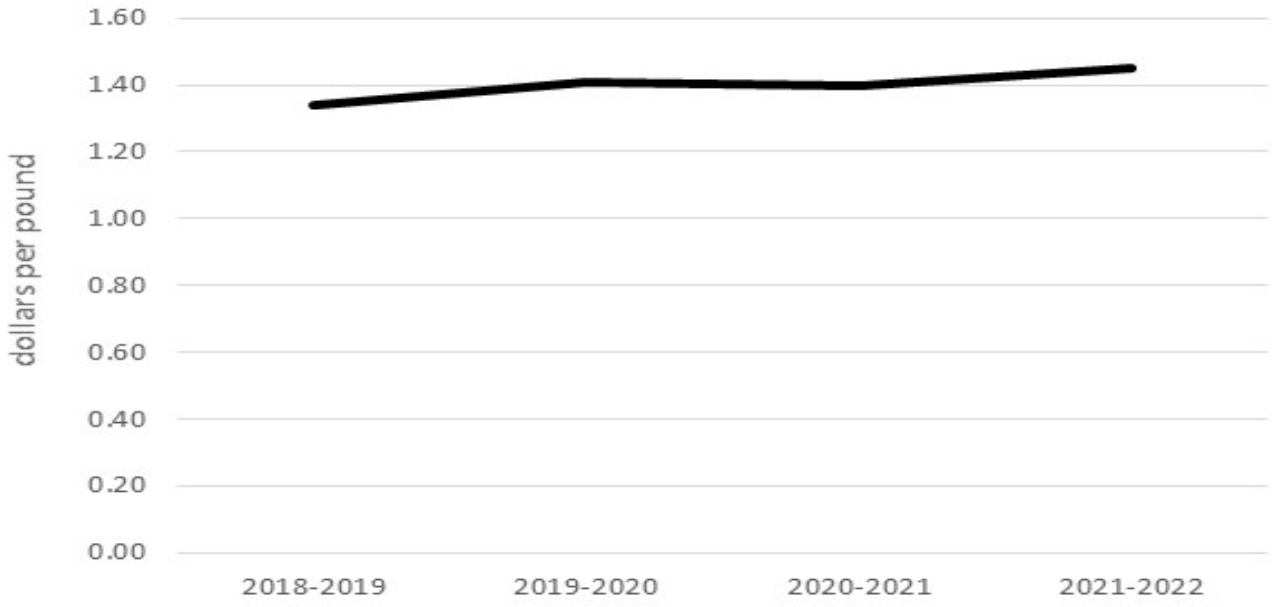
[1] Petition, Volume 1 p. 5

[2] An additional importer, ***, did not answer questions in this section of its questionnaire.

product cost, is one of many factors examined when making purchasing decisions for preserved mushrooms. *** indicated that information on raw material costs had not affected *** purchasing decisions since 2019.

Figure V-1
Agaricus and specialty mushrooms: U.S. average price per pound per year, January 2019–August 2022

Price per pound on an annual basis



Source: USDA "Mushrooms," 2021 and 2022, accessed October 6, 2022.[3]

Table V-1
Agaricus and specialty mushrooms: U.S. average price per pound per year, January 2019–August 2022

Prices in dollars per pound

Year	U.S. average price per pound
2018-2019 season	1.34
2019-2020 season	1.41
2020-2021 season	1.40
2021-2022 season	1.45

Source: USDA 2021 Summary and 2022 Summary, published August 2022

[3] USDA "Mushrooms" 2021 and 2022, https://usda.library.cornell.edu/concern/publications/r781wg03d Accessed October 6, 2022.

Transportation costs to the U.S. market

Transportation costs for certain preserved mushrooms from subject countries to the United States (excluding U.S. inland transportation costs) in 2021 were estimated to be equivalent to approximately 10.1 percent of the customs value for product from France, 14.8 percent of the customs value for product from the Netherlands, 11.9 percent of the customs value for product from Poland, and 11.1 percent of the customs value for product from Spain. These estimates were derived from official import data and represent the transportation and other charges on imports.[4]

U.S. inland transportation costs

The sole responding U.S. producer and seven importers reported that ***, while seven importers reported that their purchasers typically ***.[5] The U.S. producer reported that its U.S. inland transportation costs were *** percent while most responding importers reported costs of 2.0 to 13.0 percent. Three importers reported costs of 20.0 to 25.0 percent.

Exchange rates

The Euro appreciated 7 percent from January 2019 to January 2021. From January 2021 to September 2022, it then depreciated 23 percent, for an overall depreciation of 15 percent between January 2019 and September 2022.[6]

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices predominantly by *** (table V-2). Importer ***

[4] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2021 and then dividing by the customs value based on the HTS statistical reporting number 2003.10.0127, 2003.10.0131, and 2003.10.0137.

[5] Ten importers reported that they generally ship certain preserved mushrooms to customers from a storage facility, while four indicated that they did so from their point of importation.

[6] Federal Reserve Bank of St. Louis, economic data, accessed October 21, 2022.

***. Importer *** stated that it used *** price lists.

Table V-2
Certain preserved mushrooms: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Importers
Transaction-by-transaction	***	6
Contract	***	13
Set price list	***	4
Other	***	1
Responding firms	1	14

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.

All eight responding purchasers indicated that their purchases of certain preserved mushrooms involved negotiations with their suppliers. These purchasers described negotiating over factors including price, quality, quantity, availability, lead times, payment terms, delivery, location of supplier warehouse, and/or customer service. *** indicated that it ***. *** stated that it ***. *** indicated that it does not quote prices from competitors to suppliers.

Parties disagreed over whether prices for branded and private label product were the same. Giorgio described the retail price of private label product as lower than that of branded but stated that the difference was because retailers accepted a lower profit margin on their own brand (private label) than on other brands. Nonetheless, Giorgio stated that its wholesale certain preserved mushroom prices reflected the volume of sales to a particular customer more than whether product was branded or private label.[7] However, purchaser Purcell described Giorgio as reluctant to supply the private label market due to the lower retail prices of private label product and, along with importer Wuensche USA, described wholesale prices of branded product as higher than private label product.[8]

[7] Hearing transcript, pp. 68-69 (Loiseau), as well as comments of purchaser Purcell, hearing transcript, pp. 155-57 (Purcell).

[8] Hearing transcript, pp. 142-43 (Purcell) and p. 198 (Purcell and Gaterman). See also prehearing brief of Polish, Dutch, and Spanish producers, p. 5.

The U.S. producer reported selling most of its certain preserved mushrooms ***. Importers reported selling the majority of their certain preserved mushrooms ***, although they had other types of sales as well (table V-3).

Table V-3
Certain preserved mushrooms: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2021

Share in percent

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

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

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

The U.S. producer's ***. Some importers' ***.

One purchaser (***) reported that it purchases product daily, three (***) purchase weekly, one (***) purchases monthly, one (***) purchases quarterly, and two (***) purchase annually. (***.) Seven of nine responding purchasers reported that their purchasing frequency had not changed since January 1, 2019. ***, *** indicated that it began placing additional orders in 2020 to ensure it received adequate supplies.

Most purchasers contact two to five suppliers before making a purchase, although two purchasers (***) may contact only one.

Sales terms and discounts

The U.S. producer indicated that ***. Nine importers typically quote prices on an f.o.b. basis from their warehouses, points of importation, and/or foreign ports. Seven importers priced on a delivered basis. (One importer, ***, priced in both ways.)

The U.S. producer stated that it offers ***. Fourteen importers indicated that they had no discount policy, ***. Additionally, importer *** stated that it offers ***.

Price leadership

*** reported that Giorgio was a price leader in the preserved mushrooms market, describing Giorgio as an industry leader through its brands. No other purchasers reported any price leaders.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following certain preserved mushrooms products shipped to unrelated U.S. customers during January 2019-June 2022.

Product 1.-- Stems and pieces, in 4 ounce cans (excluding organic mushrooms)

Product 2.-- Stems and pieces, in 8 ounce cans (excluding organic mushrooms)

Product 3.-- Whole sliced mushrooms, in 4 ounce cans (excluding organic mushrooms)

Product 4.-- Sliced mushrooms, in 4.5 ounce jars (excluding organic mushrooms)

One U.S. producer and 11 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[9] Pricing data reported by these firms accounted for approximately *** percent of the U.S. producer's U.S. shipments of certain preserved mushrooms, *** percent of U.S. shipments of subject imports from France, *** percent from the Netherlands, *** percent from Poland, and *** percent from Spain in 2021.[10]

Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-2 to V-5. On November 3, 2022, the Department of Commerce preliminarily determined that imports of certain preserved mushrooms from Dutch producer Prochamp have an estimated dumping margin of 0.0 percent. (See Part I.) Pricing data for products from Dutch producer Prochamp are not included in Part V, but can be found in Appendix E.

[9] 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.

Importer ***.

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

Table V-4
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	U.S. price	U.S. quantity	France price	France quantity	France margin
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***

Period	Netherlands price	Netherlands quantity	Netherlands margin	Poland price	Poland quantity	Poland margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

Table continued.

Table V-4 Continued.
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	Spain price	Spain quantity	Spain margin	Subject price	Subject quantity	Subject margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Quantities shown as “0” represent quantities greater than zero but less than 500 pounds.

Note: Product 1: Stems and pieces, in 4 ounce cans (excluding organic mushrooms).

Figure V-2
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Stems and pieces, in 4 ounce cans (excluding organic mushrooms).

Table V-5
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	U.S. price	U.S. quantity	France price	France quantity	France margin
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***

Period	Netherlands price	Netherlands quantity	Netherlands margin	Poland price	Poland quantity	Poland margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

Table continued.

Table V-5 Continued.
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	Spain price	Spain quantity	Spain margin	Subject price	Subject quantity	Subject margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Quantities shown as “0” represent quantities greater than zero but less than 500 pounds.

Note: Product 2: Stems and pieces, in 8 ounce cans (excluding organic mushrooms).

Figure V-3
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Stems and pieces, in 8 ounce cans (excluding organic mushrooms).

Table V-6
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	U.S. price	U.S. quantity	France price	France quantity	France margin
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***

Period	Netherlands price	Netherlands quantity	Netherlands margin	Poland price	Poland quantity	Poland margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

Table continued.

Table V-6 Continued.
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	Spain price	Spain quantity	Spain margin	Subject price	Subject quantity	Subject margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Quantities shown as “0” represent quantities greater than zero but less than 500 pounds.

Note: Product 3: Whole sliced mushrooms, in 4 ounce cans (excluding organic mushrooms).

Figure V-4
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Whole sliced mushrooms, in 4 ounce cans (excluding organic mushrooms).

Table V-7
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	U.S. price	U.S. quantity	France price	France quantity	France margin
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***

Period	Netherlands price	Netherlands quantity	Netherlands margin	Poland price	Poland quantity	Poland margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

Table continued.

Table V-7 Continued.
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight; Margins in percent

Period	Spain price	Spain quantity	Spain margin	Subject price	Subject quantity	Subject margin
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Quantities shown as “0” represent quantities greater than zero but less than 500 pounds.

Note: Product 4: Sliced mushrooms, in 4.5 ounce jars (excluding organic mushrooms).

Figure V-5
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Sliced mushrooms, in 4.5 ounce jars (excluding organic mushrooms).

Price trends

In general, prices increased during January 2019-June 2022, except for ***. Table V-8 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent during January 2019-June 2022 while import price increases ranged from *** to *** percent for product from France, *** to *** for subject product from the Netherlands, *** to *** for product from Poland, and *** to *** for product from Spain.

Table V-8
Certain preserved mushrooms: Summary of price data, by product and source, January 2019-June 2022

Prices in dollars per pound drained weight; Quantity in 1,000 pounds drained weight; Change in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	France	***	***	***	***	***	***	***
Product 1	Netherlands, subject	***	***	***	***	***	***	***
Product 1	Poland	***	***	***	***	***	***	***
Product 1	Spain	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	France	***	***	***	***	***	***	***
Product 2	Netherlands, subject	***	***	***	***	***	***	***
Product 2	Poland	***	***	***	***	***	***	***
Product 2	Spain	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	France	***	***	***	***	***	***	***
Product 3	Netherlands, subject	***	***	***	***	***	***	***
Product 3	Poland	***	***	***	***	***	***	***
Product 3	Spain	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	France	***	***	***	***	***	***	***
Product 4	Netherlands, subject	***	***	***	***	***	***	***
Product 4	Poland	***	***	***	***	***	***	***
Product 4	Spain	***	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2019 to the second quarter in 2022.

Price comparisons

As shown in tables V-9 and V-10, prices for products imported from subject countries were below those for U.S.-produced product in 125 of 209 instances (53.8 million pounds); margins of underselling ranged from 0.0 to 64.0 percent. In the remaining 84 instances (11.9 million pounds), prices for product from subject countries were between 0.4 and 51.5 percent above prices for the domestic product.

Prices for certain preserved mushrooms imported from France were below those of U.S. produced product in *** of *** instances; margins of underselling ranged from *** to *** percent. In the remaining *** instances, prices for certain preserved mushrooms from France were between *** to *** percent above prices for the domestic product.

For certain preserved mushrooms imported from the Netherlands, prices were below those of U.S. produced product in *** of *** instances; margins of underselling ranged from *** to *** percent. In the remaining *** instances, prices for certain preserved mushrooms from the Netherlands were between *** to *** percent higher than above prices for domestic product.

Prices for certain preserved mushrooms imported from Poland were below those of U.S. produced product in *** of *** instances; margins of underselling ranged from *** to *** percent. In the remaining *** instances, prices for certain preserved mushrooms from Poland were between *** to *** percent above prices for the domestic product.

Imports of certain preserved mushrooms from Spain were priced below U.S. produced product in *** of *** instances, with margins of underselling ranging from *** to *** percent. In the remaining *** instances, prices were between *** to *** percent above prices for the domestic product.

Table V-9
Certain preserved mushrooms: Instances of underselling and overselling and the range and average of margins, by product

Quantity in 1,000 pounds drained weight; Margins in percent

Products	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
All products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
All products	Overselling	***	***	***	***	***

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. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-10
Certain preserved mushrooms: Instances of underselling and overselling and the range and average of margins, by source

Quantity in 1,000 pounds drained weight; Margins in percent

Sources	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
France	Underselling	***	***	***	***	***
Netherlands	Underselling	***	***	***	***	***
Poland	Underselling	***	***	***	***	***
Spain	Underselling	***	***	***	***	***
All subject sources	Underselling	***	***	***	***	***
France	Overselling	***	***	***	***	***
Netherlands	Overselling	***	***	***	***	***
Poland	Overselling	***	***	***	***	***
Spain	Overselling	***	***	***	***	***
All subject sources	Overselling	***	***	***	***	***

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. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". These data include only quarters in which there is a comparison between the U.S. and subject product.

Other price information

In its posthearing brief, H-E-B provided price lists from Giorgio that it described as showing that Giorgio's prices increased by ***. H-E-B continued that, after Giorgio filed the petition for antidumping investigations on March 31, 2022, it announced two more price increases of ***. H-E-B also described prices of product from *** as increasing ***.[11]

In its posthearing brief, Giorgio stated that it ***. It also stated that in ***.[12]

Lost sales and lost revenue

In the preliminary phase of the investigations, the Commission requested that U.S. producers of certain preserved mushrooms report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of certain preserved mushrooms from France, the Netherlands, Poland, and/or Spain during January 2019-December 2021.

U.S. producer ***. It identified ***.

In the final phase of the investigations, the U.S. producer reported that ***.

[11] H-E-B's posthearing brief, p. 4 and attachment 4.

[12] Petitioner's posthearing brief, exhibit 4, pp. 3-4.

Staff contacted 45 purchasers and received responses from 9 purchasers.[13] Responding purchasers reported purchasing *** million pounds drained weight of certain preserved mushrooms during January 2019-June 2022 (table V-11).[14]

Of the 8 responding purchasers, 7 reported that, since 2019, they had purchased imported certain preserved mushrooms from France, the Netherlands, Poland, and/or Spain instead of U.S.-produced product (table V-12). Four of these purchasers reported that subject import prices were lower than U.S.-produced product, while two stated that they were not. Purchasers listed availability and supplier approval were other reasons listed for purchasing subject imports rather than U.S. product.

As shown in table V-13, two purchasers (***) reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product, estimating the quantity of certain preserved mushrooms from France, the Netherlands, Poland, and/or Spain purchased instead of domestic product to be *** million pounds. Most of this quantity was reported by ***.

Four purchasers indicated that U.S. producers had not reduced prices in order to compete with lower-priced imports from subject countries. (The others did not know or did not respond.)

[13] Purchaser *** submitted a lost sales lost revenue survey response in the preliminary phase, but did not submit a purchaser questionnaire response in the final phase.

[14] ***.

Table V-11
Certain preserved mushrooms: Purchasers' reported purchases and imports, by firm and source

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

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

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

Table V-12
Certain preserved mushrooms: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds drained weight

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

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

Table V-13
Certain preserved mushrooms: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in 1,000 pounds drained weight

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
France	2	---	---	***
Netherlands	6	3	1	***
Poland	3	1	1	***
Spain	1	---	---	***
Any subject source	7	4	2	***

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

Part VI: Financial experience of the U.S. producer

Background[1]

One U.S. producer, Giorgio, reported financial results and related information on its U.S. certain preserved mushrooms operations.[2] [3] As noted previously in this report, the certain preserved mushrooms operations of two other U.S. producers (Monterey and Sunny Dell) were either closed entirely (Monterey in 2019) or substantially reduced during the period (Sunny Dell).[4] *** company submitted a complete U.S. producer questionnaire for the final phase of these investigations.

Giorgio's operations on certain preserved mushrooms are vertically integrated with respect to the majority of its fresh mushroom input, as well as containers (metal and glass).[5] [6] Giorgio reported what appear to be modest changes in its operations related to ***.[7] The impact of COVID-19 on Giorgio's financial results is discussed in the *Cost of goods sold and gross profit or loss* section below.

[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] As described by a Giorgio company official, "Giorgio is a third-generation family-owned company that was founded in 1928." Conference transcript, p. 9 (Loiseau).

[3] Giorgio's financial results are based on information from an accounting system designed to generate/report overall financial results on a U.S. GAAP basis. Its annual financial results on certain preserved mushrooms were reported for calendar-year periods. Staff conducted a verification of Giorgio's financial results and related information on October 18-19, 2022. ***. Verification report, p. 3.

[4] Conference transcript, p. 5 (Herrmann) and pp. 12-13 (Loiseau).

[5] Conference transcript, pp. 25-26, p. 73 (Loiseau). Giorgio also purchases fresh mushrooms and packaging from unrelated suppliers. Conference transcript, p. 86 (Loiseau).

[6] ***. Verification report, pp. 3-4. Vertical integration with respect to these inputs did not change during the period. Conference transcript, p. 86 (Loiseau).

[7] Giorgio U.S. producer questionnaire, responses to II-2a and II-6.

Operations on Certain Preserved Mushrooms

Table VI-1 presents income-and-loss data for Giorgio's operations on certain preserved mushrooms and table VI-2 presents corresponding AUV (dollars per pound drained weight) percentage and unit changes.[8]

Table VI-1
Certain preserved mushrooms: Results of operations of U.S. producer Giorgio, by item and period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars; ratios in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Fresh mushrooms from unrelated suppliers	Value	***	***	***	***	***
COGS: Fresh mushrooms from related suppliers	Value	***	***	***	***	***
COGS: Other raw materials	Value	***	***	***	***	***
COGS: Total raw materials	Value	***	***	***	***	***
COGS: Container costs	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Estimated cash flow from operations	Value	***	***	***	***	***
COGS: Fresh mushrooms from unrelated suppliers	Ratio to NS	***	***	***	***	***
COGS: Fresh mushrooms from related suppliers	Ratio to NS	***	***	***	***	***
COGS: Other raw materials	Ratio to NS	***	***	***	***	***
COGS: Total raw materials	Ratio to NS	***	***	***	***	***

Table continued.

[8] As noted in the *Net sales* section below, Giorgio's certain preserved mushrooms product mix changed somewhat during the period. Since the Commission's variance analysis is generally more meaningful when product mix remains the same throughout the period, a variance analysis is not presented here.

Table VI-1 Continued
Certain preserved mushrooms: Results of operations of U.S. producer Giorgio, by item and period

Ratios in percent; shares in percent; unit values in dollars per pound drained weight; count in number of firms reporting

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
COGS: Container costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit or (loss)	Ratio to NS	***	***	***	***	***
SG&A expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
COGS: Fresh mushrooms from unrelated suppliers	Share	***	***	***	***	***
COGS: Fresh mushrooms from related suppliers	Share	***	***	***	***	***
COGS: Other raw materials	Share	***	***	***	***	***
COGS: Total raw materials	Share	***	***	***	***	***
COGS: Container costs	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory costs	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Fresh mushrooms from unrelated suppliers	Unit value	***	***	***	***	***
COGS: Fresh mushrooms from related suppliers	Unit value	***	***	***	***	***
COGS: Other raw materials	Unit value	***	***	***	***	***
COGS: Total raw materials	Unit value	***	***	***	***	***
COGS: Container costs	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of total COGS.

Table VI-2
Certain preserved mushrooms: Changes in U.S. producer Giorgio's AUVs between comparison periods

Changes in percent

Item	2019-21	2019-20	2020-21	Jan-Jun 2021-22
Total net sales	***	***	***	***
COGS: Fresh mushrooms from unrelated suppliers	***	***	***	***
COGS: Fresh mushrooms from related suppliers	***	***	***	***
COGS: Other raw materials	***	***	***	***
COGS: Total raw materials	***	***	***	***
COGS: Container costs	***	***	***	***
COGS: Direct labor	***	***	***	***
COGS: Other factory costs	***	***	***	***
COGS: Total	***	***	***	***

Table continued.

Table VI-2 Continued
Certain preserved mushrooms: Changes in U.S. producer Giorgio's AUVs between comparison periods

Changes in dollars per pound drained weight

Item	2019-21	2019-20	2020-21	Jan-Jun 2021-22
Total net sales	***	***	***	***
COGS: Fresh mushrooms from unrelated suppliers	***	***	***	***
COGS: Fresh mushrooms from related suppliers	***	***	***	***
COGS: Other raw materials	***	***	***	***
COGS: Total raw materials	***	***	***	***
COGS: Container costs	***	***	***	***
COGS: Direct labor	***	***	***	***
COGS: Other factory costs	***	***	***	***
COGS: Total	***	***	***	***
Gross profit or (loss)	***	***	***	***
SG&A expenses	***	***	***	***
Operating income or (loss)	***	***	***	***
Net income or (loss)	***	***	***	***

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

Note: Changes reported as 0.00 or (0.00) represent nonzero values that are an increase or a decrease of less than 0.005, respectively.

Net sales

*** sales of Giorgio's certain preserved mushrooms were classified as U.S. commercial sales.[9] The previously-noted *** during first quarter 2020, in which *** on behalf of Giorgio, is reflected in Giorgio's reported sales and costs.[10] Giorgio did *** sell certain preserved mushrooms on a consignment basis during the period examined.[11]

Quantity

Total sales quantity of certain preserved mushrooms increased *** percent in 2020 and declined *** percent in 2021, reflecting the *** and *** annual sales quantities of the period, respectively. While Giorgio reported its *** annual sales quantity in 2021, annual production was at its *** level in that year (see table III-4).[12] Total sales quantity was *** percent lower in January-June 2022 compared to January-June 2021.

Value

Certain preserved mushroom sales AUVs remained within a relatively narrow range during the full-year period: declining *** percent to their lowest level of the period in 2020 and then increasing *** percent in 2021. In contrast and reflecting the highest level of the period, sales AUV was *** percent higher in January-June 2022 compared to January-June 2021 (see table VI-2).

In addition to efforts to pass through higher input costs in sales value, changes in sales AUVs include the impact of changes in product mix.[13] While AUVs for sales and total raw

[9] For the final phase of these investigations, Giorgio revised its reported sales values ***. Submission from ***, October 11, 2022.

[10] Giorgio U.S. producer questionnaire, response to II-6. Petitioner's postconference brief, Response to Staff Questions, p. 10.

[11] Petitioner's postconference brief, Response to Staff Questions, p. 13.

[12] ***. Submission from ***, April 25, 2022.

[13] As described by a Giorgio company official, ". . . there is a product mix factor at play that can affect your average {certain preserved mushrooms} unit value in every given year. . . {there are} different products, let's say whole button versus pieces and stem. That is one factor. You also have 4-ounce versus 8-ounce, and that can throw significant noise into your average unit value. And I will confirm, in particular through COVID, that our product mix was affected significantly and I do believe in particular that we were shipping much more of the higher 8-ounce product as well." Conference transcript, pp. 83-84 (Loiseau). Petitioner's postconference brief, Response to Staff Questions, p. 13.

material cost shared the same directional pattern for most of the period, the exception being 2019-20, the *** higher average sales AUV in January-June 2022 is more correlated with *** in terms of magnitude of change.[14]

Cost of goods sold and gross profit or loss

Raw materials and container cost

Total raw material cost (ranging from *** percent of total COGS (***) to *** percent (***)) is the *** primary component of certain preserved mushrooms COGS, the majority of total raw material cost in turn reflecting purchased fresh mushrooms.[15] [16] Other raw material costs, the smallest component of total raw material cost,

[14] ***. Submission from Counsel on behalf of Giorgio, October 11, 2022. As confirmed by a Giorgio company official, certain preserved mushrooms sales value does not incorporate a formulaic passthrough of raw material costs. Conference transcript, p. 85 (Loiseau).

[15] Fresh mushrooms are primarily purchased from related suppliers. Conference transcript, p. 86 (Loiseau). Giorgio's related mushroom growers also sell to unrelated customers, accounting for the majority of their total fresh mushroom sales. Conference transcript, p. 86 (Loiseau). ***. Giorgio U.S. producer questionnaire, response to III-9b.

[16] ***

(*continued*...)

reflects ***.[17] [18] As shown in table VI-1, the total AUV for raw material cost increased throughout the period, reaching its highest level in January-June 2022.

In January-June 2022, container costs were the *** primary component of COGS and the *** throughout the rest of the period: ranging from *** percent of COGS (***) to *** percent (***).[19] While the AUV for container costs declined overall during the full-year period, it was *** in January-June 2022 compared to January-June 2021 (see footnote 14).[20] [21]

Direct labor and other factory costs

For most of the period direct labor cost and other factory costs were, respectively, the *** primary components of total COGS: direct labor cost ranging from *** percent of total COGS (***) to *** percent (***); other factory costs ranging from *** percent (***) to *** percent (***). Note: Other factory costs accounted for the *** largest share of COGS in ***.

As shown in table VI-2, direct labor cost and other factory costs AUVs followed different directional patterns: direct labor cost AUVs *** during the full-year period and then somewhat lower in January-June 2022 compared to January-June 2021; other factory costs AUVs *** throughout the period. The overall decline in AUV other factory costs, reaching its lowest level in January-June 2022, is generally consistent with progressively *** certain

***. Submission from Counsel on behalf of Giorgio, April 25, 2022.

[17] Giorgio U.S. producer questionnaire, response to III-9c.

[18] For the final phase of these investigations, Giorgio revised its allocation of ***. Submission from Counsel on behalf of Giorgio, October 11, 2022.

[19] ***. Giorgio U.S. producer questionnaire, response to III-9d.

[20] A Giorgio company official noted ". . . our glass packaging also comes from a sister company overseas, so we were also affected by some of the international transport costs on those products . . . {accounting} for a very small piece of our business." Conference transcript, pp. 73-74 (Loiseau).

[21] ***. Giorgio U.S. producer questionnaire, response to III-7. ***. Ibid.

preserved mushrooms capacity utilization levels (see table III-4) and *** fixed cost absorption.[22] [23]

Gross profit or loss

Giorgio reported gross *** of varying magnitude on its operations on certain preserved mushrooms throughout most of the period, the *** being January-June 2022.[24] As shown in table VI-1, the gross *** ratio (total gross *** divided by total sales) expanded and then contracted, respectively, in 2020 and 2021. In 2020, the percentage decline in sales AUV exceeded the corresponding percentage decline in COGS AUV (see table VI-2), while in 2021, the positive impact of the increase in sales AUV was modestly amplified by a corresponding decline in COGS AUV, yielding, in conjunction with a decline in total sales quantity, a decline in total gross ***. At the end of the period, Giorgio transitioned to a modest ***, reflecting higher sales AUV in January-June 2022 compared to January-June 2021, which more than offset the corresponding, but smaller, increase in COGS AUV. As

[22] Production of certain preserved mushrooms and corresponding capacity utilization levels were noted as important factors in terms of overhead absorption. In the context of COGS, overhead absorption would generally refer to other factory costs and the extent to which these costs are spread over production volume. With regard to the importance of production volume, and in the context of private label versus branded product, a Giorgio company official noted that "The role that its {private label} has . . . is that it allows us to continue to produce additional volume under the label of a retailer. It is the exact same product. And usually the role of private label can be additional volume to help absorb your overhead costs to keep lines running and to continue to allow volume to flow through your business." Conference transcript, p. 65 (Loiseau). Similarly, but related to a question regarding the level at which the company routinely monitors certain preserved mushrooms financial results, it was noted ". . . we have to be more creative on those {financial} metrics, and then you get into variable contribution margin, you get into, well, what if the business goes away and we cannot even absorb the fixed cost base that the business previously had. All of these are mitigating factors that allow you to consider to continue to reduce your prices because it is the less of evils in terms of an overall impact it'll have on your P&L {profit and loss statement} if you keep or lose the business." Conference transcript, pp. 89-90 (Loiseau).

[23] Giorgio reported that its certain preserved mushrooms fixed costs ranged from *** percent of total other factory costs (***) to *** percent (***). Submission from Counsel on behalf of Giorgio, October 11, 2022. USITC auditor notes (prehearing). Fixed costs included in COGS were specified as part of other factory costs, indicating that total fixed costs included in COGS ranged from *** percent of total COGS (***) to *** percent (***). Ibid.

[24] Based on the breakout of fixed and variable costs provided by Giorgio (see footnote 23), the company's certain preserved mushrooms sales generated (at the COGS level) ***. Ibid. At the COGS level, a negative contribution margin means that total sales value was lower than variable COGS, while a positive contribution margin means total sales value exceeded variable COGS.

shown in table VI-2, higher overall COGS AUV in January-June 2022 primarily reflects an increase in *** (see also footnote 14).

Giorgio indicated that COVID-19 mitigation efforts impacted ***.[25] As described by the company, ***.[26]

SG&A expenses and operating income or loss

Total SG&A expenses *** throughout the full-year period and were *** in January-June 2022 compared to January-June 2021. SG&A expense ratios (total SG&A expenses divided by total sales) also *** throughout the period, reaching their *** level in January-June 2022. As noted above, Giorgio reported that the ***. Total SG&A expenses also reflect ***.[27]

Since Giorgio reported *** of varying magnitude for most of the period, total SG&A expenses generally amplified the level of operating ***. In the *** part of the period when *** was reported (***), it was more than *** by corresponding SG&A expenses.

Interest expense, other expenses and income, and net income or loss

With the exception of a relatively small level of ***, reported throughout the period, *** other items (i.e., interest expense or other expenses) were reported below operating results.[28] As such, operating and net results on certain preserved mushrooms (both sharing the same directional pattern of increasing *** in 2020, decreasing *** in 2021,

[25] ***. Giorgio U.S. producer questionnaire, responses to III-10 and III-11.
[26] Giorgio U.S. producer questionnaire, response to III-18.
[27] Verification report, p. 4.
[28] ***. Petitioner's postconference brief, Response to Staff Questions, p. 10.

and lower *** in January-June 2022 compared to January-June 2021) were almost the same amount throughout the period.

Capital expenditures, R&D expenses, total net assets, and return on assets

Table VI-3 presents Giorgio's capital expenditures, R&D expenses, total net assets, and ROA, respectively. Table VI-4 presents corresponding narrative descriptions.[29]

Table VI-3
Certain preserved mushrooms: Capital expenditures, R&D expenses, net assets, and ROA of the U.S. producer Giorgio, by period

Value in 1,000 dollars; ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Capital expenditures	Value	***	***	***	***	***
R&D expenses	Value	***	***	***	***	***
Total net assets	Value	***	***	***	NA	NA
Return on net assets	Ratio	***	***	***	NA	NA

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

Table VI-4
Certain preserved mushrooms: Narrative descriptions of the U.S. producer Giorgio's capital expenditures, R&D expenses, and total net assets

Firm	Narrative
Capital expenditures	***
R&D expenses	***
Total net assets	***

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

[29] ROA is calculated here as operating income divided by total assets. With respect to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which, in many instances, are not product specific. The ability of a U.S. producer to assign total asset values to discrete product lines affects the meaningfulness of calculated operating return on net assets.

Capital and investment

The Commission requested U.S. producers to describe any actual or potential negative effects of imports of certain preserved mushrooms from France, Netherlands, Poland, and Spain on their growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-5 presents the effects reported and table VI-6 provides the responding U.S. producer's narrative descriptions.

Table VI-5
Certain preserved mushrooms: Count indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2019, by effect

Number of firms reporting

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

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

Note.--***.

Table VI-6
Certain preserved mushrooms: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2019

Item	Firm name and accompanying narrative response
***	***
***	***
***	***
***	***
***	***
***	***

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

Note.--***.

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 France

The Commission issued foreign producers' or exporters' questionnaires to five firms believed to produce and/or export certain preserved mushrooms from France.[3] No firm responded to the Commission's final phase questionnaire, but one firm, Bonduelle Europe Long Life SAS ("Bonduelle Europe"), provided a usable response to the preliminary phase questionnaire. Select data provided by Bonduelle Europe are discussed in part VII and presented in tables in appendix F.[4] Bonduelle Europe's exports to the United States, as reported in its preliminary phase questionnaire, accounted for *** percent of U.S. imports of certain preserved mushrooms from France in 2021, as reported in final phase U.S. importer questionnaires. Bonduelle Europe estimated that it accounted for *** percent of 2021 production of certain preserved mushrooms in France.[5]

Changes in operations

Bonduelle Europe reported *** in its operations related to the production of certain preserved mushrooms since January 1, 2019, in its preliminary phase questionnaire response. ***.

[3] These firms, identified through a review of information submitted in the petition and presented in third-party sources, included: Bonduelle Europe Long Life SAS, Borde S.A., France Champignon, Provence Gourmet Sarl, and Sabarot Wassner S.A.

[4] *** certified that they had not produced or exported certain preserved mushrooms since January 1, 2019. ***. ***. Email from ***, September, 26, 2022.

[5] ***. Email from ***, April 26, 2022.

Operations on certain preserved mushrooms

Appendix F, table F-3 presents information on the certain preserved mushrooms operations of Bonduelle Europe. Capacity, production, and shipment data are ***.

Bonduelle Europe's overall theoretical capacity is *** pounds drained weight, but its practical overall capacity is *** pounds drained weight due to the ***.[6] Bonduelle Europe's certain preserved mushrooms capacity utilization rate was *** percent in 2021 and was projected to be ***. Home market shipments accounted for over *** percent of total shipments in 2021, while exports to the United States accounted for *** percent of total shipments in 2021.[7] Exports to all other markets accounted for *** percent of 2021 total shipments, and included exports to ***.

Alternative products

As presented in table F-4, Bonduelle Europe produced other products on the same equipment and machinery used to produce certain preserved mushrooms, including ***. In 2021, certain preserved mushrooms accounted for *** percent of total production using the same equipment and machinery used to produce certain preserved mushrooms.

[6] Bonduelle Europe reported that ***. Email from ***, April 26, 2022.

[7] While ***. Email from ***, April 26, 2022.

Exports

According to GTA, the leading export markets for certain preserved mushrooms in all container weights from France are the United States, Germany and Belgium (table VII-1). During 2021, the United States was the top export market for certain preserved mushrooms in all container sizes from France, accounting for 30.2 percent, followed by Germany, accounting for 20.2 percent.

Table VII-1
Preserved mushrooms in all container weights: Exports from France, by period
Quantity in 1,000 pounds drained weight; value in 1,000 dollars; unit value in dollars per pound; share in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	7,708	6,226	2,489
Germany	Quantity	1,772	1,680	1,664
Belgium	Quantity	841	1,372	880
Netherlands	Quantity	1,903	480	666
Algeria	Quantity	923	435	401
Greece	Quantity	68	443	368
Austria	Quantity	232	267	284
Morocco	Quantity	520	89	255
Spain	Quantity	28	204	134
All other destination markets	Quantity	2,217	1,960	1,095
All destination markets	Quantity	16,211	13,156	8,238
United States	Value	9,802	7,508	3,851
Germany	Value	2,519	2,686	2,856
Belgium	Value	1,360	1,711	1,153
Netherlands	Value	1,343	345	527
Algeria	Value	1,041	543	450
Greece	Value	100	449	410
Austria	Value	332	392	448
Morocco	Value	456	94	184
Spain	Value	40	394	236
All other destination markets	Value	2,294	2,116	1,409
All destination markets	Value	19,287	16,240	11,523

Table continued.

Table VII-1 Continued
Preserved mushrooms in all container weights: Exports from France, by period

Unit value in dollars per pound; share in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	1.27	1.21	1.55
Germany	Unit value	1.42	1.60	1.72
Belgium	Unit value	1.62	1.25	1.31
Netherlands	Unit value	0.71	0.72	0.79
Algeria	Unit value	1.13	1.25	1.12
Greece	Unit value	1.47	1.01	1.11
Austria	Unit value	1.43	1.47	1.58
Morocco	Unit value	0.88	1.06	0.72
Spain	Unit value	1.44	1.93	1.75
All other destination markets	Unit value	1.03	1.08	1.29
All destination markets	Unit value	1.19	1.23	1.40
United States	Share of quantity	47.5	47.3	30.2
Germany	Share of quantity	10.9	12.8	20.2
Belgium	Share of quantity	5.2	10.4	10.7
Netherlands	Share of quantity	11.7	3.6	8.1
Algeria	Share of quantity	5.7	3.3	4.9
Greece	Share of quantity	0.4	3.4	4.5
Austria	Share of quantity	1.4	2.0	3.4
Morocco	Share of quantity	3.2	0.7	3.1
Spain	Share of quantity	0.2	1.6	1.6
All other destination markets	Share of quantity	13.7	14.9	13.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 2003.10 as reported by Eurostat in the Global Trade Atlas database, accessed October 3, 2022. The exports presented in this table likely include out-of-scope merchandise, as HS subheading 2003.10 includes preserved mushrooms in containers holding more than 255 grams (approximately 9 ounces). In-scope merchandise does not include preserved mushrooms in containers holding greater than 12 ounces (340 grams).

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data.

The industry in the Netherlands

The Commission issued foreign producers' or exporters' questionnaires to four firms believed to produce and/or export certain preserved mushrooms from the Netherlands.[8] Usable responses to the Commission's questionnaire were received from two firms:[9] Okechamp BV[10] and Prochamp BV.[11] Because Commerce preliminarily determined a zero-dumping margin for Prochamp BV, only Okechamp BV's data are presented in part VII. Prochamp BV's data are presented in appendix G. Okechamp BV's exports to the United States accounted for approximately *** percent of U.S. imports of certain preserved mushrooms from subject sources in the Netherlands in 2021, as reported in the Commission's U.S. importer questionnaires. According to Okechamp BV's estimate, the production of certain preserved mushrooms in the Netherlands reported in its questionnaire accounts for approximately *** percent of overall production of certain preserved mushrooms in the Netherlands.[12]

[8] These firms, FLM Food Ingredients BV, Okechamp BV, Prochamp BV, and Scelta Mushrooms BV, were identified through a review of information submitted in the petitions and presented in third-party sources.

[9] *** certified that they had not produced or exported certain preserved mushrooms since January 1, 2019.

[10] In 2021, Greenyard Prepared Vineyards (Netherlands) was acquired by the Cornerstone investment group. This resulted in the Polish producer of certain preserved mushrooms, Okechamp SA, combining with Greenyard Prepared Vineyards. Greenyard Prepared Vineyards' name became Okechamp BV and the two firms combined became the Okechamp Group. According to its website, Poland is the largest producer of mushrooms in Europe, with an annual volume of 340,000 tons of mushrooms per year (both preserved and fresh). The second largest producer is the Netherlands with production of 300,000 tons per year, specializing in mechanically harvested and eventually processed mushrooms. The Okechamp Group further intends to invest and expand production of mushrooms in the Netherlands. https://okechamp.pl/en/polskie-firmy-wchodza-na-zagraniczne-rynki-i-tworza-wspolny-projekt/. Announced on March 1, 2022.

[11] Prochamp is a fully integrated mushroom production company, and it details its production processes on its website: https://prochamp.nl/about-us/production-process/

[12] ***. Staff estimates that Prochamp BV's 2021 production accounted for *** percent of total 2021 production in the Netherlands, based on Okechamp BV's percentage estimate (*** percent) for its 2021 production. Prochamp BV ***. Email from ***, April 22, 2022. In addition to itself and Prochamp BV, Okechamp BV identified *** as a Dutch producer, but this company has certified it has not produced or exported certain preserved mushrooms since January 1, 2019. Email from ***, April 25, 2022. Given that no other Dutch producer has been identified other than Prochamp BV and Okechamp BV, staff estimates that Okechamp BV's production accounts for all subject production from the Netherlands.

Table VII-2 presents information on the certain preserved mushrooms operations of the responding producer and exporter in the Netherlands.

Table VII-2
Certain preserved mushrooms: Summary data for producer in the Netherlands, 2021

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

Firm	Production (1,000 pounds drained weight)	Share of reported production (percent)	Exports to the United States (1,000 pounds drained weight)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds drained weight)	Share of firm's total shipments exported to the United States (percent)
Okechamp BV	***	100.0	***	100.0	***	***

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

Changes in operations

Okechamp BV was asked to report any change in the character of its operations or organization relating to the production of certain preserved mushrooms since 2019. Okechamp BV reported it underwent a consolidation in ***, as presented in table VII-3.

Table VII-3
Certain preserved mushrooms: Reported changes in operations in the Netherlands since January 1, 2019, by firm

Item	Firm name and accompanying narrative response
Consolidations	***

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

Operations on certain preserved mushrooms

Table VII-4 presents information on the certain preserved mushrooms operations of responding Dutch producer Okechamp BV. Its practical certain preserved mushrooms capacity ***. Production increased by *** percent from 2019 to 2020, then decreased by *** percent from 2020 to 2021, for an overall *** percent decrease in production during 2019-21. Production was *** percent lower in interim 2022 than in interim 2021. With ***, capacity utilization followed production trends, increasing by *** percentage points from 2019 to 2020, then decreasing by *** percentage points from 2020 to 2021, for an overall *** percentage point decrease during 2019-21. Capacity utilization was *** percentage points lower in interim 2022 than in interim 2021.

Export shipments accounted for the majority (between *** and *** percent) of Okechamp BV's shipments during the period for which data were collected. Exports to the United States accounted for between *** to *** of total shipments throughout the period for which data were collected. Other major export markets include ***. Exports to the United States increased during 2019-21, by *** percent, but were *** percent lower in interim 2022 than in interim 2021.[13] Exports to all other markets increased by *** percent from 2019 to 2020, then decreased by *** percent from 2020 to 2021, for an overall *** percent decrease during 2019-21. Home market shipments decreased *** percent during 2019-21 but were *** percent higher in interim 2022 than in interim 2021.

Home market shipments and exports to the United States are projected to decrease from 2021 to 2022,[14] by *** percent and *** percent, respectively, while exports to all other markets are projected to increase by *** percent.

During 2019-21, the inventory to production ratio ranged from *** to *** percent, and the inventory to total shipment ratio ranged from *** to *** percent.

[13] ***. Email from ***, October 12, 2022.

[14] ***. Email from ***, October 12, 2022.

Table VII-4
Certain preserved mushrooms: Data on industry in the Netherlands, by period

Quantity in 1,000 pounds drained weight

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption or transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-4 Continued
Certain preserved mushrooms: Data on industry in the Netherlands, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption or transfers share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Alternative products

Table VII-5 presents Okechamp BV's capacity, production, and capacity utilization of its certain preserved mushroom production and overall production on machinery used to produce certain preserved mushrooms. Okechamp BV's practical overall and practical certain preserved mushrooms capacity calculations assumed its normal operating parameters of ***. To calculate installed capacity, it added ***.

Table VII-5
Certain preserved mushrooms: Producer Okechamp BV in the Netherlands capacity and production on the same equipment as subject production, by period

Capacity and production in 1,000 pounds drained weight; utilization in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical certain preserved mushrooms	Capacity	***	***	***	***	***
Practical certain preserved mushrooms	Production	***	***	***	***	***
Practical certain preserved mushrooms	Utilization	***	***	***	***	***

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

Table VII-6 presents Okechamp BV's reported production constraints.

Table VII-6
Certain preserved mushrooms: Dutch producer Okechamp BV's narratives regarding production constraints in the Netherlands

Item	Firm name and narrative response on production constraints
Production bottlenecks	***
Fuel or energy	***
Logistics/transportation	***

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

As shown in table VII-7, responding Dutch firm Okechamp BV produced *** on the same equipment and machinery used to produce certain preserved mushrooms. The share of overall production used to produce certain preserved mushrooms increased by *** percentage points during 2019-20, then decreased by *** percentage points during 2020-21.[15]

Okechamp BV reported that ***.[16]

Table VII-7
Certain preserved mushrooms: Dutch producer Okechamp BV's production on the same equipment as subject production, by period

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

Production type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Certain preserved mushrooms	Quantity	***	***	***	***	***
Preserved mushrooms in large containers	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Certain preserved mushrooms	Share	***	***	***	***	***
Preserved mushrooms in large containers	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope production	Share	***	***	***	***	***
Total production	Share	100.0	100.0	100.0	100.0	100.0

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

[15] Okechamp BV cited *** as the reason for the increased share of overall production towards in-scope merchandise in 2020. Email from ***, October 12, 2022.

[16] Okechamp BV's foreign producer questionnaire response, question II-4b.

Exports

According to GTA, the leading export markets for preserved mushrooms in all container weights from the Netherlands are Belgium and the United States (table VII-8). During 2021, Belgium was the top export market for preserved mushrooms in all container weights from the Netherlands, accounting for 52.0 percent, followed by the United States, accounting for 13.7 percent.

Table VII-8
Preserved mushrooms in all container weights: Exports from the Netherlands, by period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars

Destination market	Measure	2019	2020	2021
United States	Quantity	45,862	43,596	41,249
Belgium	Quantity	74,632	123,682	156,778
Germany	Quantity	19,574	30,075	25,784
France	Quantity	10,216	18,158	23,438
Italy	Quantity	10,076	9,883	9,599
United Kingdom	Quantity	3,651	4,701	5,897
Israel	Quantity	3,956	2,925	5,541
Greece	Quantity	5,366	4,585	3,476
Spain	Quantity	480	821	2,589
All other destination markets	Quantity	24,698	31,297	27,006
All destination markets	Quantity	198,511	269,721	301,356
United States	Value	57,390	57,253	66,755
Belgium	Value	74,162	98,625	106,167
Germany	Value	19,399	24,824	32,153
France	Value	10,733	11,195	25,194
Italy	Value	5,084	4,214	6,653
United Kingdom	Value	2,580	3,107	7,010
Israel	Value	6,174	5,255	8,207
Greece	Value	3,571	2,977	2,940
Spain	Value	573	1,209	3,301
All other destination markets	Value	25,963	32,485	31,902
All destination markets	Value	205,627	241,144	290,282

Table continued.

Table VII-8 Continued
Preserved mushrooms in all container weights: Exports from the Netherlands, by period

Unit value in dollars per pound drained weight; share in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	1.25	1.31	1.62
Belgium	Unit value	0.99	0.80	0.68
Germany	Unit value	0.99	0.83	1.25
France	Unit value	1.05	0.62	1.07
Italy	Unit value	0.50	0.43	0.69
United Kingdom	Unit value	0.71	0.66	1.19
Israel	Unit value	1.56	1.80	1.48
Greece	Unit value	0.67	0.65	0.85
Spain	Unit value	1.19	1.47	1.28
All other destination markets	Unit value	1.05	1.04	1.18
All destination markets	Unit value	1.04	0.89	0.96
United States	Share of quantity	23.1	16.2	13.7
Belgium	Share of quantity	37.6	45.9	52.0
Germany	Share of quantity	9.9	11.2	8.6
France	Share of quantity	5.1	6.7	7.8
Italy	Share of quantity	5.1	3.7	3.2
United Kingdom	Share of quantity	1.8	1.7	2.0
Israel	Share of quantity	2.0	1.1	1.8
Greece	Share of quantity	2.7	1.7	1.2
Spain	Share of quantity	0.2	0.3	0.9
All other destination markets	Share of quantity	12.4	11.6	9.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 2003.10 as reported by Eurostat in the Global Trade Atlas database, accessed October 3, 2022.The exports presented in this table likely include out-of-scope merchandise, as HS subheading 2003.10 includes preserved mushrooms in containers holding more than 255 grams (approximately 9 ounces). In-scope merchandise does not include preserved mushrooms in containers holding greater than 12 ounces (340 grams).

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data.

Note: Data for Netherlands include merchandise imported from all Netherlands producers/exporters, including nonsubject merchandise from Prochamp.

The industry in Poland

The Commission issued foreign producers' or exporters' questionnaires to six firms believed to produce and/or export certain preserved mushrooms from Poland.[17] A usable response to the Commission's questionnaire was received from one firm, Okechamp SA.[18] This firm's exports to the United States accounted for *** percent of U.S. imports of certain preserved mushrooms from Poland in 2021, as reported in the Commission's U.S. importer questionnaires. According to the estimate requested of the responding producer in Poland, the production of certain preserved mushrooms in Poland reported in its questionnaire accounts for approximately *** percent of overall production of certain preserved mushrooms in Poland.[19] Table VII-9 presents information on the Poland operations of the responding producer and exporter in Poland.

Table VII-9
Certain preserved mushrooms: Summary data for producer in Poland, 2021

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

Firm	Production (1,000 pounds drained weight)	Share of reported production (percent)	Exports to the United States (1,000 pounds drained weight)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds drained weight)	Share of firm's total shipments exported to the United States (percent)
Okechamp SA	***	100.0	***	100.0	***	***

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

[17] These firms, Bofmar PC, Bonduelle Poland, FH Rolnik SPJ, Malpol, Obrako Sp. z.o.o, and Okechamp SA, were identified through a review of information submitted in the petitions and presented in third-party sources. One firm, ***.

[18] Bonduelle Poland submitted a foreign producer questionnaire response during the preliminary phase of the investigations but did not submit a final phase questionnaire response. In its preliminary phase questionnaire response, it reported ***. Email from ***, April 26, 2022.

[19] In its preliminary phase questionnaire response, Bonduelle Poland estimated that its production accounted for *** percent of total 2021 production in Poland of certain preserved mushrooms. *** indicated that other Polish companies may be involved in the certain preserved mushroom business, including ***. Email from ***, April 25, 2022.

Changes in operations

The responding producer in Poland was asked to report any changes in the character of its operations or organization relating to the production of certain preserved mushrooms since January 1, 2019. As presented in table VII-10, the responding producer reported such changes.

Table VII-10
Certain preserved mushrooms: Reported changes in operations in Poland since January 1, 2019, by firm

Item	Firm name and accompanying narrative response
Plant openings	***
Consolidations	***
Other	***

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

Operations on certain preserved mushrooms

Table VII-11 presents information on the certain preserved mushrooms operations of the responding producer and exporter in Poland.

Capacity increased by *** percent during 2019-21 and was *** in the interim periods, but is projected to decrease by *** percent from 2021 to 2022. [20]

Production increased by *** percent during 2019-21, but was *** percent lower in interim 2022 than in interim 2021. Production is projected to increase by *** percent from 2021 to 2022. Given the higher increase in capacity than production, capacity utilization decreased during 2019-21 by *** percentage points and was *** percentage points lower in interim 2022 than in interim 2021. With capacity projected to decrease by *** percent from 2021 to 2022, capacity utilization is projected to increase by *** percentage points.

Export shipments accounted for the *** (over *** percent in all periods) of the Polish producer's shipments. Between *** and *** percent of export shipments were exported to the United States during the period for which data were collected. Other major export markets include: ***. Exports to the United States, exports to all other markets, and home market shipments all increased during 2019-2021, by ***, ***, and *** percent, respectively.[21] Exports to the United States were *** percent higher in interim 2022 than in interim 2021, while exports to all other markets and home market shipments were lower in interim 2022 than in interim 2021, by *** and *** percent, respectively.[22]

Exports to the United States are projected to increase by *** percent from 2021 to 2022, while home market shipments and exports to all other markets are projected to decrease, by *** percent and *** percent, respectively.

[20] ***.

[21] ***.

[22] ***.

The inventory to production and inventory to total shipments ratios both decreased during 2019-21, by *** and *** percentage points respectively, during 2019-21, and were *** and *** percentage points lower in interim 2022 than in interim 2021, respectively.

Table VII-11
Certain preserved mushrooms: Data on industry in Poland, by period

Quantity in 1,000 pounds drained weight

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption or transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-11 Continued
Certain preserved mushrooms: Data on industry in Poland, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption or transfers share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

Table VII-12 presents Okechamp SA's capacity, production, and capacity utilization of its certain preserved mushroom production and overall production on machinery used to produce certain preserved mushrooms. ***.

Table VII-12
Certain preserved mushrooms: Polish producer Okechamp SA's capacity and production on the same equipment as subject production, by period

Capacity and production in 1,000 pounds drained weight; utilization in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical certain preserved mushrooms	Capacity	***	***	***	***	***
Practical certain preserved mushrooms	Production	***	***	***	***	***
Practical certain preserved mushrooms	Utilization	***	***	***	***	***

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

Table VII-13 presents Okechamp SA's reported production constraints.

Table VII-13
Certain preserved mushrooms: Polish producer Okechamp SA's narratives regarding production constraints in the Netherlands

Item	Firm name and narrative response on production constraints
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Fuel or energy	***
Logistics/transportation	***

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

As shown in table VII-14, the responding firm in Poland produced other products on the same equipment and machinery used to produce certain preserved mushrooms, including ***.[23] Certain preserved mushrooms accounted for around *** of overall production during the period for which data were collected.

Table VII-14
Certain preserved mushrooms: Polish producer Okechamp SA's overall capacity and production on the same equipment as subject production, by period

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

Production type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Certain preserved mushrooms	Quantity	***	***	***	***	***
Preserved mushrooms in large containers	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Certain preserved mushrooms	Share	***	***	***	***	***
Preserved mushrooms in large containers	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope production	Share	***	***	***	***	***
Total production	Share	100.0	100.0	100.0	100.0	100.0

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

[23] ***. Email from ***, April 25, 2022.

Exports

According to GTA, the leading export markets for preserved mushrooms in all container weights from Poland are Germany, the United States, and the Netherlands (table VII-15). During 2021, Germany was the top export market for preserved mushrooms in all container weights from Poland, accounting for 42.2 percent, followed by the United States, accounting for 15.2 percent.

Table VII-15
Preserved mushrooms in all container weights: Exports from Poland, by period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars

Destination market	Measure	2019	2020	2021
United States	Quantity	7,369	12,235	16,745
Germany	Quantity	43,597	43,536	46,590
Netherlands	Quantity	9,479	10,316	12,117
France	Quantity	2,704	4,205	5,674
Sweden	Quantity	1,870	3,886	4,691
Italy	Quantity	5,839	4,114	3,946
Romania	Quantity	2,869	3,764	3,814
Israel	Quantity	3,624	3,529	3,270
Denmark	Quantity	1,800	1,898	2,725
All other destination markets	Quantity	10,818	12,211	10,815
All destination markets	Quantity	89,969	99,695	110,388
United States	Value	7,238	11,352	18,120
Germany	Value	50,923	51,712	47,016
Netherlands	Value	13,225	14,775	17,407
France	Value	3,678	6,114	8,358
Sweden	Value	2,001	2,618	2,520
Italy	Value	6,815	5,180	5,235
Romania	Value	3,427	4,753	4,852
Israel	Value	3,994	4,031	3,914
Denmark	Value	1,946	2,326	1,900
All other destination markets	Value	11,337	12,009	11,912
All destination markets	Value	104,585	114,870	121,233

Table continued.

Table VII-15 Continued
Preserved mushrooms in all container weights: Exports from Poland, by period

Unit value in dollars per pound; share in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	0.98	0.93	1.08
Germany	Unit value	1.17	1.19	1.01
Netherlands	Unit value	1.40	1.43	1.44
France	Unit value	1.36	1.45	1.47
Sweden	Unit value	1.07	0.67	0.54
Italy	Unit value	1.17	1.26	1.33
Romania	Unit value	1.19	1.26	1.27
Israel	Unit value	1.10	1.14	1.20
Denmark	Unit value	1.08	1.23	0.70
All other destination markets	Unit value	1.05	0.98	1.10
All destination markets	Unit value	1.16	1.15	1.10
United States	Share of quantity	8.2	12.3	15.2
Germany	Share of quantity	48.5	43.7	42.2
Netherlands	Share of quantity	10.5	10.3	11.0
France	Share of quantity	3.0	4.2	5.1
Sweden	Share of quantity	2.1	3.9	4.2
Italy	Share of quantity	6.5	4.1	3.6
Romania	Share of quantity	3.2	3.8	3.5
Israel	Share of quantity	4.0	3.5	3.0
Denmark	Share of quantity	2.0	1.9	2.5
All other destination markets	Share of quantity	12.0	12.2	9.8
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 2003.10 as reported by Eurostat in the Global Trade Atlas database, accessed October 3, 2022.The exports presented in this table likely include out-of-scope merchandise, as HS subheading 2003.10 includes preserved mushrooms in containers holding more than 255 grams (approximately 9 ounces). In-scope merchandise does not include preserved mushrooms in containers holding greater than 12 ounces (340 grams).

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data.

The industry in Spain

The Commission issued foreign producers' or exporters' questionnaires to five firms believed to produce and/or export certain preserved mushrooms from Spain.[24] A usable response to the Commission's questionnaire was received from one firm: Eurochamp S.A.T. ("Eurochamp").[25] This firm's exports to the United States accounted for approximately *** percent of U.S. imports of certain preserved mushrooms from Spain in 2021, as reported in the Commission's U.S. importer questionnaires. According to estimates requested of the responding producer in Spain, the production of certain preserved mushrooms in Spain reported in its questionnaire accounts for approximately *** percent of overall production of certain preserved mushrooms in Spain. Table VII-16 presents information on the operations of the responding producer and exporter in Spain.

Table VII-16
Certain preserved mushrooms: Summary data for producer in Spain, 2021

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

Firm	Production (1,000 pounds drained weight)	Share of reported production (percent)	Exports to the United States (1,000 pounds drained weight)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds drained weight)	Share of firm's total shipments exported to the United States (percent)
Eurochamp	***	100.0	***	100.0	***	***

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

[24] These firms, Celorrio, Champinones Megias, Conservas Ferba S.A., Eurochamp S.A.T., and Neofungi, were identified through a review of information submitted in the petition and presented in third-party sources.

[25] According to its website, Eurochamp consists of two companies for the manufacturing and marketing of its certain preserved mushrooms that report 300 employees and 90,000 tons of annual production. Additionally, it accounts for 80 percent of total production of mushrooms (cans) in Spain. https://www.eurochamp.es/en/50-years-cultivating/.

Changes in operations

The producer in Spain was asked to report any change in the character of its operations or organization relating to the production of certain preserved mushrooms since 2019. Table VII-17 presents the changes identified by this producer.[26]

Table VII-17
Certain preserved mushrooms: Reported changes in operations in Spain since January 1, 2019, by firm

Item	Firm name and accompanying narrative response
Acquisitions	***

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

[26] ***. Email from ***, October 21, 2022.

Operations on certain preserved mushrooms

Table VII-18 presents information on the certain preserved mushrooms operations of the responding producer and exporter in Spain. The responding producer's capacity decreased by *** percent from 2020 to 2021 but is projected to *** by 2023.[27] Production increased by *** percent from 2019 to 2020, then decreased by *** percent from 2020 to 2021, for an overall *** percent increase in production during 2019-21. Production was *** percent lower in interim 2022 than in interim 2021, and is projected to further decrease by *** percent from 2021 to 2022.[28] Capacity utilization followed production trends, increasing *** percentage points from 2019 to 2020, then decreasing *** percentage points from 2020 to 2021, for an overall *** percentage point increase during 2019-21. Capacity utilization was *** percentage points lower in interim 2022 than in interim 2021 and is projected to decrease by *** percentage points between 2022 and 2023.

During 2019 and 2020, Eurochamp's shipments were ***. Eurochamp's home market shipments increased from 2019 to 2020 by *** percent. In *** 2021, Eurochamp ***, the *** of its total shipments were exports to all other markets,[29] followed by *** percent commercial home market shipments, and *** percent exports to the United States.

Exports to the United States are projected to increase from 2022 to 2023 by *** percent, while home market shipments and exports to all other markets are projected to decrease from 2022 to 2023, by *** percent and *** percent, respectively.

End-of-period inventories decreased by *** percent during 2019-21, and was *** percent lower in interim 2022 than in interim 2021, but they are projected to increase by *** percent during 2021-22, then decrease by *** percent during 2022-23.

[27] ***. Email from ***, October 21, 2022.

[28] Eurochamp projects a decrease in production ***.

[29] Principal export markets include: ***.

Table VII-18
Certain preserved mushrooms: Data on industry in Spain, by period

Quantity in 1,000 pounds drained weight

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption or transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-18 Continued
Certain preserved mushrooms: Data on industry in Spain, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption or transfers share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

Table VII-19 presents Eurochamp's capacity, production, and capacity utilization of its certain preserved mushroom production and overall production on machinery used to produce certain preserved mushrooms. Installed capacity is based on ***. Practical overall and practical certain preserved mushroom capacity take into account the ***.

Table VII-19
Certain preserved mushrooms: Spanish producer Eurochamp's capacity and production on the same equipment as subject production, by period

Capacity and production in 1,000 pounds drained weight; utilization in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical certain preserved mushrooms	Capacity	***	***	***	***	***
Practical certain preserved mushrooms	Production	***	***	***	***	***
Practical certain preserved mushrooms	Utilization	***	***	***	***	***

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

Table VII-20 presents Eurochamp's reported production constraints. Eurochamp's main capacity constraint is ***.

Table VII-20
Certain preserved mushrooms: Spanish producer Eurochamp's narratives regarding production constraints in Spain

Item	Firm name and narrative response on production constraints
Supply of material inputs	***

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

As shown in table VII-21, the responding firm in Spain produced other products on the same equipment and machinery used to produce certain preserved mushrooms ***. Certain preserved mushrooms' share of total production increased by *** percentage points during 2019-21, but was *** percentage points lower in interim 2022 than in interim 2021.

Table VII-21
Certain preserved mushrooms: Producer's in Spain overall capacity and production on the same equipment as subject production, by period

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

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Certain preserved mushrooms	Quantity	***	***	***	***	***
Preserved mushrooms in large containers	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope production	Quantity	***	***	***	***	***
Total production	Quantity	***	***	***	***	***
Certain preserved mushrooms	Share	***	***	***	***	***
Preserved mushrooms in large containers	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope production	Share	***	***	***	***	***
Total production	Share	100.0	100.0	100.0	100.0	100.0

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

Exports

According to GTA, the leading export markets for preserved mushrooms in all container weights from Spain are Portugal and the United States (table VII-22). During 2021, Portugal was the top export market for preserved mushrooms in all container weights from Spain, accounting for 31.0 percent, followed by the United States, accounting for 30.5 percent.

Table VII-22
Preserved mushrooms in all container weights: Exports from Spain, by period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars; unit value in dollars per dollar; share in percent

Destination market	Measure	2019	2020	2021
United States	Quantity	6,824	7,847	8,087
Portugal	Quantity	11,183	4,647	8,230
Italy	Quantity	5,800	2,919	2,853
France	Quantity	11,651	3,408	2,171
Saudi Arabia	Quantity	995	851	891
Israel	Quantity	599	380	841
Morocco	Quantity	296	257	617
Jordan	Quantity	198	225	391
United Kingdom	Quantity	260	17	295
All other destination markets	Quantity	3,877	2,051	2,157
All destination markets	Quantity	41,682	22,603	26,534
United States	Value	7,761	8,775	9,844
Portugal	Value	15,300	14,195	14,946
Italy	Value	7,346	5,924	6,965
France	Value	15,532	19,977	18,467
Saudi Arabia	Value	1,216	1,054	992
Israel	Value	692	494	1,062
Morocco	Value	362	338	670
Jordan	Value	174	195	324
United Kingdom	Value	310	133	318
All other destination markets	Value	4,945	4,220	4,300
All destination markets	Value	53,639	55,305	57,889

Table continued.

Table VII-22 Continued
Preserved mushrooms in all container weights: Exports from Spain, by period

Unit value in dollars per dollar; share in percent

Destination market	Measure	2019	2020	2021
United States	Unit value	1.14	1.12	1.22
Portugal	Unit value	1.37	3.05	1.82
Italy	Unit value	1.27	2.03	2.44
France	Unit value	1.33	5.86	8.51
Saudi Arabia	Unit value	1.22	1.24	1.11
Israel	Unit value	1.16	1.30	1.26
Morocco	Unit value	1.22	1.31	1.09
Jordan	Unit value	0.88	0.87	0.83
United Kingdom	Unit value	1.19	7.94	1.08
All other destination markets	Unit value	1.28	2.06	1.99
All destination markets	Unit value	1.29	2.45	2.18
United States	Share of quantity	16.4	34.7	30.5
Portugal	Share of quantity	26.8	20.6	31.0
Italy	Share of quantity	13.9	12.9	10.8
France	Share of quantity	28.0	15.1	8.2
Saudi Arabia	Share of quantity	2.4	3.8	3.4
Israel	Share of quantity	1.4	1.7	3.2
Morocco	Share of quantity	0.7	1.1	2.3
Jordan	Share of quantity	0.5	1.0	1.5
United Kingdom	Share of quantity	0.6	0.1	1.1
All other destination markets	Share of quantity	9.3	9.1	8.1
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 2003.10 as reported by Eurostat in the Global Trade Atlas database, accessed October 3, 2022.The exports presented in this table likely include out-of-scope merchandise, as HS subheading 2003.10 includes preserved mushrooms in containers holding more than 255 grams (approximately 9 ounces). In-scope merchandise does not include preserved mushrooms in containers holding greater than 12 ounces (340 grams).

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data.

Subject countries combined

Table VII-23 presents summary data on certain preserved mushrooms operations of the reporting subject producers in the subject countries.

Table VII-23
Certain preserved mushrooms: Data on the industry in aggregated subject sources, by period

Quantity in 1,000 pounds drained weight

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	169,424	172,008	179,387	91,211	89,694	169,327	172,362
Production	119,340	142,123	127,255	75,899	67,269	129,882	128,421
End-of-period inventories	22,498	22,704	19,619	28,367	24,549	23,494	16,152
Internal consumption or transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	90,399	107,507	107,729	54,357	58,701	118,624	118,531
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-23 Continued
Certain preserved mushrooms: Data on the industry in aggregated subject sources, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	70.2	85.5	75.3	85.9	78.4	79.2	77.3
Inventory ratio to production	17.7	14.7	14.0	17.6	16.4	16.4	12.0
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption or transfers share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

U.S. inventories of imported merchandise

Table VII-24 presents data on U.S. importers' reported inventories of certain preserved mushrooms. End-of-period inventories of imports from subject sources decreased by 57.2 percent from 2019 to 2020, then increased by 115.4 percent from 2020 to 2021, for an overall 7.8 percent decrease during 2019-21. End-of-period inventories were 91.2 percent higher in interim 2022 than in interim 2021.

Subject imports and shipments of subject imports both increased between 2019 and 2020, while end-of-period inventories decreased, resulting in an 8.8 percentage point decrease in the inventory ratio to subject imports and a 9.6 percentage point decrease in the inventory ratio to U.S. shipments of subject imports. Subject imports and shipments of subject imports then decreased between 2020 and 2021, while end-of-period inventories increased, resulting in a 6.8 percentage point increase in the inventory ratio to subject imports and an 8.1 percentage point increase in the inventory ratio to U.S. shipments of subject imports.

Table VII-24
Certain preserved mushrooms: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds drained weight; ratio in percent

Measure	Source	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Inventories quantity	France	***	***	***	***	***
Ratio to imports	France	***	***	***	***	***
Ratio to U.S. shipments of imports	France	***	***	***	***	***
Ratio to total shipments of imports	France	***	***	***	***	***
Inventories quantity	Netherlands, subject	***	***	***	***	***
Ratio to imports	Netherlands, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Netherlands, subject	***	***	***	***	***
Ratio to total shipments of imports	Netherlands, subject	***	***	***	***	***
Inventories quantity	Poland	***	***	***	***	***
Ratio to imports	Poland	***	***	***	***	***
Ratio to U.S. shipments of imports	Poland	***	***	***	***	***
Ratio to total shipments of imports	Poland	***	***	***	***	***
Inventories quantity	Spain	***	***	***	***	***
Ratio to imports	Spain	***	***	***	***	***
Ratio to U.S. shipments of imports	Spain	***	***	***	***	***
Ratio to total shipments of imports	Spain	***	***	***	***	***
Inventories quantity	Subject	4,898	2,096	4,514	3,010	5,754
Ratio to imports	Subject	14.7	5.9	12.7	7.8	19.7
Ratio to U.S. shipments of imports	Subject	15.1	5.5	13.6	8.3	21.5
Ratio to total shipments of imports	Subject	15.1	5.5	13.6	8.3	21.5
Inventories quantity	Netherlands, nonsubject	***	***	***	***	***
Ratio to imports	Netherlands, nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Netherlands, nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Netherlands, nonsubject	***	***	***	***	***
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	2,373	2,362	3,599	3,066	2,425
Ratio to imports	Nonsubject	45.9	49.4	44.9	35.1	41.3
Ratio to U.S. shipments of imports	Nonsubject	52.3	49.2	53.1	41.8	29.5
Ratio to total shipments of imports	Nonsubject	52.3	49.2	53.1	41.8	29.5
Inventories quantity	All	7,271	4,458	8,113	6,076	8,179
Ratio to imports	All	18.9	11.1	18.6	12.8	23.3
Ratio to U.S. shipments of imports	All	19.6	10.4	20.4	13.9	23.4
Ratio to total shipments of imports	All	19.6	10.4	20.3	13.9	23.4

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of certain preserved mushrooms from France, the Netherlands, Poland, Spain, and all other sources after June 30, 2022. Their reported data are presented in table VII-25. Arranged imports from each subject source were reported, as well as arranged imports from nonsubject sources.

Table VII-25
Certain preserved mushrooms: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds drained weight

Source	Jul-Sept 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023	Total
France	***	***	***	***	***
Netherlands, subject	***	***	***	***	***
Poland	***	***	***	***	***
Spain	***	***	***	***	***
Subject sources	***	***	***	***	***
Netherlands, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Third-country trade actions

Based on available information,[30] certain preserved mushrooms from France, the Netherlands, Poland, and Spain have not been subject to antidumping or countervailing duty investigations outside the United States.[31]

Information on nonsubject countries

In its postconference brief during the preliminary investigations, the petitioner reported that no data on global or country-level production or prices of certain preserved mushrooms currently exists. Industry research also found no sources for this information. Table VII-26 presents global export data for prepared and/or preserved mushrooms other than by vinegar or

[30] World Trade Organization ("WTO"), "Anti-dumping."
[31] Conference transcript, p. 46 (Herrmann).

acetic acid, a category that includes certain preserved mushrooms and out-of-scope products by source.

Table VII-26
Preserved mushrooms in all container weights: Global exports by exporter and period

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

Exporting country	Measure	2019	2020	2021
United States	Quantity	1,217	689	973
France	Quantity	16,211	13,156	8,238
Netherlands	Quantity	198,511	269,721	301,356
Poland	Quantity	89,969	99,695	110,388
Spain	Quantity	41,682	22,603	26,534
All subject exporters	Quantity	346,372	405,175	446,515
China	Quantity	435,301	409,725	376,975
Belgium	Quantity	82,093	85,331	88,607
Indonesia	Quantity	4,151	4,258	4,818
Germany	Quantity	4,029	4,899	4,409
Italy	Quantity	3,359	2,837	3,072
Belarus	Quantity	1,326	2,995	2,658
Hungary	Quantity	2,205	2,069	2,536
All other exporters	Quantity	547,993	525,383	497,546
All reporting exporters	Quantity	894,366	930,559	944,062
United States	Value	1,916	975	1,248
France	Value	19,287	16,240	11,523
Netherlands	Value	205,627	241,144	290,282
Poland	Value	104,585	114,870	121,233
Spain	Value	53,639	55,305	57,889
All subject exporters	Value	383,138	427,558	480,927
China	Value	330,065	324,057	377,469
Belgium	Value	91,210	100,818	111,609
Indonesia	Value	3,361	3,602	4,051
Germany	Value	7,462	9,066	8,680
Italy	Value	12,684	14,642	16,609
Belarus	Value	761	1,406	1,792
Hungary	Value	1,920	1,558	1,601
All other exporters	Value	463,520	470,436	538,076
All reporting exporters	Value	846,657	897,994	1,019,003

Table continued.

Table VII-26 Continued
Preserved mushrooms in all container weights: Global exports by exporter and period

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

Exporting country	Measure	2019	2020	2021
United States	Unit value	1.57	1.41	1.28
France	Unit value	1.19	1.23	1.40
Netherlands	Unit value	1.04	0.89	0.96
Poland	Unit value	1.16	1.15	1.10
Spain	Unit value	1.29	2.45	2.18
All subject exporters	Unit value	1.11	1.06	1.08
China	Unit value	0.76	0.79	1.00
Belgium	Unit value	1.11	1.18	1.26
Indonesia	Unit value	0.81	0.85	0.84
Germany	Unit value	1.85	1.85	1.97
Italy	Unit value	3.78	5.16	5.41
Belarus	Unit value	0.57	0.47	0.67
Hungary	Unit value	0.87	0.75	0.63
All other exporters	Unit value	0.85	0.90	1.08
All reporting exporters	Unit value	0.95	0.97	1.08
United States	Share of quantity	0.1	0.1	0.1
France	Share of quantity	1.8	1.4	0.9
Netherlands	Share of quantity	22.2	29.0	31.9
Poland	Share of quantity	10.1	10.7	11.7
Spain	Share of quantity	4.7	2.4	2.8
All subject exporters	Share of quantity	38.7	43.5	47.3
China	Share of quantity	48.7	44.0	39.9
Belgium	Share of quantity	9.2	9.2	9.4
Indonesia	Share of quantity	0.5	0.5	0.5
Germany	Share of quantity	0.5	0.5	0.5
Italy	Share of quantity	0.4	0.3	0.3
Belarus	Share of quantity	0.1	0.3	0.3
Hungary	Share of quantity	0.2	0.2	0.3
All other exporters	Share of quantity	61.3	56.5	52.7
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 2003.10 as reported by various national statistical authorities in the Global Trade Atlas database, accessed October 3, 2022. The exports presented in this table likely include out-of-scope merchandise, as HS subheading 2003.10 includes preserved mushrooms in containers holding more than 255 grams (approximately 9 ounces). In-scope merchandise does not include preserved mushrooms in containers holding greater than 12 ounces (340 grams).

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
87 FR 20460, April 7, 2022	*Certain Preserved Mushrooms From France, Netherlands, Poland, and Spain; Institution of Antidumping Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2022-04-07/pdf/2022-07353.pdf
87 FR 24941, April 27, 2022	*Certain Preserved Mushrooms From France, the Netherlands, Poland, and Spain: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2022-04-27/pdf/2022-08947.pdf
87 FR 30996, May 20, 2022	*Certain Preserved Mushrooms From France, Netherlands, Poland, and Spain Determinations*	https://www.govinfo.gov/content/pkg/FR-2022-05-20/pdf/2022-10824.pdf
87 FR 55997, September 13, 2022	*Certain Preserved Mushrooms From France: Preliminary Affirmative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2022-09-13/pdf/2022-19769.pdf

Citation	Title	Link
87 FR 57717, September 21, 2022	*Certain Preserved Mushrooms From France, Netherlands, Poland, and Spain; Scheduling of the Final Phase of Antidumping Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2022-09-21/pdf/2022-20426.pdf
87 FR 66273, November 3, 2022	*Certain Preserved Mushrooms from Poland: 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-2022-11-03/pdf/2022-23921.pdf
87 FR 66265, November 3, 2022	*Certain Preserved Mushrooms from the Netherlands: 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-2022-11-03/pdf/2022-23922.pdf

Citation	Title	Link
87 FR 66262, November 3, 2022	*Certain Preserved Mushrooms from Spain: 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-2022-11-03/pdf/2022-23923.pdf
87 FR 72963, November 28, 2022	*Certain Preserved Mushrooms From France: Final Affirmative Determination of Sales at Less than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2022-11-28/pdf/2022-25912.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

Subject:	Certain Preserved Mushrooms from France, Netherlands, Poland, and Spain
Inv. Nos.:	731-TA-1587-1590 (Final)
Date and Time:	November 17, 2022 - 9:30 a.m.

EMBASSY APPEARANCE:

European Union Delegation to the United States of America
Washington, DC

Jennifer Danner Riccardi, Senior Trade Advisor

OPENING REMARKS:

In Support of Imposition (**John M. Herrmann**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**Lizbeth R. Levinson**, Fox Rothschild LLP)

In Support of the Imposition of the Antidumping Duty Orders:

Kelley Drye & Warren LLP
Washington, DC
on behalf of

Giorgio Foods, Inc. ("Giorgio")

Brian Loiseau, Senior Vice President of Sales, Research & Development and Business Development, Giorgio

William B. Hudgens, Senior Trade Analyst, Georgetown Economic Services, LLC

Jacob Jones, Data Analyst, Georgetown Economic Services, LLC

John M. Herrmann)
Paul C. Rosenthal)
) – OF COUNSEL
Elizabeth C. Johnson)
Joshua R. Morey)

In Opposition to the Imposition of the
Antidumping Duty Orders:

Akin Gump Strauss Hauer & Feld LLP
Washington, DC
on behalf of

H-E-B Grocery Company LP

Julia K. Eppard) – OF COUNSEL

Fox Rothschild LLP
Washington, DC
on behalf of

Okechamp S.A.; Okechamp B.V.
Prochamp B.V.; Eurochamp S.A.T.

Leszek Ejsmont (remote witness), Chief Executive Officer, Okechamp B.V. (the Netherlands) and Chief Executive Officer, Okechamp S.A. (Poland)

William Purcell, Chairman, Purcell International

Colleen Purcell, President, Purcell International

Lara Gatermann, Vice-President, Wuensche USA, Inc.

Lizbeth R. Levinson)
) – OF COUNSEL
Ronald M. Wisla)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Paul C. Rosenthal**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**Lizbeth R. Levinson**, Fox Rothschild LLP)

-END-

APPENDIX C

SUMMARY DATA

Table C-1

Certain preserved mushrooms: Summary data concerning the U.S. market, by item and period

Quantity=1,000 pounds drained weight; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound drained weight; Productivity=pounds drained weight per hour; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
	2019	2020	2021	2021	2022	2019-21	2019-20	2020-21	2021-22
U.S. consumption quantity:									
Amount	***	***	***	***	***	▲***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▲***	▼***	▲***
Importers' share (fn1):									
France	***	***	***	***	***	▼***	▼***	▼***	▲***
Netherlands, subject	***	***	***	***	***	▲***	▲***	▼***	▼***
Poland	***	***	***	***	***	▲***	▼***	▲***	▲***
Spain	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
Netherlands, nonsubject	***	***	***	***	***	▲***	▼***	▲***	▲***
All other sources	***	***	***	***	***	▼***	▼***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▼***	▲***	▼***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▲***	▼***	▲***
Importers' share (fn1):									
France	***	***	***	***	***	▼***	▼***	▼***	▼***
Netherlands, subject	***	***	***	***	***	▲***	▲***	▼***	▼***
Poland	***	***	***	***	***	▲***	▲***	▲***	▲***
Spain	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources	***	***	***	***	***	▼***	▼***	▲***	▼***
Netherlands, nonsubject	***	***	***	***	***	▲***	▲***	▲***	▲***
All other sources	***	***	***	***	***	▼***	▼***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▼***	▲***	▼***
U.S. importers' U.S. shipments of imports from:									
France:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▼***
Netherlands, subject:									
Quantity	19,480	25,173	21,586	11,941	8,308	▲10.8	▲29.2	▼(14.2)	▼(30.4)
Value	33,861	44,441	41,325	22,936	18,901	▲22.0	▲31.2	▼(7.0)	▼(17.6)
Unit value	$1.74	$1.77	$1.91	$1.92	$2.28	▲10.1	▲1.6	▲8.4	▲18.4
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Poland:									
Quantity	3,306	3,613	5,955	3,099	2,698	▲80.1	▲9.3	▲64.8	▼(12.9)
Value	5,259	6,421	11,320	5,714	5,896	▲115.3	▲22.1	▲76.3	▲3.2
Unit value	$1.59	$1.78	$1.90	$1.84	$2.19	▲19.5	▲11.7	▲7.0	▲18.5
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Spain:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources:									
Quantity	32,487	38,023	33,078	18,165	13,361	▲1.8	▲17.0	▼(13.0)	▼(26.4)
Value	57,639	68,512	64,887	35,210	30,186	▲12.6	▲18.9	▼(5.3)	▼(14.3)
Unit value	$1.77	$1.80	$1.96	$1.94	$2.26	▲10.6	▲1.6	▲8.9	▲16.6
Ending inventory quantity	4,898	2,096	4,514	3,010	5,754	▼(7.8)	▼(57.2)	▲115.4	▲91.2
Netherlands, nonsubject:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources:									
Quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
Value	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	***	▲***

Table continued.

Table C-1 Continued

Certain preserved mushrooms: Summary data concerning the U.S. market, by item and period

Quantity=1,000 pounds drained weight; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound drained weight; Productivity=pounds drained weight per hour; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2019	2020	2021	2021	2022	2019-21	2019-20	2020-21	2021-22
U.S. importers' U.S. shipments of imports from: Continued									
Nonsubject sources:									
Quantity	4,535	4,796	6,780	3,665	4,108	▲49.5	▲5.8	▲41.4	▲12.1
Value	9,086	10,927	14,528	7,866	10,261	▲59.9	▲20.3	▲33.0	▲30.4
Unit value	$2.00	$2.28	$2.14	$2.15	$2.50	▲6.9	▲13.7	▼(6.0)	▲16.4
Ending inventory quantity	2,373	2,362	3,599	3,066	2,425	▲51.7	▼(0.5)	▲52.4	▼(20.9)
All import sources:									
Quantity	37,022	42,819	39,858	21,830	17,469	▲7.7	▲15.7	▼(6.9)	▼(20.0)
Value	66,725	79,439	79,415	43,076	40,447	▲19.0	▲19.1	▼(0.0)	▼(6.1)
Unit value	$1.80	$1.86	$1.99	$1.97	$2.32	▲10.5	▲2.9	▲7.4	▲17.3
Ending inventory quantity	7,271	4,458	8,113	6,076	8,179	▲11.6	▼(38.7)	▲82.0	▲34.6
U.S. producers':									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Production workers	***	***	***	***	***	▲***	▲***	▼***	▼***
Hours worked (1,000s)	***	***	***	***	***	▲***	▲***	▼***	▼***
Wages paid ($1,000)	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▼***	▲***	▲***
Productivity	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit labor costs	***	***	***	***	***	▼***	▼***	▼***	▼***
Net sales:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	***	***	▼***	▲***	▼***	▼***
Gross profit or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
Net income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit COGS	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit net income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▲***
COGS/sales (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Capital expenditures	***	***	***	***	***	▼***	▼***	▼***	▲***
Research and development expenses	***	***	***	***	***	▲***	▲***	***	▼***
Net assets	***	***	***	***	***	▲***	▲***	▼***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

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.--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.

APPENDIX D

IMPORTS AND APPARENT CONSUMPTION USING OFFICIAL IMPORT STATISTICS

(ADJUSTED FOR NETHERLANDS SUBJECT VS. NONSUBJECT)

Table D-1
Certain preserved mushrooms: U.S. imports, by source and period

Quantity in 1,000 pounds drained weight; value in 1,000 dollars; unit values in dollars per pound drained weight

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
France	Quantity	8,122	6,085	3,109	1,411	1,190
Netherlands, subject	Quantity	***	***	***	***	***
Poland	Quantity	3,232	3,307	6,578	3,440	4,008
Spain	Quantity	1,478	1,334	2,682	1,416	2,165
Subject sources	Quantity	***	***	***	***	***
Netherlands, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	2,189	2,030	2,063	1,046	1,383
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	39,232	41,850	50,434	27,954	21,944
France	Value	11,843	8,647	5,307	2,509	2,028
Netherlands, subject	Value	***	***	***	***	***
Poland	Value	4,759	5,120	10,502	5,522	5,985
Spain	Value	2,479	2,241	4,601	2,374	3,768
Subject sources	Value	***	***	***	***	***
Netherlands, nonsubject	Value	***	***	***	***	***
All other sources	Value	2,921	2,407	2,665	1,197	1,870
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	58,169	62,731	73,757	40,568	35,385
France	Unit value	1.46	1.42	1.71	1.78	1.70
Netherlands, subject	Unit value	***	***	***	***	***
Poland	Unit value	1.47	1.55	1.60	1.61	1.49
Spain	Unit value	1.68	1.68	1.72	1.68	1.74
Subject sources	Unit value	***	***	***	***	***
Netherlands, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	1.33	1.19	1.29	1.15	1.35
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	1.48	1.50	1.46	1.45	1.61

Table continued.

Table D-1 Continued
Certain preserved mushrooms: U.S. imports, by source and period

Shares and ratios in percent; ratios represent the ratio to U.S. production

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
France	Share of quantity	20.7	14.5	6.2	5.0	5.4
Netherlands, subject	Share of quantity	***	***	***	***	***
Poland	Share of quantity	8.2	7.9	13.0	12.3	18.3
Spain	Share of quantity	3.8	3.2	5.3	5.1	9.9
Subject sources	Share of quantity	***	***	***	***	***
Netherlands, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	5.6	4.8	4.1	3.7	6.3
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
France	Share of value	20.4	13.8	7.2	6.2	5.7
Netherlands, subject	Share of value	***	***	***	***	***
Poland	Share of value	8.2	8.2	14.2	13.6	16.9
Spain	Share of value	4.3	3.6	6.2	5.9	10.6
Subject sources	Share of value	***	***	***	***	***
Netherlands, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	5.0	3.8	3.6	3.0	5.3
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
France	Ratio	***	***	***	***	***
Netherlands, subject	Ratio	***	***	***	***	***
Poland	Ratio	***	***	***	***	***
Spain	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Netherlands, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Table continued.

Table D-1 Continued
Certain preserved mushrooms: U.S. imports, by source and period

Δ in percent

Source	Measure	2019-21	2019-20	2020-21	Q2 2021 -Q2 22
France	%Δ Quantity	▼(61.7)	▼(25.1)	▼(48.9)	▼(15.7)
Netherlands, subject	%Δ Quantity	▲***	▲***	▲***	▼***
Poland	%Δ Quantity	▲103.5	▲2.3	▲98.9	▲16.5
Spain	%Δ Quantity	▲81.5	▼(9.7)	▲101.1	▲52.9
Subject sources	%Δ Quantity	▲***	▲***	▲***	▼***
Netherlands, nonsubject	%Δ Quantity	▲***	▲***	▲***	▼***
All other sources	%Δ Quantity	▼(5.8)	▼(7.3)	▲1.7	▲32.3
Nonsubject sources	%Δ Quantity	▲***	▼***	▲***	▼***
All import sources	%Δ Quantity	▲28.6	▲6.7	▲20.5	▼(21.5)
France	%Δ Value	▼(55.2)	▼(27.0)	▼(38.6)	▼(19.2)
Netherlands, subject	%Δ Value	▲***	▲***	▲***	▼***
Poland	%Δ Value	▲120.7	▲7.6	▲105.1	▲8.4
Spain	%Δ Value	▲85.6	▼(9.6)	▲105.4	▲58.7
Subject sources	%Δ Value	▲***	▲***	▲***	▼***
Netherlands, nonsubject	%Δ Value	▲***	▲***	▲***	▼***
All other sources	%Δ Value	▼(8.8)	▼(17.6)	▲10.7	▲56.2
Nonsubject sources	%Δ Value	▲***	▼***	▲***	▼***
All import sources	%Δ Value	▲26.8	▲7.8	▲17.6	▼(12.8)
France	%Δ Unit value	▲17.1	▼(2.5)	▲20.1	▼(4.2)
Netherlands, subject	%Δ Unit value	▼***	▲***	▼***	▲***
Poland	%Δ Unit value	▲8.4	▲5.1	▲3.1	▼(7.0)
Spain	%Δ Unit value	▲2.3	▲0.1	▲2.1	▲3.8
Subject sources	%Δ Unit value	▼***	▲***	▼***	▲***
Netherlands, nonsubject	%Δ Unit value	▲***	▲***	▲***	▲***
All other sources	%Δ Unit value	▼(3.2)	▼(11.1)	▲8.9	▲18.1
Nonsubject sources	%Δ Unit value	▲***	▲***	▲***	▲***
All import sources	%Δ Unit value	▼(1.4)	▲1.1	▼(2.4)	▲11.1

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 accessed on October 12, 2022. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Figure D-1
Certain preserved mushrooms: U.S. import quantities and average unit values, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 accessed on October 12, 2022. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Table D-2
Certain preserved mushrooms: Apparent U.S. consumption and market shares based on quantity data, by source and period

Quantity in 1,000 pounds drained weight, shares in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Quantity	***	***	***	***	***
France	Quantity	8,122	6,085	3,109	1,411	1,190
Netherlands, subject	Quantity	***	***	***	***	***
Poland	Quantity	3,232	3,307	6,578	3,440	4,008
Spain	Quantity	1,478	1,334	2,682	1,416	2,165
Subject sources	Quantity	***	***	***	***	***
Netherlands, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	2,189	2,030	2,063	1,046	1,383
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	39,232	41,850	50,434	27,954	21,944
All sources	Quantity	***	***	***	***	***
U.S. producer	Share	***	***	***	***	***
France	Share	***	***	***	***	***
Netherlands, subject	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Spain	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Netherlands, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137, accessed on October 12, 2022. Imports are based on the imports for consumption data series.

Figure D-2
Certain preserved mushrooms: Apparent U.S. consumption based on quantity data, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137, accessed on October 12, 2022. Imports are based on the imports for consumption data series.

Table D-3
Certain preserved mushrooms: Apparent U.S. consumption and market shares based on value data, by source and period

Value in 1,000 dollars, shares in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producer	Value	***	***	***	***	***
France	Value	11,843	8,647	5,307	2,509	2,028
Netherlands, subject	Value	***	***	***	***	***
Poland	Value	4,759	5,120	10,502	5,522	5,985
Spain	Value	2,479	2,241	4,601	2,374	3,768
Subject sources	Value	***	***	***	***	***
Netherlands, nonsubject	Value	***	***	***	***	***
All other sources	Value	2,921	2,407	2,665	1,197	1,870
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	58,169	62,731	73,757	40,568	35,385
All sources	Value	***	***	***	***	***
U.S. producer	Share	***	***	***	***	***
France	Share	***	***	***	***	***
Netherlands, subject	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Spain	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Netherlands, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 accessed on October 12, 2022. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Figure D-3
Certain preserved mushrooms: Apparent U.S. consumption based on value data, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 2003.10.0127, 2003.10.0131, and 2003.10.0137 accessed on October 12, 2022. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

APPENDIX E

PRICE DATA FOR PROCHAMP'S NONSUBJECT PRODUCT FROM THE NETHERLANDS

On November 3, 2022, the Department of Commerce preliminarily determined that imports of certain preserved mushrooms from Dutch producer Prochamp have an estimated dumping margin of 0.0 percent. (See Part I.) Among importers of certain preserved mushrooms from the Netherlands, *** provided pricing data reflecting imports of certain preserved mushrooms produced by Prochamp.

Tables E-1 to E-3 present pricing data for nonsubject imports from the Netherlands. As shown in table E-4, a majority of nonsubject pricing products from the Netherlands were priced higher than subject pricing products from the Netherlands, but lower than pricing products from all other sources.

Table E-1
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight.

Period	US price	US quantity	Netherlands, nonsubject price	Netherlands, nonsubject quantity
2019 Q1	***	***	***	***
2019 Q2	***	***	***	***
2019 Q3	***	***	***	***
2019 Q4	***	***	***	***
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***

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

Note: Product 1: Stems and pieces, in 4 ounce cans (excluding organic mushrooms).

Table E-2
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight;

Period	US price	US quantity	Netherlands, nonsubject price	Netherlands, nonsubject quantity
2019 Q1	***	***	***	***
2019 Q2	***	***	***	***
2019 Q3	***	***	***	***
2019 Q4	***	***	***	***
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***

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. Quantity shown as "0" represent values greater than zero but greater than 500 pounds drained weight. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Note: Product 2: Stems and pieces, in 8 ounce cans (excluding organic mushrooms).

Table E-3
Certain preserved mushrooms: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter, January 2019–June 2022

Quantity in 1,000 pounds drained weight; Prices in dollars per pound drained weight;

Period	US price	US quantity	Netherlands, nonsubject price	Netherlands, nonsubject quantity
2019 Q1	***	***	***	***
2019 Q2	***	***	***	***
2019 Q3	***	***	***	***
2019 Q4	***	***	***	***
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***

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. Quantity shown as "0" represent values greater than zero but greater than 500 pounds drained weight. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Note: Product 3: Whole sliced mushrooms, in 4 ounce cans (excluding organic mushrooms).

Table E-4
Certain preserved mushrooms: Summary of higher/(lower) unit values, by source, January 2019-June 2022

Comparison source	Benchmark source	Number of quarters lower	Quantity lower	Number of quarters higher	Quantity higher
Netherlands, nonsubject	United States	***	***	***	***
Netherlands, nonsubject	France	***	***	***	***
Netherlands, nonsubject	Netherlands, subject	***	***	***	***
Netherlands, nonsubject	Poland	***	***	***	***
Netherlands, nonsubject	Spain	***	***	***	***

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

APPENDIX F

PRELIMINARY QUESTIONNAIRE DATA FOR FRENCH PRODUCER

Table F-1
Certain preserved mushrooms: Summary data for producer in France, 2021

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

Firm	Production (1,000 pounds drained weight)	Share of reported production (percent)	Exports to the United States (1,000 pounds drained weight)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds drained weight)	Share of firm's total shipments exported to the United States (percent)
Bonduelle Europe	***	100.0	***	100.0	***	***

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

Table F-2
Certain preserved mushrooms: Reported changes in operations in France since January 1, 2019, by firm

Item	Firm name and accompanying narrative response
Acquisitions	***

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

Table F-3
Certain preserved mushrooms: Data on industry in France, by period

Quantity in 1,000 pounds drained weight

Item	2019	2020	2021	Projection 2022	Projection 2023
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
Resales exported to the United States	***	***	***	***	***
Total exports to the United States	***	***	***	***	***

Table continued.

Table F-3 continued
Certain preserved mushrooms: Data on industry in France, by period

Ratio and share in percent

Item	2019	2020	2021	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***
Exports by producer's share of total exports to the United States	***	***	***	***	***
Exports by resellers' share of total exports to the United States	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: ***. Bonduelle Europe's preliminary phase foreign producer questionnaire, questions II-2a and II-9, and email from ***, April 26, 2022.

Table F-4
Certain preserved mushrooms: Producer in France overall capacity and production on the same equipment as subject production, by period

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

Item	Measure	2019	2020	2021
Overall capacity	Quantity	***	***	***
Preserved mushrooms production	Quantity	***	***	***
Other production	Quantity	***	***	***
Total production	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
Preserved mushrooms production	Share	***	***	***
Other production	Share	***	***	***
Total production	Share	***	***	***

Source: Compiled from data submitted in response to Commission preliminary phase questionnaires

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

APPENDIX G

PROCHAMP'S NONSUBJECT NETHERLANDS INDUSTRY DATA

Table G-1
Certain preserved mushrooms: Prochamp's nonsubject Netherlands industry data, by period

Quantity in 1,000 pounds drained weight

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table G-1 continued
Certain preserved mushrooms: Prochamp's nonsubject Netherlands industry data, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".