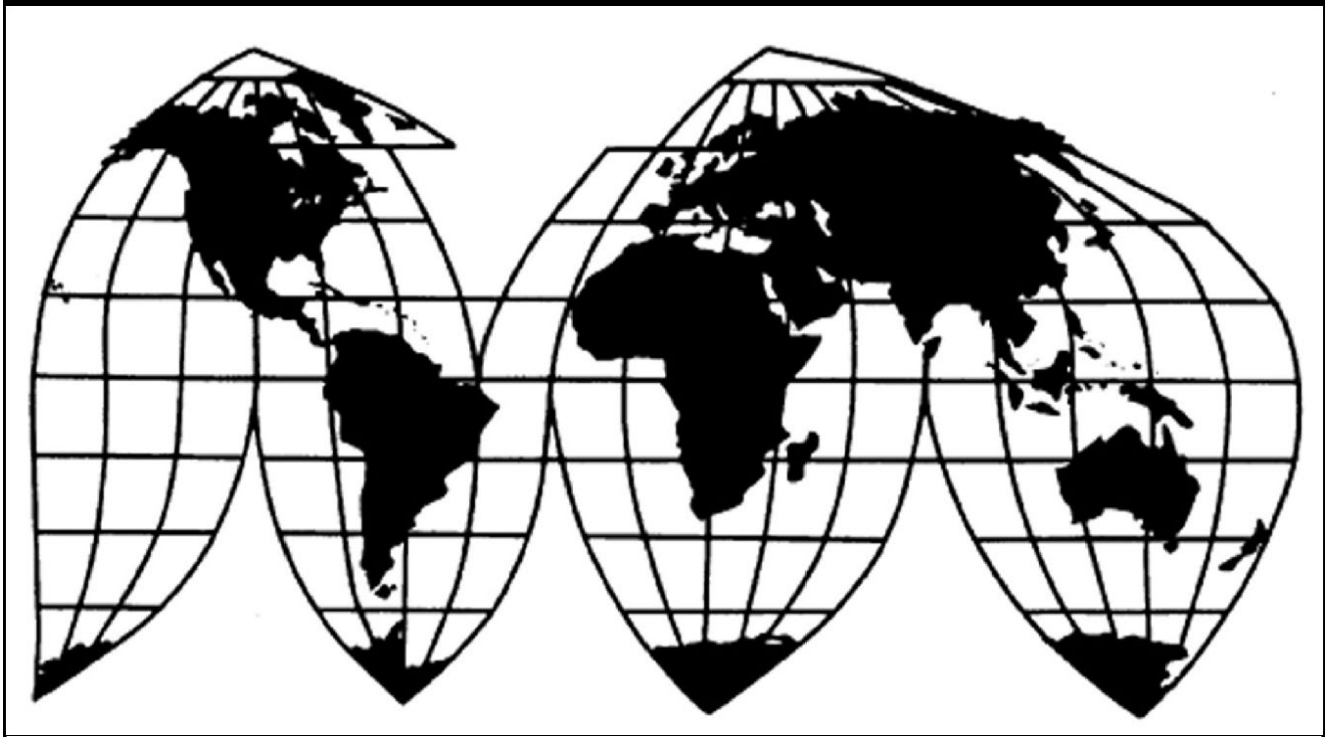
Calcium Hypochlorite from China

Investigation Nos. 701-TA-510 and 731-TA-1245
(Second Review)

Publication 5701 **February 2026**

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-510 and 731-TA-1245 (Second Review)

Calcium Hypochlorite from China

DETERMINATIONS

On the basis of the record[1] developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing and antidumping duty orders on calcium hypochlorite from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on June 2, 2025 (90 FR 23361) and determined on September 5, 2025 that it would conduct expedited reviews (90 FR 57098, December 9, 2025).[2]

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

[2] Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding.

Views of the Commission

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

I. Background

Original Investigations. In December 2013, Arch Chemicals, Inc. ("Arch"), a domestic calhypo producer, filed antidumping and countervailing duty petitions concerning imports of calhypo from China.[1] In January 2015, the Commission determined that an industry in the United States was materially injured by reason of dumped and subsidized imports of calhypo from China,[2] and the Department of Commerce ("Commerce") subsequently issued antidumping and countervailing duty orders on those imports.[3]

First Reviews. In December 2019, the Commission instituted its first five-year reviews of the orders.[4] After conducting expedited reviews, the Commission determined that revocation of the orders would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[5] In July 2020, Commerce issued a continuation of the orders.[6]

Current Reviews. On June 2, 2025, the Commission instituted these second five-year reviews.[7] Innovative Water Care, LLC ("IWC"), a domestic calhypo producer, responded to the

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[1] Confidential Report, Memorandum INV-XX-111, EDIS Doc. 860350 (Aug. 25, 2025) ("CR") at 1.2; Public Report, *Calcium Hypochlorite from China*, Inv. Nos. 701-TA-510 and 731-TA-1245 (Second Review), USITC Pub. 5701 (Feb. 2025) ("PR") at 1.2.

[2] *Calcium Hypochlorite from China*, Inv. Nos. 731-TA-510 and 731-TA-1245 (Final), USITC Pub. 4515 at 3 (Jan. 2015) ("*Original Determinations*").

[3] *Calcium Hypochlorite from the People's Republic of China: Antidumping Duty Order*, 80 Fed. Reg. 5085 (Jan. 30, 2015); *Calcium Hypochlorite from the People's Republic of China: Countervailing Duty Order*, 80 Fed. Reg. 5082 (Jan. 30, 2015).

[4] *Calcium Hypochlorite from China: Institution of Five-Year Reviews*, 84 Fed. Reg. 66002 (Dec. 2, 2019).

[5] *Calcium Hypochlorite from China*, Inv. Nos. 731-TA-510 and 731-TA-1245 (Review), USITC Pub. 5065 at 3 (Jan. 2020) ("*First Review Determinations*").

[6] *Calcium Hypochlorite from the People's Republic of China: Continuation of Antidumping Duty Order and Countervailing Duty Order*, 85 Fed. Reg. 39522 (July 1, 2020).

[7] *Calcium Hypochlorite from China; Institution of Five-Year Reviews*, 90 Fed. Reg. 23361 (Jun. 2, 2025).

Commission's notice of institution.[8] No respondent interested party responded. On September 5, 2025, the Commission determined that the domestic interested party group response to the notice of institution was adequate and that the respondent interested party group response was inadequate.[9] Finding no other circumstances warranting full reviews, the Commission determined to conduct expedited reviews of the orders.[10] On January 15, 2026, IWC submitted comments pursuant to 19 C.F.R. § 207.62(d) regarding the determinations the Commission should reach in these expedited reviews.[11]

U.S. industry data in these reviews are based on information provided in response to the notice of institution by IWC, which accounted for an estimated *** percent of domestic calhypo production in 2024.[12] U.S. import data are based on official Commerce import statistics.[13] Foreign industry data and related information are based on information from the original investigations and first reviews, information submitted by IWC in the current reviews, and publicly available information gathered by the Commission.[14] Additionally, three U.S. purchasers of calhypo, ***, responded to the Commission's adequacy phase purchaser questionnaire.[15]

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."[16] The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and

[8] IWC's Response to Notice of Institution, EDIS Doc. 855871 (Jul. 2, 2025) ("IWC's Response to Notice of Institution").

[9] Explanation of Commission Determination on Adequacy, EDIS Doc. No. 858626 (Sept. 19, 2025).

[10] *Calcium Hypochlorite from China; Scheduling of Expedited Five-Year Reviews*, 90 Fed. Reg. 57098 (Dec. 5, 2025). Due to the lapse in appropriations and ensuing cessation of Commission operations, the deadlines in these reviews were tolled. *Id*. at n.2.

[11] IWC's Final Comments, EDIS Doc. 869123 (Jan. 15, 2026) ("IWC's Final Comments").

[12] CR/PR at 1.10; IWC's Response to Notice of Institution at Exh. 1. IWC reports that it is one of two domestic producers of calhypo. *Id.* at 14.

[13] Specifically, these import data are compiled from official Commerce import statistics for Harmonized Tariff Schedule ("HTS") statistical reporting number 2828.10.0000. CR/PR at Table 1.5 note.

[14] CR/PR at 1.16-1.17; IWC's Response to Notice of Institution at Exh. 1.

[15] CR/PR at D.3.

[16] 19 U.S.C. § 1677(4)(A).

uses with, the article subject to an investigation under this subtitle."[17] The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.[18]

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

> Calcium hypochlorite, regardless of form (*e.g.*, powder, tablet (compressed), crystalline (granular), or in liquid solution), whether or not blended with other materials, containing at least 10 percent available chlorine measured by actual weight. The scope also includes bleaching powder and hemibasic calcium hypochlorite.
>
> Calcium hypochlorite has the general chemical formulation $Ca(OCl)_2$, but may also be sold in a more dilute form as bleaching powder with the chemical formulation, $Ca(OCl)_2.CaCl_2.Ca(OH)_2.2H_2O$ or hemibasic calcium hypochlorite with the chemical formula of $2Ca(OCl)_2.Ca(OH)_2$ or $Ca(OCl)_2.0.5Ca(OH)_2$. Calcium hypochlorite has a Chemical Abstract Service (CAS) registry number of 7778-54-3, and a U.S. Environmental Protection Agency (EPA) Pesticide Code (PC) Number of 014701. The subject calcium hypochlorite has an International Maritime Dangerous Goods (IMDG) code of Class 5.1 UN 1748, 2880, or 2208 or Class 5.1/8 UN 3485, 3486, or 3487.
>
> Calcium hypochlorite is currently classifiable under the subheading 2828.10.0000 of the Harmonized Tariff Schedule of the United States (HTSUS). The subheading covers commercial calcium hypochlorite and other calcium hypochlorite. When tableted or blended with other materials, calcium hypochlorite may be entered under other tariff classifications, such as 3808.94.5000 and 3808.99.9500, which cover disinfectants and similar products. While the HTSUS subheadings, the CAS registry number, the U.S. EPA PC number, and the IMDG codes are

[17] 19 U.S.C. § 1677(10); *see*, *e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

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

> provided for convenience and customs purposes, the written description of the scope of this Order is dispositive.[19]

Calhypo is a chemical compound used primarily to sanitize swimming pools, spas, and municipal water treatment systems. It is typically sold as a white solid in powder, crystalline, or tablet form. The active ingredient is chlorine, which acts as a biocide, killing algae and other microbes. Calhypo can be sold as a pure product, with available chlorine concentrations of 65-80 percent, or as a blended product, with available chlorine concentrations of 45-60 percent. Blended products typically include algaecides and/or flocculants to clarify water.[20]

In the original investigations and first reviews, the Commission defined a single domestic like product consisting of calhypo, coextensive with Commerce's scope.[21] IWC agrees with the domestic like product definition from the prior proceedings.[22] No information on the record of these reviews indicates that the pertinent characteristics and uses of domestically produced calhypo have changed since the prior proceedings so as to warrant revisiting the domestic like product definition.[23] Consequently, we again define a single domestic like product consisting of calhypo, coextensive with Commerce's scope.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[24] 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.

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[19] *Calcium Hypochlorite from the People's Republic of China: Final Results of the Second Expedited Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 48047 (Oct. 3, 2025) and accompanying Issues and Decision Memorandum, EDIS Doc. 869118 at 2 (Sept. 26, 2025) ("AD I&D Memo"); *Calcium Hypochlorite from the People's Republic of China: Final Results of the Second Expedited Sunset Review of the Countervailing Duty Order*, 90 Fed. Reg. 51652 (Nov. 18, 2025) and accompanying Issues and Decision Memorandum, EDIS Doc. 869118 at 2 (Sept. 30, 2025) ("CVD I&D Memo").

[20] CR/PR at 1.7.

[21] *Original Determinations*, USITC Pub. 4515 at 6; *First Review Determinations*, USITC Pub. 5065 at 6.

[22] IWC's Response to Notice of Institution at 15.

[23] *See generally* CR/PR at 1.7-1.9.

[24] 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

In the original investigations, the Commission assessed whether tableters – firms that solely convert calhypo from granular/powder form into tablet form – engaged in sufficient production-related activities to qualify as domestic producers of calhpyo. The Commission found that tableters did not engage in sufficient production-related activities to qualify as domestic producers of calhypo, based on an analysis of its traditional factors,[25] and therefore determined that they should not be included in the definition of the domestic industry.[26] Noting that there were no related party issues, the Commission then defined the domestic industry to include all domestic producers of calhypo.[27]

In the first reviews, the domestic interested parties agreed with the domestic industry definition from the original investigations, and there were no related party issues or any information indicating that revisiting the domestic industry definition would be warranted. Consequently, the Commission again defined the domestic industry to include all domestic producers of calhypo.[28]

Likewise, in these second reviews, IWC agrees with the domestic industry definition from the prior proceedings, and there are no related party issues or any information indicating that revisiting the domestic industry definition would be warranted.[29] We again define the domestic industry to include all domestic producers of calhypo.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely

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[25] As the Commission noted with respect to these factors, the capital investments necessary for tableting were relatively modest and far less than those necessary to produce granular/powder calhypo; the value added by tableting was relatively small; and the levels of technical expertise and employment involved in tableting were considerably lower than those involved in the production of granular/powder calhypo. *Original Determinations*, USITC Pub. 4515 at 6-8.

[26] *Original Determinations*, USITC Pub. 4515 at 8.

[27] *Original Determinations*, USITC Pub. 4515 at 9.

[28] *First Review Determinations*, USITC Pub. 5065 at 7.

[29] IWC's Response to Notice of Institution at 15 and Exh. 1.

to lead to continuation or recurrence of material injury within a reasonably foreseeable time."[30] The SAA states that "under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."[31] Thus, the likelihood standard is prospective in nature.[32] The U.S. Court of International Trade has found that "likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.[33]

The statute states that "the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time."[34] According to the SAA, a "'reasonably foreseeable time' will vary from case-to-case, but normally will exceed the 'imminent' timeframe applicable in a threat of injury analysis in original investigations."[35]

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[30] 19 U.S.C. § 1675a(a).

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

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

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

[34] 19 U.S.C. § 1675a(a)(5).

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

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated."[36] It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).[37] The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.[38]

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.[39] In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.[40]

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the

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[36] 19 U.S.C. § 1675a(a)(1).

[37] 19 U.S.C. § 1675a(a)(1). Commerce has made no duty absorption findings. *See* AD I&D Memo at 3.

[38] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[39] 19 U.S.C. § 1675a(a)(2).

[40] 19 U.S.C. § 1675a(a)(2)(A-D).

United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.[41]

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.[42] All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.[43]

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the calhypo industry in China. There also is limited information on the calhypo market in the United States during the 2019-2024 period of review ("POR"). Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations and first reviews, and the limited new information on the record in these second five-year reviews.

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

[42] 19 U.S.C. § 1675a(a)(4).

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

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[44] The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. In the original investigations, the Commission found that demand for calhypo – a product used primarily to chlorinate swimming pool water – was seasonal, reflecting the seasonality of swimming pool usage. It also found that calhypo demand could be negatively affected by adverse weather conditions during swimming pool season.[45] Apparent U.S. consumption of calhypo was relatively steady during the period of investigation ("POI").[46]

First Reviews. In the first reviews, the Commission found that demand for calhypo remained seasonal and influenced by weather conditions. It also found that apparent U.S. consumption in 2018 was lower than apparent U.S. consumption in any full year of the POI.[47]

Current Reviews. Demand for calhypo remains seasonal and influenced by weather conditions.[48] Purchaser *** indicated that calhypo demand ***. Purchaser *** indicated that calhypo demand ***. Purchaser *** reported that there have been ***.[49]

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[44] 19 U.S.C. § 1675a(a)(4).

[45] *Original Determinations*, USITC Pub. 4515 at 13.

[46] Apparent U.S. consumption increased irregularly by *** percent over the full years of the POI, from *** pounds in 2011 to *** pounds in 2013. Apparent U.S. consumption was *** percent lower in January-June 2014 ("interim 2014"), at *** pounds, than in January-June 2013 ("interim 2013"), at *** pounds. Confidential Original Determinations, EDIS Doc. 858632 at 18-19.

[47] *First Review Determinations*, USITC Pub. 5065 at 11 & n.42.

[48] IWC's Response to Notice of Institution at 15.

[49] CR/PR at D.3.

Apparent U.S consumption of calhypo was *** pounds in 2024, lower than in any full year of the POI.[50] However, we note that the lower apparent U.S. consumption in 2024 relative to the level during the POI may be explained by the lower level of U.S. shipment coverage for the POR than the POI.[51]

2. Supply Conditions

Original Investigations. In the original investigations, the domestic industry was the largest source of supply to the U.S. market during the POI.[52] Its market share decreased from 2011 to 2013, but was higher in interim 2014 than in interim 2013.[53] The Commission noted that the domestic industry was concentrated, comprising just two firms – Arch and Axiall Corp. ("Axiall").[54]

Subject imports were the second largest source of supply to the U.S. market during the POI.[55] Their market share increased from 2011 to 2013, but was lower in interim 2014 than in interim 2013.[56] Nonsubject imports were the smallest source of supply to the U.S. market during the POI,[57] and their market share remained negligible throughout the period.[58]

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[50] *Compare* CR/PR at Table 1.6 *with* Confidential Original Determinations, EDIS Doc. 858632 at 18-19.

[51] In the original investigations, the Commission received responses to its U.S. producer questionnaire from both U.S. producers of calhypo. CR/PR at 1.10. Thus, the Commission had complete coverage of the U.S. industry's production and U.S. shipments for the POI. In these reviews, the Commission received a response to its notice of institution from only one of the two U.S. producers of calhypo. *Id*. Thus, the Commission has only partial coverage of the domestic industry's U.S. shipments for the POR.

[52] *Original Determinations*, USITC Pub. 4515 at 13.

[53] Specifically, the domestic industry's share of the U.S. market decreased from *** percent in both 2011 and 2012 to *** percent in 2013. Its share was *** percent in interim 2013 and higher, at *** percent, in interim 2014. CR/PR at Table C-1.

[54] *Original Determinations*, USITC Pub. 4515 at 14.

[55] *Original Determinations*, USITC Pub. 4515 at 14.

[56] Specifically, subject imports' share of the U.S. market increased from *** percent in 2011 to *** percent in 2012 and *** percent in 2013. Their share was *** percent in interim 2013 and lower, at *** percent, in interim 2014. CR/PR at Table C-1.

[57] *Original Determinations*, USITC Pub. 4515 at 14.

[58] Specifically, nonsubject imports' share of the U.S. market was *** percent in 2011, *** percent in 2012 and *** percent in 2013. Their share was *** percent in interim 2013 and *** percent in interim 2014. CR/PR at Table C-1.

First Reviews. In the first reviews, the domestic industry remained the largest source of supply to the U.S. market in 2018, with a market share of *** percent.[59] The Commission noted that the domestic industry remained concentrated, comprising just two firms – IWC and Westlake Chemical Company ("Westlake") – with the former having acquired Arch and the latter having acquired Axiall.[60]

Nonsubject imports were the second largest source of supply to the U.S. market in 2018, accounting for the remaining *** percent of the market not supplied by the domestic industry that year.[61] The Commission observed that there had been no subject imports since 2015.[62]

Current Reviews. In the current reviews, the domestic industry continued to remain the largest source of supply to the U.S. market in 2024, with a market share of *** percent.[63] The domestic industry also continued to remain concentrated in 2024, continuing to be composed of just IWC and Westlake.[64] No interested party reported any major developments in the domestic industry since the first reviews, and the Commission has identified none.[65]

Nonsubject imports were the second largest source of supply to the U.S. market in 2024, accounting for the remaining *** percent of the market not supplied by the domestic industry that year.[66] The largest source of nonsubject imports in 2024 was India.[67] There were no subject imports during the POR.[68]

3. Substitutability and Other Conditions

Original Investigations. In the original investigations, the Commission found that there was a high degree of substitutability between domestically produced calhypo and the subject imports, and that price, quality, and availability were important factors in calhypo purchasing

[59] *First Review Determinations*, USITC Pub. 5065 at 12; Confidential First Review Determinations, EDIS Doc. 858633 at 15.

[60] *First Review Determinations*, USITC Pub. 5065 at 12 and n.45.

[61] *First Review Determinations*, USITC Pub. 5065 at 12; Confidential First Review Determinations, EDIS Doc. 858633 at 15.

[62] *First Review Determinations*, USITC Pub. 5065 at 12.

[63] CR/PR at Table 1.6.

[64] IWC's Response to Notice of Institution at 14.

[65] CR/PR at 1.10.

[66] CR/PR at Table 1.6.

[67] CR/PR at Table 1.5.

[68] CR/PR at Table 1.5.

decisions.[69] The Commission also noted that calhypo raw material costs, as well as other calhypo input costs, had generally increased over the POI.[70]

First Reviews. In the first reviews, the Commission found no information indicating that the degree of substitutability between domestically produced calhypo and subject calhypo, or the factors influencing calhypo purchasing decisions, had changed since the original investigations. Consequently, it continued to find that there was a high degree of substitutability between domestically produced and subject imported calhypo, and that price, quality, and availability were important factors in calhypo purchasing decisions.[71] The Commission also noted that calhypo originating in China had become subject to an additional 25 percent tariff under Section 301 of the Trade Act of 1974 ("Section 301") in May 2019.[72]

Current Reviews. The record in these reviews contains no information indicating that the degree of substitutability between domestically produced and subject calhypo, or the factors influencing calhypo purchasing decisions, have changed since the prior proceedings. Consequently, we again find that there is a high degree of substitutability between domestically produced and subject imported calhypo, and that price, quality, and availability are important factors in calhypo purchasing decisions.[73]

As the Commission noted in the first reviews, effective in May 2019, calhypo originating in China became subject to an additional 25 percent tariff under Section 301.[74] Effective February 4, 2025, calhypo originating in China also became subject to an additional 10 percent tariff under the International Emergency Economic Powers Act ("IEEPA"), which increased to 20 percent on March 4, 2025, and reverted to 10 percent on November 10, 2025.[75] Effective April 5, 2025, calhypo originating in China also became subject to a further additional 10 percent

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[69] *Original Determinations*, USITC Pub. 4515 at 14-16.

[70] *Original Determinations*, USITC Pub. 4515 at 15. The Commission found that the principal raw materials for calhypo were chlorine and lime, with electricity being another major production input. Over the POI, the prices for both lime and industrial electricity increased by approximately 11.0 percent. *Id*. at n.83.

[71] *First Review Determinations*, USITC Pub. 5065 at 12.

[72] *First Review Determinations*, USITC Pub. 5065 at 13.

[73] The limited record of these reviews contains no data concerning IWC's raw material and other input costs during the POR.

[74] CR/PR at 1.6.

[75] CR/PR at 1.6; Executive Order 14357, *Modifying Duties Addressing the Synthetic Opioid Supply Chain in the People's Republic of China*, 90 Fed. Reg. 50725 (Nov. 7, 2025).

tariff under IEEPA – separate from the additional IEEPA tariff initiated in February 2025 – which increased to 125 percent on April 10, 2025, and reverted to 10 percent on May 14, 2025.[76]

C. Likely Volume of Subject Imports

Original Investigations. In the original investigations, the Commission found that the volume of subject imports was significant in both absolute terms and relative to consumption in the United States.[77] The Commission also noted that subject imports had increased their market share during the POI at the domestic industry's expense.[78]

First Reviews. In the first reviews, the Commission found that subject imports maintained only a limited presence in the U.S. market during the POR, with such imports ceasing completely after 2015 due to the disciplining effect of the orders.[79] The Commission further found that, should these orders be revoked, the volume of subject imports would likely again be significant, given the size and export orientation of the calhypo industry in China and the attractiveness of the U.S. market.[80]

Current Reviews. In the current reviews, there were no subject imports during the POR, likely reflecting at least in part the continued disciplining effect of the orders.[81] The record indicates that, should these orders be revoked, subject producers in China would have both the ability and incentive to export significant volumes of calhypo to the United States. Although

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[76] CR/PR at 1.6 and n.20. Additional duties under IEEPA are the subject of ongoing litigation. *V.O.S. Selections, Inc. v. Trump*, 149 F.4th 1312 (Fed. Cir.), *cert. granted*, 146 S. Ct. 73, 222 L. Ed. 2d 1231 (2025).

[77] *Original Determinations*, USITC Pub. 4515 at 16. Three of six Commissioners also found that the increase in the volume of subject imports was significant both in absolute terms and relative to consumption in the United States. *Id*. at 16 n.94.

In absolute terms, subject imports increased from *** pounds in 2011 to *** pounds in 2013, but were lower in interim 2014, at *** pounds, than in interim 2013, at *** pounds. As a share of apparent U.S. consumption, subject imports increased from *** percent in 2011 to *** percent in 2013, but their share was lower in interim 2014, at *** percent, than in interim 2013, at *** percent. Confidential Original Determinations, EDIS Doc. 858632 at 21-22. The Commission found that declines in subject import volume and market share in interim 2014 relative to interim 2013 were largely the result of the filing of the petitions and the pendency of the investigations and thus accorded reduced weight to the interim 2014 volume data. *Id.* at 22.

[78] Specifically, over the full years of the POI, as subject imports gained *** percentage points of share, the domestic industry lost 1.9 percentage points of share. Confidential Original Determinations, EDIS Doc. 858632 at 22.

[79] *First Review Determinations*, USITC Pub. 5065 at 13. In 2014 and 2015, subject import volume was 4.1 million pounds and 29,000 pounds, respectively. *Id*.

[80] *First Review Determinations*, USITC Pub. 5065 at 13-15.

[81] CR/PR at Table 1.5.

there is limited information in the record concerning the subject industry,[82] IWC has identified four possible producers of calhypo in China,[83] and has submitted information indicating that these producers possess substantial capacity[84] and are highly export oriented.[85] Consistent with the data from IWC indicating that the subject industry in China is export oriented, data from Global Trade Atlas ("GTA") show that China was by far the world's largest calhypo exporter throughout the POR, exporting more than twice as much calhypo as the next leading country source (India) in each year of the period.[86] Moreover, the GTA data indicate that the subject industry's share of global exports has increased, as its calhypo exports increased by 31.1 percent over the POR, from 201.1 million pounds in 2019 to 263.6 million pounds in 2024, as the total export quantity from all countries declined from 439.0 million pounds to 429.3 million pounds over the same period.[87]

The record also indicates that the U.S. market remains attractive to subject producers. The United States is one of the world's largest consumers of calhypo.[88] Moreover, IWC maintains that calhypo from China can command *** in the United States than in other markets.[89]

Given the foregoing, including the subject imports' significant volume and market share during the original investigations, the subject industry's capacity and export orientation, and the U.S. market's attractiveness, we find that the volume of subject imports would likely be significant, in both absolute terms and relative to consumption in the United States, if the orders were revoked.[90]

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[82] The Commission expedited these reviews and the prior reviews, and it did not receive any responses to its foreign producer questionnaire in the original investigations. *Original Determinations,* USITC Pub. 4515, at VII-3.

[83] IWC's Response to Notice of Institution at Exh. 7; CR/PR at 1.16.

[84] IWC's Response to Notice of Institution at Exh. 4 (collating information from <made-in-china.com> indicating that the subject industry has an annual capacity of 52.4 million metric tons).

[85] IWC's Response to Notice of Institution at Exh. 5 (collating export statistics from Trade Data Monitor for calhypo from China).

[86] CR/PR at Table 1.6 (collating export data from GTA for HS subheading 2828.10 covering commercial calhypo and other calhypo).

[87] CR/PR at Table 1.6.

[88] *See* Chemical Economics Handbook, *Hypochlorite Bleaches*, EDIS Doc. 858655 at Table 1.

[89] IWC's Final Comments at 7.

[90] Although subject imports from China are subject to additional duties under Section 301, given the Chinese industry's large capacity and exports, as well as the attractiveness of the U.S. market, we find that these additional duties would not likely prevent subject imports from China from increasing to significant levels if the order were revoked.

(Continued…)

D. Likely Price Effects

*Original Investigations***.** In the original investigations, the pricing data showed that subject imports undersold the domestic like product in all six available quarterly comparisons. Consistent with these data, most purchasers reported that the domestic like product was inferior to subject imports in terms of price, and several purchasers reported switching from domestic calhypo to subject imports based on price. Moreover, the lost sales record further indicated that subject imports were lower-priced than the domestic like product. Given the foregoing, as well as the degree of substitutability between domestic and subject calhypo and the importance of price in purchasing decisions, the Commission found the underselling by subject imports to be significant.[91]

The Commission also found that subject imports had depressed prices for the domestic like product to a significant degree. As the Commission observed, prices declined for three of the four domestically produced pricing products over the POI. Because these price declines occurred as demand remained steady and raw material costs generally increased, the Commission found that these declines were caused by subject imports rather than other factors.[92]

Summarizing the foregoing, the Commission concluded that subject imports had significantly undersold the domestic like product, and that lower-priced subject imports had significantly depressed the domestic industry's prices. Consequently, the Commission found that subject imports had significant price effects.[93]

First Reviews. In the first reviews, the Commission found that, should the orders be revoked, subject producers would likely resume their aggressive pricing from the original investigations to gain market share, in turn causing the domestic industry to cut prices or forego price increases to avoid losing sales. Accordingly, the Commission concluded that subject imports would likely engage in significant underselling if the orders were revoked, which would likely have significant depressing or suppressing effects on domestic prices.[94]

The record of these expedited reviews contains no information on inventories of subject merchandise or the potential for product shifting. The available information indicates that calhypo from China has not been subject to antidumping or countervailing duty investigations outside the United States. CR/PR at 1.18.

[91] *Original Determinations*, USITC Pub. 4515 at 17.

[92] *Original Determinations*, USITC Pub. 4515 at 17-18.

[93] *Original Determinations*, USITC Pub. 4515 at 18.

[94] *First Review Determinations*, USITC Pub. 5065 at 16.

Current Reviews. As discussed in section III.B.3. above, we continue to find that there is a high degree of substitutability between domestic and subject calhypo, and that price is an important factor in calhypo purchasing decisions.

The record in these expedited reviews does not contain recent product-specific pricing information. Based on the information available, including the high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, we find that, if the orders were revoked, significant volumes of subject imports would likely undersell the domestic like product to a significant degree, as they did in the original investigations. Absent the discipline of the orders, the significant volumes of low-priced subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or restrain price increases necessary to cover any increasing costs, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, subject imports would likely have significant price effects.

E. Likely Impact

Original Investigations. In the original investigations, the Commission found that significant volumes of subject imports had pervasively undersold the domestic like product, depressing the domestic industry's prices and reducing its sales from 2011 to 2013. In turn, this caused declines in the industry's revenues from 2011 to 2013, leading to a deterioration in its financial performance between those years. Accordingly, the Commission concluded that subject imports had a significant adverse impact on the domestic industry during the POI.[95]

The Commission also considered whether there were other factors that may have had an adverse impact on the domestic industry during the POI to ensure that it was not attributing injury from such other factors to subject merchandise. It found that demand trends could not explain the industry's performance declines during the POI, as demand remained stable throughout the period. It likewise found that nonsubject imports could not explain these declines, as such imports had only a small presence in the U.S. market throughout the period.[96]

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[95] *Original Determinations*, USITC Pub. 4515 at 19-22. In reaching this conclusion, the Commission accorded reduced weight to the improvements in the domestic industry's performance in interim 2014 relative to interim 2013, as it attributed these improvements to the filing of the petitions. *Id*. at n.111.

[96] *Original Determinations*, USITC Pub. 4515 at 21.

First Reviews. In the first reviews, the Commission considered the limited information available concerning the domestic industry's performance in 2018 and determined it insufficient to make a finding on whether the domestic industry was in a vulnerable condition. The Commission found that, should the orders be revoked, the likely significant volume and price effects of the subject imports would likely have a significant adverse impact on the domestic industry.[97]

In its non-attribution analysis, the Commission found that, in the event of revocation, nonsubject imports – which had continued to maintain only a small presence during the POR – would not prevent subject imports from entering the U.S. market at levels and prices that would cause the domestic industry material injury. Because the domestic industry had supplied the majority of the U.S. market during the POR and subject imports would likely compete head-to-head with the domestic industry's products upon revocation, the Commission found that the likely increase in subject imports upon revocation would likely take market share from the domestic industry. Consequently, the Commission concluded, subject imports would likely have adverse effects distinct from any that may be caused by nonsubject imports in the event of revocation.[98]

Current Reviews.[99] The record in these expedited reviews contains limited new information concerning the domestic industry's performance since the last reviews. The information available indicates that the industry's output indicators in 2024 were generally the same as or higher than in 2018, the last year of the first reviews, but were generally lower than in 2013, the last full year of the original investigations.[100] The industry's capacity in 2024 was roughly the same as in 2018 but lower than in 2013.[101] The industry's production in 2024 was

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[97] *First Review Determinations*, USITC Pub. 5065 at 17.

[98] *First Review Determinations*, USITC Pub. 5065 at 17-18.

[99] In its second expedited review of the antidumping duty order, Commerce determined that revocation of the order would likely result in the continuation or recurrence of dumping at margins of up to 210.52 percent. *Calcium Hypochlorite from the People's Republic of China: Final Results of the Second Expedited Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 48047 (Oct. 3, 2025). In its second expedited review of the countervailing duty order, Commerce determined that revocation of the order would likely result in the continuation or recurrence of countervailable subsidies at a net countervailable subsidy rate of 65.85 percent. *Calcium Hypochlorite from the People's Republic of China: Final Results of the Second Expedited Sunset Review of the Countervailing Duty Order*, 90 Fed. Reg. 51652 (Nov. 18, 2025).

[100] CR/PR at Table 1.6. As discussed in section III.B.1 above, the lower data coverage of the domestic industry in these reviews as compared to the original investigations may affect comparisons in this section.

[101] CR/PR at Table 1.4. The domestic industry's capacity was *** pounds in 2024, compared to *** pounds in 2018 and *** pounds in 2013. *Id*.

higher than in 2018 but lower than in 2013.[102] The industry's capacity utilization in 2024 was higher than in both 2018 and 2013.[103] The industry's U.S. shipments in 2024 were lower than in both 2018 and 2013.[104]

The information available indicates that under the discipline of the orders the domestic industry's financial performance strengthened in 2024 compared to both 2018 and 2013. The industry's net sales revenues, gross profits, operating income, cost of goods sold ("COGS")-to-net-sales ratio, and operating-income-to-net-sales ratio each improved in 2024 relative to both 2018 and 2013.[105] The limited information on the record is insufficient for us to make a finding as to whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of these orders.

Based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of subject imports that would likely undersell the domestic like product to a significant degree. Given the high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or significantly depress or suppress prices for the domestic like product. The likely significant volume of low-priced subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Consequently, we conclude that if the orders were revoked, subject imports from China would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

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[102] CR/PR at Table 1.4. The domestic industry's production was *** pounds in 2024, compared to *** pounds in 2018 and *** pounds in 2013. *Id*.

[103] CR/PR at Table 1.4. The domestic industry's capacity utilization was *** percent in 2024, compared to *** percent in 2018 and *** percent in 2013. *Id*.

[104] CR/PR at Table 1.4. The domestic industry's U.S. shipments were *** in 2024, compared to *** pounds in 2018 and *** pounds in 2013. *Id*.

[105] CR/PR at Table 1.4. The domestic industry's net sales revenues were $*** in 2024, compared to $*** in 2018 and $*** in 2013. The industry's gross profits were $*** in 2024, compared to $*** in 2018 and $*** in 2013. The industry's operating income was $*** in 2024, compared to $*** in 2018 and $*** in 2013. The industry's COGS-to-net-sales ratio was *** percent in 2024, compared to *** percent in 2018 and *** percent in 2013. *Id*. The industry's operating-income-to-net-sales ratio was *** percent in 2024, compared to *** percent in 2018 and *** percent in 2013. *Id*.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Nonsubject imports' share of the U.S. market remained *** in 2024, at *** percent, while the domestic industry's share remained *** that year, at *** percent.[106] Because the information available indicates that the domestic industry currently supplies the *** of the U.S. market, the significant volume of low-priced, highly substitutable subject imports that we have found likely after revocation would likely take market share currently held by the domestic industry, as well as possibly from nonsubject imports. Consequently, we find that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry within a reasonably foreseeable time after revocation.

As discussed, the record does not indicate that there are likely to be significant changes in apparent U.S. consumption in the foreseeable future. We recognize that apparent U.S. consumption was *** percent lower in 2024 than in 2018.[107] To the extent that demand remains weak or declines, the significant volume of low-priced subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry. Accordingly, we find that the likely effects attributable to subject imports are distinguishable from any likely effects of demand if the orders were revoked.

IV. Conclusion

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

[106] CR/PR at Table 1.6.

[107] CR/PR at Table 1.6. As discussed above, the lower data coverage of the domestic industry in these reviews as compared to the original investigations may explain the decline in apparent U.S. consumption compared to the original investigations. *See* CR/PR at Table 1.6. However, data coverage does not appear to explain lower apparent U.S. consumption during 2024 compared to 2018 during the first reviews because IWC was the only reporting domestic producer in both the prior reviews and these reviews. *See* CR/PR at B.3; *First Review Determinations*, USITC Pub. 5065 at 4.

Information obtained in these reviews

Background

On June 2, 2025, the U.S. International Trade Commission ("Commission") gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("the Act"),[1] that it had instituted reviews to determine whether revocation of the antidumping and countervailing duty orders on calcium hypochlorite ("calhypo") from China would be likely to lead to continuation or recurrence of material injury.[2] All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.[3] [4] Table 1.1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
June 2, 2025	Notice of initiation by Commerce (90 FR 23310, June 2, 2025)
June 2, 2025	Notice of institution by Commission (90 FR 23361, June 2, 2025)
September 5, 2025	Commission's vote on adequacy
October 3, 2025	Commerce's results of its expedited antidumping review (90 FR 48047 October 3, 2025)
November 18, 2025	Commerce's results of its expedited countervailing review (90 FR 51652 November 18, 2025)
February 6, 2026	Commission's determinations and views

Note: Due to the lapse in appropriations and ensuing cessation of Commission operations, the schedule for this proceeding has been tolled.

[1] 19 U.S.C. 1675(c).

[2] 90 FR 23361, June 2, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 90 FR 23310, June 2, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

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

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

The original investigations

The original investigations resulted from a petition filed on December 18, 2013 with Commerce and the Commission by Arch Chemicals, Inc. ("Arch"), a Lonza Company, Atlanta, Georgia.[5] On December 15, 2014, Commerce determined that imports of calhypo from China were being sold at less than fair value ("LTFV") and subsidized by the Government of China.[6] The Commission determined on January 21, 2015 that the domestic industry was materially injured by reason of such imports of calhypo from China.[7] On January 30, 2015, Commerce issued antidumping and countervailing duty orders with the final weighted-average dumping margin of 210.52 percent and net subsidy rate of 65.85 percent.[8]

The first five-year review

On March 6, 2020, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on calhypo from China.[9] On April 7, 2020, Commerce determined that revocation of the antidumping and countervailing duty orders on calhypo from China would be likely to lead to continuation or recurrence of dumping and subsidization.[10] [11] On June 17, 2020, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.[12] Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective July 1, 2020, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of calhypo from China.[13]

[5] Calcium Hypochlorite from China, Inv. Nos. 701-TA-510 and 731-TA-1245 (Final), USITC Publication 4515, January 2015 ("Original publication"), p. 1.1.

[6] 79 FR 74065, December 15, 2014; and 79 FR 74064, December 15, 2014.

[7] 80 FR 4312, January 27, 2015.

[8] 80 FR 5085, January 30, 2015; and 80 FR 5082, January 30, 2015.

[9] 85 FR 29740, May 18, 2020.

[10] 85 FR 19439, April 7, 2020.

[11] 85 FR 19443, April 7, 2020.

[12] 85 FR 37690, June 23, 2020.

[13] 85 FR 39522, July 1, 2020.

Previous and related investigations

The Commission has conducted one previous import relief investigations on calhypo and a number of investigations on a related product also used primarily for swimming pool sanitation, chlorinated isocyanurates ("chlorinated isos"), as presented in table 1.2.

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

Date	Number	Country	Product	ITC original determination	Current status
1985	731-TA-189	Japan	Calhypo	Affirmative	Revoked January 1, 2000
2005	731-TA-1083	Spain	Chlorinated isos	Affirmative	Continued after third review in 2022
2005	731-TA-1082	China	Chlorinated isos	Affirmative	Continued after third review in 2022
2014	731-TA-1226	Japan	Chlorinated isos	Negative	N/A
2014	701-TA-501	China	Chlorinated isos	Affirmative	Continued after second review in 2025

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: "Date" refers to the year in which the investigation was instituted by the Commission.

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of calhypo from China with the intent of issuing the final results of these reviews based on the facts available not later than September 30, 2025.[14] Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at https://access.trade.gov/public/FRNoticesListLayout.aspx and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of calhypo from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

[14] Letter from Alex Villanueva, Senior Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, July 21, 2025.

The product

Commerce's scope

Commerce has defined the scope as follows:

> Calcium hypochlorite, regardless of form (e.g., powder, tablet (compressed), crystalline (granular), or in liquid solution), whether or not blended with other materials, containing at least 10 percent available chlorine measured by actual weight. The scope also includes bleaching powder and hemibasic calcium hypochlorite.
>
> Calcium hypochlorite has the general chemical formulation $Ca(OCl)_2$, but may also be sold in a more dilute form as bleaching powder with the chemical formulation, $Ca(OCl)_2.CaCl_2.Ca(OH)_2.2H_2O$ or hemibasic calcium hypochlorite with the chemical formula of $2Ca(OCl)_2.Ca(OH)_2$ or $Ca(OCl)_2.0.5Ca(OH)_2$. Calcium hypochlorite has a Chemical Abstract Service (CAS) registry number of 7778-54-3, and a U.S. Environmental Protection Agency (EPA) Pesticide Code (PC) Number of 014701. The subject calcium hypochlorite has an International Maritime Dangerous Goods (IMDG) code of Class 5.1 UN 1748, 2880, or 2208 or Class 5.1/8 UN 3485, 3486, or 3487.[15]

[15] 85 FR 39522, July 1, 2020.

U.S. tariff treatment

Calhypo is currently provided for in Harmonized Tariff Schedule of the United States ("HTS") subheading 2828.10.00.[16] The general rate of duty is 2.4 percent ad valorem for HTS subheading 2828.10.00.[17] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 24, 2018, calhypo originating in China was subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for calhypo was increased to 25 percent.[18]

Effective February 4, 2025, calhypo originating in China was subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act ("IEEPA"), and on March 4, 2025, that additional duty increased to 20 percent ad valorem.[19]

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

[16] HTS subheading 2828.10.00 covers only calcium hypochlorite.

[17] USITC, HTS (2025) Revision 17, Publication 5649, August 2025, p. 28.18.

[18] 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e), 20(f), and 20(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 17, Publication 5649, August 2025, pp. 99.3.50 to 99.3.75, 99.3.365. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

[19] 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 17, Publication 5649, August 2025, pp. 99.3.4, 99.3.306 to 99.3.307.

[20] The duty as part of tariffs initiated in April 2025 under IEEPA is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 17, Publication 5649, pp. 99.3.1 to 99.3.6, 99.3.307, 99.3.314.

Table 1.3 Calhypo: Additional tariffs on imports from China as of August 4, 2025

Tariffs in percent ad valorem

Additional tariff	China
Section 301	25.0
IEEPA, February 4, 2025	20.0
IEEPA, April 5, 2025	10.0
Total additional ad valorem rate	55.0

Source: Federal Register notices and other sources cited in this section (Tariff treatment).

Note: Duty rates in the table reflect the duty rates as of the writing of this report. See the text above for historical changes to the additional tariffs.

Description and uses[21]

Calhypo is a chemical compound used primarily as a sanitizing agent for swimming pools, spas, and municipal water treatment systems. It is typically sold as a white solid in powder, crystalline, or tablet form. The active ingredient is chlorine, which acts as a biocide, killing algae and other microbes. Calhypo can be sold as a pure product, with available chlorine concentrations of 65-80 percent, or as a product blended with other ingredients. Blended products typically include algaecides and/or flocculants to clarify water and are most commonly sold with available chlorine content of 45-60 percent. Included in the scope for these investigations are bleaching powder and hemibasic calcium hypochlorite, which are calhypo mixtures with lower percentages of available chlorine.

Calhypo's effectiveness in sanitizing water is due to chlorine's properties as a strong oxidizing agent, disrupting the cellular activity of a broad range of microorganisms. For these biocidal applications, calhypo is subject to regulation by the U.S. Environmental Protection Agency (EPA) under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). EPA registrations apply to specific concentrations of active chlorine, and so a producer selling multiple concentrations requires multiple EPA registrations. In the original investigations, the petitioner stated that the EPA registration process was not a barrier to importing calhypo.

Calhypo's oxidizing properties also make it effective in degrading non-living material, a desirable quality in applications such as pool and spa maintenance. However, oxidizers can enhance or cause the combustion of other materials, posing fire hazards in transportation and storage. Domestically, the transportation of calhypo is regulated by the U.S. Department of Transportation, which classifies products containing more than 39 percent chlorine content by

[21] Unless otherwise noted, this information is based on Calcium Hypochlorite from China, Inv. Nos. 701-TA-510 and 731-TA-1245 (Review), USITC Publication 5065, June 2020 ("First review publication"), pp. 1.6 to 1.8.

weight as a hazardous material whose transportation requires special handling. The National Fire Protection Association (NFPA) classifies calhypo as a class I, II, or III oxidizer depending on chlorine concentration. NFPA's guidelines for storage at retail facilities include requirements for sprinklers and recommended maximum quantities.

The principal application of calhypo in the United States is in water treatment at commercial and residential pools and spas. Calhypo is used both to maintain regular chlorine levels and/or to deliver quick, remedial increases in chlorine. For pool and spa applications, calhypo typically contains 45, 68, or 75 percent available chlorine. Other applications as a biocide include disinfection of drinking water and wastewater clearing, laundry, sanitizing food and non-food contact surfaces, and washing fruits and vegetables. Calhypo also has applications other than as a biocide, including treating cyanide in wastewater.

Municipal purification of water for drinking, which requires precise control of calhypo levels, typically uses a feeder certified by NSF International (an independent standards and certification organization) for usage with a specific manufacturer's tablet. In the original investigation the petitioner acknowledged that for municipal governments that use calhypo for water purification, there are standards for the usage of a specific manufacturer's tablets to match a customer's purification equipment. However, the petitioner asserted that these standards do not limit the purchase of imported calhypo as some municipal customers view them as recommendations, not requirements. Furthermore, the petitioner stated that for wastewater treatment, the other major municipal calhypo application, there were no NSF standards and municipal customers could use any producer's calhypo tablets.

Calhypo is sold by manufacturers to end users, repackers, distributors, dealers, and other retailers. Manufacturers may also engage contract and toll packagers to formulate, tablet, or package products. In the retail market, repackers transfer bulk chemical into smaller packages, in some cases with a private brand, and may tablet calhypo and/or blend it with other components. Wholesale distributors market to commercial pools, retailers, and pool service companies. Both specialty stores and large discount stores sell to retail consumers.

Providers of pool maintenance services and commercial pools and spas themselves are also part of the retail distribution channel. In the institutional and industrial channel of distribution, manufacturers may sell directly to end users, or product may move through distributors and repackers.

Manufacturing process[22]

Calhypo is produced by combining chlorine and calcium hydroxide (lime). There are two main production processes: one using sodium, and the other using calcium. The sodium process yields higher available chlorine content and, with some variations, is sued for all domestic product and the majority of imported Chinese product. In the sodium process, caustic soda (NaOH) and chlorine (Cl_2) are combined in a reactor, yielding sodium hypochlorite (NaOCl), sodium chloride (NaCl) and water. The sodium hypochlorite is then combined with hydrated lime and chlorine to create calcium hypochlorite paste ($Ca(OCl)_2$). Calcium hypochlorite paste is filtered to produce a cake, which is dried to a granular or powder form. This material is cooled, compacted, and crushed, then screened for size. Under- and over-sized material is recycled. The resulting product typically has an available chlorine content of approximately 68 percent and can be packaged for sale, blended with other materials, and/or tableted. Variations in the sodium process include approaches that yield calhypo with different percentages of available chlorine, both higher purity product (with 78 percent available chlorine) and lower purity products, including bleaching powder (approximately 35 percent chlorine).

In the calcium process, lime is blended with chlorine to produce hemibasic calcium hypochlorite crystals. After removal of calcium chloride by filtering or centrifuging, the crystals are dried to make a final product with approximately 60 percent available chloride content. The calcium process is believed to be used by some manufacturers in China, although not for export to the United States.

[22] Unless otherwise noted, this information is based on First review publication, p. 1.8.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from two firms, which accounted for all production of calhypo in the United States during 2013.[23]

During the first five-year reviews, domestic interested parties provided a list of two known and currently operating U.S. producers of calhypo.[24] One responding firm accounted for approximately *** percent of production of calhypo in the United States during 2018.[25]

In response to the Commission's notice of institution in these current review, domestic interested parties provided a list of two known and currently operating U.S. producers of calhypo. One firm providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of calhypo in the United States during 2024.[26]

Recent developments

There were no major developments in the calhypo industry since the continuation of the orders identified by interested parties in this proceeding and no relevant information from outside sources was found.

[23] Original publication, pp. 1.3, 1.4.

[24] Calcium hypochlorite from China Investigation nos. 701-TA-510 and 731-TA-1245 (Review) USITC Publication 5065 ("Second review publication") p. 1.9

[25] Investigation Nos. 701-TA-510 and 731-TA-1245 (Second review): Calcium Hypochlorite from China, Confidential Report,INV-SS-016 (February 21, 2020) ("Second review confidential report"), p. 1.9

[26] Domestic interested party's response to the notice of institution, July 2, 2025, exh. 1.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

Table 1.4 Calhypo: Trade and financial data submitted by U.S. producers, by period

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

Item	Measure	2013	2018	2024
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
Capacity utilization	Ratio	***	***	***
U.S. shipments	Quantity	***	***	***
U.S. shipments	Value	***	***	***
U.S. shipments	Unit value	***	***	***
Net sales	Value	***	***	***
COGS	Value	***	***	***
COGS to net sales	Ratio	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***

Source: For the years 2013 and 2018, data are compiled using data submitted in the Commission's original investigation and first five-year reviews. For the year 2024, data are compiled using data submitted by the domestic interested party. Domestic interested party's response to the notice of institution, July 2, 2025, exh.1.

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

Note: ***.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.[27]

In its original determinations and its expedited first five-year reviews determinations, the Commission defined a single domestic like product consisting of all calcium hypochlorite coextensive with Commerce's scope. In its original determinations and its expedited first five-year review determinations, the Commission defined the domestic industry to include all domestic producers of calcium hypochlorite. In its original determinations the Commission also determined that domestic firms that did not produce calcium hypochlorite but solely converted it to tablet form did not engage in sufficient production-related activities and therefore were not included in the domestic industry definition.[28]

[27] Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).
[28] 90 FR 23361, June 2, 2025.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from four firms, which accounted for approximately 15.8 percent of total U.S. imports of calhypo from China between January 2011 and June 2014.[29] Import data presented in the original investigations are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of nine firms that may have imported calhypo from China.[30] Import data presented in the first reviews are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in these current five-year reviews, in its response to the Commission's notice of institution, the domestic interested party provided a list of three potential U.S. importers of calhypo.[31]

[29] Original publication, p. 4.1.
[30] Second review publication p. 1.11
[31] Domestic interested party's response to the notice of institution, July 2, 2025, exh. 6.

U.S. imports

Table 1.5 presents the quantity, value, and unit value of U.S. imports of calhypo from subject and nonsubject sources. During 2019 to 2024, there were no U.S. imports of calhypo from China and the vast majority of U.S. imports of calhypo were sourced from India. U.S. imports from India increased sharply in 2022 and 2023 before declining steeply in 2024.

Table 1.5 Calhypo: U.S. imports, by source and period

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

U.S. imports from	Measure	2019	2020	2021	2022	2023	2024
China	Quantity	—	—	—	—	—	—
India	Quantity	3,091	3,685	5,359	17,388	29,385	6,047
All other sources	Quantity	—	42	576	5	23	107
Nonsubject sources	Quantity	3,091	3,728	5,935	17,393	29,409	6,154
All import sources	Quantity	3,091	3,728	5,935	17,393	29,409	6,154
China	Value	—	—	—	—	—	—
India	Value	2,277	2,740	4,195	20,178	34,058	6,098
All other sources	Value	—	28	572	36	90	142
Nonsubject sources	Value	2,277	2,768	4,767	20,214	34,148	6,240
All import sources	Value	2,277	2,768	4,767	20,214	34,148	6,240
China	Unit value	—	—	—	—	—	—
India	Unit value	0.74	0.74	0.78	1.16	1.16	1.01
All other sources	Unit value	—	0.67	0.99	7.2	3.9	1.33
Nonsubject sources	Unit value	0.74	0.74	0.80	1.16	1.16	1.01
All import sources	Unit value	0.74	0.74	0.80	1.16	1.16	1.01

Source: Compiled from official Commerce statistics for HTS statistical reporting number 2828.10.0000, accessed July 3, 2025.

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

Apparent U.S. consumption and market shares

Table 1.6 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.6 Calhypo: Apparent U.S. consumption and market shares, by source and period

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

Source	Measure	2013	2018	2024
U.S. producers	Quantity	***	***	***
China	Quantity	13,247	—	—
Nonsubject sources	Quantity	1,124	2,043	6,154
All import sources	Quantity	14,372	2,043	6,154
Apparent U.S. consumption	Quantity	***	***	***
U.S. producers	Value	***	***	***
China	Value	9,233	—	—
Nonsubject sources	Value	729	1,538	6,240
All import sources	Value	9,961	1,538	6,240
Apparent U.S. consumption	Value	***	***	***
U.S. producers	Share of quantity	***	***	***
China	Share of quantity	***	—	—
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	***	***	***
U.S. producers	Share of value	***	***	***
China	Share of value	***	—	—
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	***	***	***

Source: For the years 2013 and 2018, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2024, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 2828.10.0000, accessed July 3, 2025.

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

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

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received no useable responses. During the preliminary phase of the original investigation, the Commission received responses from two firms which accounted for approximately *** percent of overall production of calhypo in China and *** percent of all calhypo exports to the United States from China in 2012.[32]

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of 27 possible producers of calhypo in China in that proceeding.[33]

Although the Commission did not receive responses from any respondent interested parties in these current five-year reviews, the domestic interested party provided a list of four possible producers of calhypo in China.[34]

Recent developments

Table 1.7 presents events in the Chinese industry since the Commission's last five-year reviews.

Table 1.7 Calhypo: Developments in the Chinese industry

Item	Firm	Event
***	***	***.

Source: Held, Heike, et al., *Hypochlorite Bleaches*, S&P Global. *Chemical Economics Handbook*. July 2024, pp. 176 to 177.

[32] Investigation Nos. 701-TA-510 and 731-TA-1245 (Final): Calcium Hypochlorite from China, Confidential Report, INV-MM-130, December 19, 2014, as revised in INV-MM-135, December 23, 2014 ("Original confidential report"), pp. 7.3-7.5.

[33] Second review publication, p. 1.14

[34] Domestic interested party's response to the notice of institution, July 2, 2025, exh. 7.

Exports

Table 1.8 presents export data for commercial calcium hypochlorites and other calcium hypochlorites, from China (by export destination in descending order of quantity for 2024). Brazil, the largest export market in 2024, accounted for 11.6 percent of total Chinese exports. The United States was not one of the 10 largest export markets for China under this HS category during 2019 through 2024.

Table 1.8 Commercial calcium hypochlorites and other calcium hypochlorites: Quantity of exports from China, by destination and period

Quantity in 1,000 pounds

Destination market	2019	2020	2021	2022	2023	2024
Brazil	10,878	13,374	18,123	33,697	24,706	30,630
Vietnam	14,826	17,466	24,849	22,373	27,902	26,376
Thailand	21,299	28,843	29,961	25,536	23,689	25,592
Philippines	11,701	7,402	8,565	25,720	17,541	18,760
Russia	43,836	37,922	33,965	39,644	21,875	12,139
Australia	8,705	10,469	6,994	9,629	9,058	10,441
Canada	3,482	4,287	7,424	8,518	7,586	9,257
Malaysia	5,646	5,521	5,979	7,655	7,750	8,927
Peru	3,237	5,324	4,421	6,990	6,946	8,427
Colombia	6,452	6,705	3,137	7,472	9,433	8,261
All other markets	71,072	74,388	66,476	77,566	104,800	104,836
All markets	201,134	211,701	209,893	264,800	261,286	263,647

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 2828.10, accessed July 24, 2025.

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

Third-country trade actions

Based on available information, calhypo from China has not been subject to other antidumping or countervailing duty investigations outside the United States.

The global market

Table 1.9 presents global export data for commercial calcium hypochlorites and other calcium hypochlorites (by source in descending order of quantity for 2024). Global exports in this category increased abruptly in 2021, then decreased from 2021 to 2024, ending lower than in 2019. In each year of the review, China and India were the two largest exporters by volume. Chemical Economics Handbook (CEH) reported the nonsubject calhypo producing nations with the largest capacity are ***.[35]

Table 1.9 Commercial calcium hypochlorites and other calcium hypochlorites: Quantity of global exports by country and period

Quantity in 1000 pounds

Exporting country	2019	2020	2021	2022	2023	2024
China	201,134	211,701	209,893	264,800	261,286	263,647
India	67,420	69,342	81,068	100,971	103,655	103,877
United States	49,252	44,416	39,792	37,170	26,420	9,304
Portugal	1,098	1,711	2,136	3,899	5,001	6,100
South Africa	11,056	11,619	256,572	8,926	5,965	5,819
Belgium	12,668	9,927	12,547	14,813	8,403	5,213
Hong Kong	5,805	2,433	13,802	5,974	4,251	5,212
Romania	4,485	5,681	3,191	3,652	4,386	4,229
Spain	926	1,316	2,601	1,498	1,642	4,141
Netherlands	4,162	4,586	4,213	2,152	1,900	2,339
All other exporters	80,555	82,361	72,649	40,864	22,837	19,413
All exporters	438,560	445,092	698,464	484,720	445,747	429,293

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 2828.10, accessed July 24, 2025.

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

[35] CEH calculates estimated capacity on a total chlorine equivalent basis, allowing for comparison of producers of different concentrations. Held, Heike, et al., *Hypochlorite Bleaches*, S&P Global. *Chemical Economics Handbook*. July 2024, pp. 17, 165.

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
90 FR 23310, June 2, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.federalregister.gov/documents/2025/06/02/2025-09939/initiation-of-five-year-sunset-reviews
90 FR 23361, June 2, 2025	Calcium Hypochlorite From China; Institution of Five-Year Reviews	https://www.federalregister.gov/documents/2025/06/02/2025-09830/calcium-hypochlorite-from-china-institution-of-five-year-reviews

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission's notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject review. They were filed on behalf of the following entity:

1. Innovative Water Care LLC ("IWC"), domestic producer of calcium hypochlorite (referred to herein as "domestic interested party")

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

Table B.1 Calhypo: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage
U.S. producer	1	***%

Note: The U.S. producer coverage figure presented is the domestic interested party's estimate of its share of total U.S. production of calhypo during 2024. Domestic interested party's response to the notice of institution, July 2, 2025, exh. 1.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from IWC. IWC requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on calhypo.[1]

Company-specific information

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

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

Item	IWC
Nature of operation	Yes
Statement of intent to participate	Yes
Statement of likely effects of revoking the order	Yes
U.S. producer list	Yes
U.S. importer/foreign producer list	Yes
List of 3-5 leading purchasers	Yes
List of sources for national/regional prices	NA
Trade/financial data	Yes
Changes in supply/demand	Yes
Complete response	Yes

[1] Domestic interested party's comments on adequacy, August 13, 2025, pp. 3, 4.

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C.1
Calhypo: Summary data concerning the U.S. market, 2011-13, January to June 2013, and January to June 2014
(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted)

	Report data					Period changes			
	Calendar year			January to June		Calendar year			Jan-June
	2011	2012	2013	2013	2014	2011-13	2011-12	2012-13	2013-14
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China	***	***	***	***	***	***	***	***	***
All others sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China	***	***	***	***	***	***	***	***	***
All others sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. Imports from:									
China:									
Quantity	9,481	10,626	13,247	9,834	3,910	39.7	12.1	24.7	-60.2
Value	6,532	7,798	9,233	6,896	2,736	41.4	19.4	18.4	-60.3
Unit value	$0.69	$0.73	$0.70	$0.70	$0.70	1.2	6.5	-5.0	-0.2
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity	1,790	741	1,124	378	859	-37.2	-58.6	51.8	127.1
Value	1,223	559	729	269	518	-40.4	-54.2	30.3	92.1
Unit value	$0.68	$0.76	$0.65	$0.71	$0.60	-5.1	10.6	-14.2	-15.4
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Total imports:									
Quantity	11,271	11,367	14,372	10,212	4,769	27.5	0.9	26.4	-53.3
Value	7,754	8,357	9,961	7,165	3,254	28.5	7.8	19.2	-54.6
Unit value	$0.69	$0.74	$0.69	$0.70	$0.68	0.7	6.9	-5.7	-2.8
Ending inventory quantity	***	***	***	***	***	***	***	***	***
U.S. producers':									
Powder form calhypo:									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1)	***	***	***	***	***	***	***	***	***
Tablet form calhypo:									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1)	***	***	***	***	***	***	***	***	***
U.S. shipments (combined) (fn2):									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	$***	$***	$***	$***	$***	$***	$***	$***	$***
Export shipments (combined) (fn3):									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	$***	$***	$***	$***	$***	$***	$***	$***	$***
Powder form calhypo:									
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1)	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***	***	***	***	***
Productivity (pounds per hour)	***	***	***	***	***	***	***	***	***
Unit labor costs	$***	$***	$***	$***	$***	$***	$***	$***	$***
Tablet form calhypo:									
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1)	***	***	***	***	***	***	***	***	***
Production workers	***	***	***	***	***	***	***	***	***
Hours worked (1,000s)	***	***	***	***	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***	***	***	***	***
Productivity (pounds per hour)	***	***	***	***	***	***	***	***	***
Unit labor costs (dollars per pound)	$***	$***	$***	$***	$***	$***	$***	$***	$***
Financial data (excluding Stellar except as noted): (fn4)									
Net Sales									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	$***	$***	$***	$***	$***	$***	$***	$***	$***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***
Gross profit of (loss)	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures (fn4)	***	***	***	***	***	***	***	***	***
Unit COGS	$***	$***	$***	$***	$***	$***	$***	$***	$***
Unit SG&A expenses	$***	$***	$***	$***	$***	$***	$***	$***	$***
Unit operating income or (loss)	$***	$***	$***	$***	$***	$***	$***	$***	$***
COGS/sales (fn1)	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***

Notes:

fn1.--Report data are in percent and period changes are in percentage points.
fn2.--Combines powder-form and tablet-form U.S. shipments of calhypo eliminating doublecounting. See part III for a discussion of the adjustments.
fn3.--Combines powder-form and tablet-form U.S. shipments of calhypo. Doublecounting is not an issue in compiling export data between levels.
fn4.--Reported financial data excluded the toll producer Stellar's results except reported capital expenditures which includes data reported by Stellar.

Source: Compiled from data submitted in response to Commission questionnaires and Customs data for HTS number 2828.10.000.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

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

1. Have there been any significant changes in the supply and demand conditions for calcium hypochlorite that have occurred in the United States or in the market for calcium hypochlorite in China since January 1, 2019?

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

2. Do you anticipate any significant changes in the supply and demand conditions for calcium hypochlorite in the United States or in the market for calcium hypochlorite in China within a reasonably foreseeable time?

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