Paper Plates from China, Thailand, and Vietnam

Investigation Nos. 701-TA-704-705 and 731-TA-1664-1666 (Preliminary)

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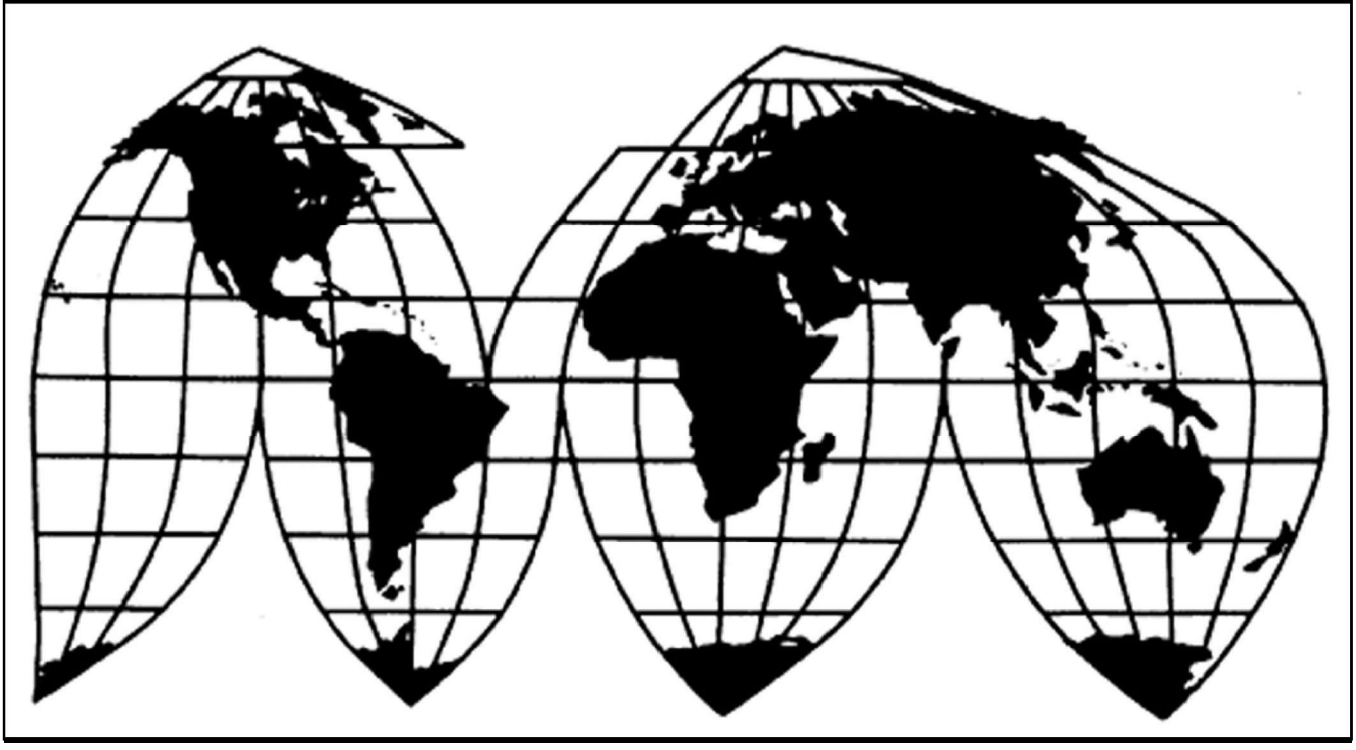
U.S. International Trade Commission



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U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-704-705 and 731-TA-1664-1666 (Preliminary)

Paper Plates from China, Thailand, and Vietnam

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of paper plates from China, Thailand, and Vietnam, provided for in subheading 4823.69.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value ("LTFV") and to be subsidized by the governments of China and Vietnam.[2]

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission's rules, upon notice from the U.S. Department of Commerce ("Commerce") of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Any other party may file an entry of appearance for the final phase of the investigations after publication of the final phase notice of scheduling. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a

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

[2] 89 FR 13043 (February 21, 2024) and 89 FR 14046 (February 26, 2024).

public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations. As provided in section 207.20 of the Commission's rules, the Director of the Office of Investigations will circulate draft questionnaires for the final phase of the investigations to parties to the investigations, placing copies on the Commission's Electronic Document Information System (EDIS, https://edis.usitc.gov), for comment.

BACKGROUND

On January 25, 2024, the American Paper Plate Coalition, which is comprised of AJM Packaging Corporation, Bloomfield Hills, Michigan; Aspen Products, Inc., Kansas City, Missouri; Dart Container Corporation, Mason, Michigan; Hoffmaster Group, Inc., Oshkosh, Wisconsin; Huhtamaki Americas, Inc., De Soto, Kansas; and Unique Industries, Inc., Philadelphia, Pennsylvania, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of paper plates from China and Vietnam and LTFV imports of paper plates from China, Thailand, and Vietnam. Accordingly, effective January 25, 2024, the Commission instituted countervailing duty investigation Nos. 701-TA-704-705 and antidumping duty investigation Nos. 731-TA-1664-1666 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of January 31, 2024 (89 FR 6130). The Commission conducted its conference on February 15, 2024. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of paper plates from China, Thailand, and Vietnam that are allegedly sold in the United States at less than fair value and imports of paper plates from China and Vietnam that are allegedly subsidized by the governments of China and Vietnam.

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.[1] In applying this standard, the Commission weighs the evidence before it and determines whether "(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation."[2]

II. Background

The petitions in these investigations were filed on January 25, 2024 by the American Paper Plate Coalition ("APPC"), a coalition consisting of six domestic producers of paper plates.[3] Representatives from each of the domestic producers comprising the APPC appeared at the staff conference accompanied by counsel. The APPC also submitted a postconference brief.[4]

[1] 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States, 2*0 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

[2] *American Lamb Co.*, 785 F.2d at 1001; *see also Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

[3] The six domestic producers that constitute the APPC are: AJM Packaging Corporation ("AJM"); Aspen Products, Inc. ("Aspen"); Dart Container Corporation ("Dart Container"); Hoffmaster Group, Inc. ("Hoffmaster"); Huhtamaki Americas, Inc. ("Huhtamaki"); and Unique Industries, Inc. ("Unique Industries"). Petition at 1.

[4] APPC Postconference Br. (Feb. 21, 2024), EDIS Doc. 814620.

No respondent party appeared at the staff conference. However, Acadian Crossing Consumer Products, LLC ("Acadian"), a U.S. importer of subject merchandise, filed a postconference brief.[5] [6]

Data Coverage. U.S. industry data are based on the questionnaire responses of seven domestic producers, accounting for the vast majority of U.S. production of paper plates in 2022.[7] U.S. import data are based on questionnaire responses from 14 U.S. importers, estimated to have accounted for *** percent of subject imports from China, *** percent of subject imports from Thailand, and *** percent of subject imports from Vietnam in 2022. Responding U.S. importers also accounted for *** percent of nonsubject imports and approximately *** percent of total imports of paper plates in 2022.[8] The Commission received responses to its questionnaires from three foreign producers of subject merchandise: one firm in Thailand, which accounted for an *** share of overall production of paper plates in Thailand in 2022,[9] and two firms in Vietnam, which are believed to have accounted for at least *** percent of overall production of paper plates in Vietnam in 2022.[10] The Commission did not receive questionnaire responses from any foreign producers of paper plates in China.[11]

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the "domestic like product" and the "industry."[12] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), defines

[5] Acadian Postconference Br. (Feb. 21, 2024), EDIS Doc. 814664.

[6] In addition, the Retail Industry Leaders Association ("RILA"), a trade association comprised of leading retailers, submitted a statement. RILA Statement (Feb. 22, 2024), EDIS Doc. 814754.

[7] Confidential Staff Report, INV-WW-015 (March 4, 2024) and Revision to the Staff Report, INV-WW-017 (March 8, 2024) ("CR")/*Paper Plates from China, Thailand, and Vietnam*, Inv. Nos. 701-TA-704-705 and 731-TA-1664-1666 (Preliminary), USITC Pub. 5499 (March 2024) ("PR") at III-1.

[8] CR/PR at I-4, IV-1. The percentages reflect the volume of imports reported in importer questionnaire responses for each country source (or sources) compared to the volume of imports reflected in official import statistics for the primary HTS statistical reporting number 4823.69.0040, a basket category HTS number under which imports are believed to have entered as indicated in Commerce's scope definition. To remove out-of-scope imports, these official import statistics were adjusted using data submitted in Commission questionnaires and Census-edited Customs records for firms that certified that they had not imported paper plates during the period of investigation. CR/PR at IV-1 n.3.

[9] ***, the sole responding foreign producer in Thailand, *** of its share of production of paper plates in Thailand in 2022. CR/PR at VII-3 n.6.

[10] CR/PR at VII-3, VII-5.

[11] CR/PR at VII-3.

[12] 19 U.S.C. § 1677(4)(A).

the relevant domestic industry as the "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[13] In turn, the Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[14]

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

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[13] 19 U.S.C. § 1677(4)(A).

[14] 19 U.S.C. § 1677(10).

[15] 19 U.S.C. § 1677(10). The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See*, *e.g.*, *USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States,* 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

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

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

[18] *See, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep't of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case'"). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

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

variations.[20] It may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.[21]

A. Scope Definition

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as:

> . . . certain paper plates. Paper plates subject to these investigations may be cut from rolls, sheets, or other pieces of paper and/or paper board. Paper plates subject to these investigations have a depth up to and including two (2.0) inches, as measured vertically from the base to the top of the lip, or the edge if the plate has no lip. Paper plates subject to these investigations may be uncolored, white, colored, or printed. Printed paper plates subject to these investigations may have any type of surface finish, and may be printed by any means with images, text and/or colors on one or both surfaces. Colored paper plates subject to this investigation may be colored by any method, including but not limited to printing, beater-dyeing, and dip-dyeing. Paper plates subject to these investigations may be produced from paper of any type (including, but not limited to, bamboo, straws, bagasse, hemp, kenaf, jute, sisal, abaca, cotton inters and reeds, or from non-plant sources, such as synthetic resin (petroleum)-based resins), may have any caliper or basis weight, may have any shape or size, may have one or more than one section, may be embossed, may have foil or other substances adhered to their surface, and/or may be uncoated or coated with any type of coating.
>
> The paper plates subject to these investigations remain covered by the scope of these investigations whether imported alone, or in any combination of subject and non-subject merchandise. When paper plates subject to these investigations are imported in combination with non-subject merchandise, only the paper plates subject to these investigations are subject merchandise.
>
> The paper plates subject to these investigations include paper plates matching the above description that have been finished, packaged, or otherwise processed

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

[21] *See*, *e.g.*, *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 (Nov. 2001) at 8 n.34; *Torrington,* 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

in a third country by performing finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the paper plates. Examples of finishing, packaging, or other processing in a third country that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the paper plates include, but are not limited to, printing, application of other surface treatments such as coatings, repackaging, embossing, and application of foil surface treatments.

Excluded from the scope of these investigations are paper plates molded or pressed directly from paper pulp (including but not limited to unfelted pulp), which are currently classifiable under subheading 4823.70.0020 of the Harmonized Tariff Schedule of the United States (HTSUS).

Also excluded from the scope of these investigations are articles that otherwise would be covered but which exhibit the following two physical characteristics: (a) depth (measured vertically from the base to the top of the lip, or edge if no lip) equal to or greater than 1.25 inches but less than two (2.0) inches, and (b) a base not exceeding five (5.0) inches in diameter if round, or not exceeding 20 square inches in area if any other shape.

Also excluded from the scope of these investigations are paper bowls, paper buckets, and paper food containers with closeable lids.[22]

Paper plates are used as tableware for casual dinners, picnics, large formal gatherings, or any event where the plate is to be discarded after eating.[23] They are produced from paper or paperboard and can have any caliper (basis weight) or size.[24] They may be white, colored, or printed and/or laminated with images, text, and/or colors on one or both surfaces.[25] They also can have one or more sections, be fluted or unfluted, and be uncoated or have any surface

[22] *Certain Paper Plates from the People's Republic of China, Thailand, and the Socialist Republic of Vietnam: Initiation of Antidumping Duty Investigations*, 89 Fed. Reg. 14,046 (Feb. 26, 2024*); Certain Paper Plates from the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Countervailing Duty Investigations*, 89 Fed. Reg. 13,043 (Feb. 21, 2024). Commerce indicated that imports of the subject merchandise are currently provided for under HTSUS subheading 4823.69.0040. Commerce further explained that subject merchandise may also be classified under HTSUS subheading 4823.61.0040, and if packaged with other articles, under HTSUS subheadings 9505.90.4000 and 9505.90.6000. 89 Fed. Reg. at 14,052; 89 Fed. Reg. at 13,047.

[23] CR/PR at I-7.

[24] CR/PR at I-7.

[25] CR/PR at I-7.

finish, including but not limited to coating, laminating, cold-stamping, hot-stamping, die-cutting, and/or embossing.[26]

B. Arguments of the Parties

The APPC argues that the Commission's traditional domestic like product factors support defining a single domestic like product consisting of paper plates coextensive with the scope of the investigations. Specifically, the APPC asserts that all in-scope paper plates share the same basic physical characteristics and uses as tableware; utilize the same production processes, essentially cutting and forming paperboard into a plate shape using a mold; are sold through the same channels of distribution, mainly to retailers; have a high degree of interchangeability; are perceived to be a single product category that is distinct from other tableware products such as bowls and cups; and follow the same pricing trends.[27] The APPC maintains that in defining a single domestic like product, the Commission should not include out-of-scope liquid fiber paper plates because a clear line divides in-scope paper plates from out-of-scope liquid fiber paper plates.[28]

Acadian does not address the domestic like product definition.[29]

C. Analysis

Based on the following analysis, and in the absence of contrary party argument, we define a single domestic like product consisting of paper plates, coextensive with the scope of these investigations.[30]

Physical Characteristics and Uses. Paper plates within the scope may differ by shape, grade, size, coating, quantity, and patterns/colors, but all paper plates share the same general physical characteristics and uses.[31] All are produced from paper or paperboard.[32] In addition,

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[26] CR/PR at I-7-8.

[27] Petition at 12-13.

[28] APPC Postconference Br. at 6-11; Conference Tr. at 8 (Bay).

[29] *See generally* Acadian Postconference Br.

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

[31] Petition at 5-7, 12.

[32] Petition at 5; Conference Tr. at 12 (Biggins).

they are all used as tableware for any event where the plate is to be discarded after use, including at certain foodservice establishments and with takeout meals.[33]

The record indicates that while out-of-scope liquid fiber paper plates share similar end uses as in-scope paper plates (*i.e.*, as disposable tableware), they are produced using different raw materials.[34] Specifically, out-of-scope liquid fiber paper plates are produced from liquid pulp as opposed to the paperboard from which in-scope paper plates are produced.[35] In addition, out-of-scope liquid fiber paper plates, according to the APPC, are stronger and purportedly seen as a better option for heavier food than in-scope paper plates.[36] The APPC also claims that out-of-scope liquid fiber paper plates are more limited in their printing capabilities than in-scope paper plates.[37] In terms of physical characteristics and uses, a majority of responding U.S. producers and a plurality of responding U.S. importers reported that in-scope paper plates and out-of-scope liquid fiber paper plates are only "somewhat" comparable.[38]

Manufacturing Facilities, Production Processes, and Production Workers. All paper plates within the scope are produced using the same processes and inputs, involving: (1) the production of pulp; (2) the production of paperboard;[39] and (3) the conversion into paper plates.[40] Specifically, pulping breaks down wood or existing paper into its individual strands.[41] The pulp is then sprayed onto a moving mesh screen where water is removed through suction and squeegees.[42] The resulting sheet of paper is hot-rolled, pressed and squeezed into layers of paper, which are then combined and given a clay coating to provide strength, resulting in paperboard.[43] The paperboard is then placed on rolls and cut to specific widths. The paperboard is converted into paper plates by placing these rolls on a printing press to add any designs and printing, as well as any additional coatings for strength or liquid resistance.[44] They are then placed onto a production line where they are cut and pressed into the desired plate shape and size, and scored (indentations added) for structural stability. The cut and scored flat

[33] Petition at 7, 12.

[34] "Liquid fiber plates tend to be used for special occasions where customers may be more willing to pay a premium price." CR/PR at Table D-1.

[35] Acadian Postconference Br. at 6.

[36] APPC Postconference Br. at 6.

[37] APPC Postconference Br. at 7-6; Conference Tr. at 13 (Biggins), 30-31 (McDonough).

[38] CR/PR at Table I-2.

[39] Many paper plate producers do not produce pulp or paperboard, and must purchase paperboard as an input. CR/PR at I-9 n.17.

[40] CR/PR at I-9; Petition at 6, 12; Conference Tr. at 12 (Biggins).

[41] CR/PR at I-10; Petition at 6.

[42] CR/PR at I-10; Petition at 7.

[43] CR/PR at I-10; Petition at 7; Conference Tr. at 12 (Biggins).

[44] CR/PR at I-10-11; Petition at 7.

paper disc is molded into the finished paper plate product. Finally, the paper plates are collated, bagged, packaged, and shipped.[45] In addition to sharing the same production processes, all in-scope paper plates are produced in the same manufacturing facilities using the same production employees.[46]

The record indicates that out-of-scope liquid fiber paper plates are produced using different manufacturing facilities, production processes, and production workers than that of in-scope paper plates. Out-of-scope liquid fiber paper plates are made using liquid pulp, a process which requires different delivery systems and different machinery to form and cure the plate.[47] In addition, different production workers with different skills are utilized to operate the different machinery.[48] Consistent with this, all responding U.S. producers and the vast majority of U.S. importers reported that in-scope paper plates and out-of-scope liquid fiber paper plates are "never" comparable with respect to their manufacturing facilities, production processes, and employees.[49]

Interchangeability. The record indicates that all paper plates within the scope are used as disposable tableware, and are interchangeable.[50] Although out-of-scope liquid fiber paper plates may differ from in-scope paper plates in terms of their prints or strength, out-of-scope liquid fiber paper plates serve the same basic end use, *i.e.*, as disposable tableware, and are therefore generally interchangeable with in-scope paper plates. All responding U.S. producers and the vast majority of responding U.S. importers reported that in-scope paper plates and out-of-scope liquid fiber paper plates are "mostly" or "somewhat" interchangeable.[51]

Customer and Producer Perceptions. The APPC claims that customers and producers generally perceive paper plates within the scope to be a single product category, consisting of a broad range of specifications.[52] It further contends that out-of-scope liquid fiber paper plates, with their different attributes, are perceived by customers and producers to be a product different than in-scope paper plates.[53] With respect to producer and customer perceptions, all responding U.S. producers and all responding U.S. importers reported that in-scope paper plates and out-of-scope liquid fiber paper plates are only "somewhat" or "never" comparable.[54]

[45] CR/PR at I-11; Petition at 7.
[46] Petition at 12.
[47] APPC Postconference Br. at 7-8; Conference Tr. at 13 (Biggins), 18 (Novak), 28 (Daniel).
[48] APPC Postconference Br. at 8-9; Conference Tr. at 18 (Novak), 28-29 (Daniel), 29-30 (White).
[49] CR/PR at Table I-2.
[50] APPC Postconference Br. at 9-10; Petition at 13.
[51] CR/PR at Table I-2.
[52] Petition at 13.
[53] Conference Tr. at 13 (Biggins), 18 (Novak).
[54] CR/PR at Table I-2.

Channels of Distribution. Paper plates within the scope are sold through the same channels of distribution, mainly to retailers.[55] According to the APPC, out-of-scope liquid fiber paper plates also are sold mainly to retailers.[56] The majority of responding U.S. producers reported that in-scope paper plates and out-of-scope liquid fiber paper plates are "mostly" comparable with respect to their channels of distribution.[57] The majority of responding U.S. importers reported that they are "fully" or "mostly" comparable.[58]

Price. The prices of paper plates within the scope fall within a range depending on product features.[59] According to the APPC, out-of-scope liquid fiber paper plates sell at significantly higher prices than in-scope paper plates.[60] All responding U.S. producers and all responding U.S. importers reported that in-scope paper plates and out-of-scope liquid fiber paper plates are only "somewhat" or "never" comparable in terms of price.[61]

Conclusion. The record in the preliminary phase of these investigations indicates that all paper plates covered by the scope of these investigations share the same basic physical characteristics and uses, are manufactured using the same facilities, processes, and employees, and can be used interchangeably. Furthermore, all in-scope paper plates are sold primarily to retailers, and are generally perceived as a single category of products by customers and producers. In addition, in-scope paper plates are priced along a continuum.

While out-of-scope liquid fiber paper plates are similar to in-scope paper plates in some respects, namely, in terms of end uses and channels of distribution, and can generally be used interchangeably with in-scope paper plates, the record indicates that a clear dividing line exists between the two products. Out-of-scope liquid fiber paper plates and in-scope paper plates are produced from different raw materials using different manufacturing facilities, production processes, and production workers. Customers and producers perceive out-of-scope liquid fiber paper plates to be in a different product category than in-scope paper plates, and out-of-scope liquid fiber paper plates are priced at a premium to in-scope paper plates.

For the foregoing reasons, and the absence of any contrary argument, we define a single domestic like product consisting of all paper plates, coextensive with the scope of the investigations.

[55] CR/PR at Table II-1.
[56] APPC Postconference Br. at 9; Petition at 12-13.
[57] CR/PR at Table I-2.
[58] CR/PR at Table I-2.
[59] Petition at 13.
[60] Conference Tr. at 13 (Biggins), 18 (Novak).
[61] CR/PR at Table I-2.

IV. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[62] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[63] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[64]

In these investigations, two U.S. producers, *** and Unique Industries, are subject to possible exclusion under the related parties provision because each firm imported subject merchandise during the January 2020-September 2023 period of investigation ("POI").[65] In addition, *** reported that it is related to ***.[66] The APPC argues that appropriate circumstances do not exist to exclude either firm from the definition of the domestic industry,

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[62] 19 U.S.C. § 1677(4)(A).

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

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

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

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

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

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

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

[65] CR/PR at Tables III-10-11; Conference Tr. at 17 (Novak); APPC Postconference Br. at A3-A11.

[66] CR/PR at III-2; *** U.S. Producer Questionnaire Response at I-6. The record does not contain any other information regarding this relationship, including the percentage of ownership. Consequently, there is no information on the record concerning whether there is a sufficient degree of control between or over *** and *** for *** to qualify as a related party based on this affiliation.

and that the Commission should define the domestic industry as consisting of all U.S. producers of the domestic like product.[67] Acadian does not address this issue.[68] We analyze below whether appropriate circumstances exist to exclude either domestic producer under the related parties provision.

****.* *** accounted for *** percent of U.S. production of paper plates in 2022 and was the *** of the seven reporting U.S. producers that year in terms of U.S. production volume.[69] It ***.[70] *** imported subject merchandise from *** throughout the POI.[71] The ratio of *** subject imports to its domestic production was *** percent in 2020, *** percent in 2021, and *** percent in 2022; it was *** percent in January-September 2023 ("interim 2023"), compared with *** percent in January-September 2022 ("interim 2022").[72] *** indicates that it was ***. It further indicates that it imports ***.[73]

Given that *** is a ***, and its ratio of subject imports to domestic production remained very low throughout the POI, its primary interest appears to be in domestic production. Moreover, there is no indication in the record that including *** in the domestic industry would skew the data for the domestic industry or mask injury to the domestic industry. In light of this, and in the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

Unique Industries. Unique Industries accounted for *** percent of U.S. production of paper plates in 2022 and was the *** of the seven reporting U.S. producers that year in terms of U.S. production volume.[74] It is a member of the petitioning coalition.[75] Unique Industries reported importing subject merchandise from *** throughout the POI. Unique Industries' imports of subject merchandise during the POI totaled *** paper plates in 2020, *** paper plates in 2021, *** paper plates in 2022, and *** paper plates in interim 2023, compared with *** paper plates in interim 2022.[76] Unique Industries' U.S. production of paper plates decreased from *** paper plates in 2020 to *** paper plates in 2021, before increasing to *** paper plates in 2022; its U.S. production was *** paper plates in interim 2023, compared with *** paper plates in interim 2022.[77] The ratio of Unique Industries' subject imports to its domestic production was *** percent in 2020, *** percent in 2021, and *** percent in 2022; it

[67] APPC Postconference Br. at A3-A11.
[68] *See generally* Acadian Postconference Br.
[69] CR/PR at Table III-1.
[70] CR/PR at Table III-1.
[71] CR/PR at Table III-10.
[72] CR/PR at Table III-10.
[73] CR/PR at Table III-12; *** U.S. Importer Questionnaire Response at II-4.
[74] CR/PR at Table III-1.
[75] CR/PR at Table III-1.
[76] CR/PR at Table III-11.
[77] CR/PR at Table III-11.

was *** percent in interim 2023, compared with *** percent in interim 2022.[78] Unique Industries explains that it imported subject paper plates ***. It also imported ***.[79] Unique Industries' operating income to net sales ratio was *** than the domestic industry average in each full year of the POI and in both interim periods.[80] The firm reported capital expenditures of $*** in 2020, $*** in 2021, $*** in 2022, and $*** in interim 2023, compared with $*** in interim 2022.[81]

Unique Industries' ratio of subject imports to domestic production remained low throughout the 2020-2022 period as its domestic production fluctuated, but increased overall by more than its subject imports. Although its ratio of subject imports to domestic production was higher in interim 2023 compared with interim 2022, as its domestic production was lower while its subject imports were *** higher, its domestic production and capital investments remained substantial in interim 2023. This, along with its membership in the petitioning coalition, suggests that Unique Industries' primary interest is in domestic production.[82] There is also no information on the record that its *** shielded its operations from subject import competition.[83] Moreover, there is no indication that including Unique Industries in the domestic industry would skew the data for the domestic industry or mask injury to the domestic industry. Based on the foregoing, we find that appropriate circumstances do not exist to exclude Unique Industries from the domestic industry.

Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of paper plates.

V. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of

[78] CR/PR at Table III-12.

[79] CR/PR at Table III-12; Unique Industries U.S. Importer Questionnaire Response at II-4. It further indicates that ***. *See id.*

[80] Unique Industries' operating income to net sales ratio was *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023, compared with *** percent in interim 2022. CR/PR at Table VI-3.

[81] CR/PR at Table VI-5. Thus, Unique Industries made capital expenditures of $*** over the POI. *Id*.

[82] CR/PR at Table III-12. Unique Industries has also indicated that ***, further demonstrating its commitment to domestic production. APPC Postconference Br. at A-7.

[83] Indeed, Unique Industries reported *** throughout the POI while the industry as a whole reported operating income during the POI. Such results suggest it was not shielded from the effects of subject imports. CR/PR at Table VI-3.

all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.[84]

A. Arguments of the Parties

Petitioner's Arguments. The APPC argues that imports of paper plates from China, Thailand, and Vietnam exceed the negligibility threshold.[85] It asserts that to assess negligibility, the Commission should rely on adjusted official import statistics for HTSUS statistical reporting number 4823.69.0040, which is a basket category that includes in-scope paper plates and out-of-scope paper merchandise. In the APPC's view, the coverage provided in questionnaire data in the preliminary phase of the investigations is too low to provide a reliable basis for the Commission's negligibility analysis. The APPC maintains that notwithstanding this low coverage, the questionnaire responses provide information that could be used to adjust the official import statistics to remove out-of-scope merchandise. The APPC asserts that the adjusted official import statistics show that imports of paper plates from all three subject countries clearly are not negligible.[86]

Respondent's Arguments. Acadian asserts that the Commission should find that subject imports from Thailand and Vietnam are negligible and have no potential to imminently exceed the negligibility threshold.[87] As an initial matter, Acadian disputes the APPC's contention that HTS statistical reporting number 4823.69.0040 should be used in analyzing negligibility. According to Acadian, relying upon this HTS category is problematic because: (1) it includes a *** quantity of merchandise outside the scope of the investigations; and (2) substantial volumes of in-scope paper plates entered the United States under several other HTS statistical reporting numbers, including 4823.70, 4818.30, 4823.90, 4819.10, 4821.10, and 4809.20.[88] Acadian asserts that the questionnaire data is more *** and not distorted by product mix or classification issues, and advocates for its use for the Commission's negligibility calculations.[89] Acadian claims that the questionnaire data show that subject imports from Thailand and Vietnam fall well below the three percent negligibility threshold and that there is no likelihood that different import numbers will arise in the final phase of these investigations showing that they exceed the threshold.[90] In addition, Acadian asserts that there is no reasonable indication that subject imports from Thailand and Vietnam will imminently exceed the negligibility

[84] 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

[85] APPC Postconference Br. at 16-18; Petition at 15-17.

[86] APPC Postconference Br. at 16-18, Exhibit 4.

[87] Acadian Postconference Br. at 4-18.

[88] Acadian Postconference Br. at 7-11, Exhibits 3 and 4.

[89] Acadian Postconference Br. at 11.

[90] Acadian Postconference Br. at 11-15, Exhibits 5-7.

threshold, and that the Commission's investigations of paper plates from these countries should therefore be terminated.[91]

B. Analysis and Conclusion

In the preliminary phase of these investigations, official import statistics for paper plates are based on imports of paper plates under HTS statistical reporting number 4823.69.0040, which as previously noted is a basket category that includes imports of in-scope paper plates and out-of-scope products. The Commission adjusted the official import statistics for HTS statistical reporting number 4823.69.0040 to remove out-of-scope imports reported in the U.S. importer questionnaire responses. However, as both sides recognize, in-scope paper plates were imported under several other HTS statistical reporting numbers during the POI, and relying upon adjusted import statistics for HTS statistical reporting number 4823.69.0040 alone would not account for substantial imports of paper plates under the other HTS statistical reporting numbers.[92]

Given these limitations of the official import statistics, the questionnaire data appear to be a more reliable dataset for our negligibility analysis. Although questionnaire coverage of subject imports from China are lower than for subject imports from Thailand and Vietnam, the questionnaires collected data concerning all paper plate imports regardless of the HTS statistical reporting number used, and therefore offer more comprehensive coverage of the products covered by the scope than the adjusted official import statistics.[93] Moreover, while the low coverage of nonsubject imports afforded by the questionnaires would understate total imports to some extent, the same concern applies to coverage of imports from all sources when using adjusted import statistics for HTS statistical reporting number 4823.69.0040 due to the omission of subject imports under other HTS statistical reporting numbers. Given this, we rely on the questionnaire data as the best information available on the record of the preliminary phase of the investigations concerning the volume of imports from each subject country and the total volume of imports during the relevant 12-month period.[94]

Based on questionnaire data, during the most recent 12-month period for which data are available preceding the filing of the petitions on January 25, 2024, January 2023 through

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[91] Acadian Postconference Br. at 15-18.

[92] Conference Tr. at 8-9 (Bay) ("{W}e are now aware of subject imports entering the U.S. under other and, in our view, incorrect HTS codes"), 21 (Gordon) (Import Genius identifying "over six or eight additional HTS codes that appear to be being used to import paper plates"); Acadian Postconference Br. at 9 (stating that "extensive" quantities of paper plates entered under at least six other HTS subheadings).

[93] *Compare* CR/PR at Table IV-4 (questionnaire data reporting 3.6 billion paper plates imports between January-December 2023) to CR/PR at Table E-2 (adjusted import statistics reporting 98.4 million paper plate imports between January-December 2023).

[94] The report presents in Table E-2, an alternative calculation of import share data based on adjusted official import statistics for HTS statistical reporting number 4823.69.0040.

December 2023, subject imports from China accounted for *** percent of total imports of paper plates, subject imports from Thailand accounted for *** percent of total imports, and subject imports from Vietnam accounted for *** percent of total imports.[95] [96] As subject imports pertaining to all investigations are above the statutory threshold, we find that imports from China and Vietnam subject to antidumping and countervailing duty investigations, and imports from Thailand subject to the antidumping duty investigation, are not negligible. Therefore, we determine that there is no basis to terminate any of the investigations.

VI. Cumulation

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

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

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

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

(4) whether the subject imports are simultaneously present in the market.[97]

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for

[95] CR/PR at Table IV-4. Subject import volumes from China and Vietnam are the same with respect to the antidumping and countervailing duty investigations.

[96] We note that using the alternative dataset advocated by the APPC – adjusted official import statistics for HTS subheading 4823.69.0040 – subject imports from China, Thailand, and Vietnam are also above negligible levels at *** percent, *** percent, and *** percent, respectively. CR/PR at Table E-2.

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

determining whether the subject imports compete with each other and with the domestic like product.[98] Only a "reasonable overlap" of competition is required.[99]

A. Arguments of the Parties

Petitioner's Arguments. The APPC argues that the Commission should cumulate subject imports from China, Thailand, and Vietnam because all requirements for cumulation are satisfied.[100] Specifically, the APPC claims that it filed the petitions with respect to paper plate imports from all three subject countries on the same day and that paper plates from each subject country and the domestic like product compete with each other in the U.S. market. According to the APPC, because paper plates are a fungible commodity product, paper plates meeting particular specifications are interchangeable with each other regardless of source.[101] The APPC further asserts that U.S. producers and U.S. importers compete in the same geographic markets; sell product through the same channels of distribution, primarily to retailers; and were simultaneously present in the U.S. market during the POI.[102]

Respondent's Argument. Acadian does not address cumulation for purposes of the Commission's present material injury analysis.[103]

B. Analysis

We consider subject imports from China, Thailand, and Vietnam on a cumulated basis because the statutory criteria for cumulation appear to be satisfied. As an initial matter, the APPC filed the antidumping and countervailing duty petitions with respect to all three countries on the same day, January 25, 2024. The record also supports finding a reasonable overlap of competition among imports from all three subject countries, and between subject imports from each source and the domestic like product, for the reasons discussed below.

Fungibility. The record indicates that there is a substantial degree of fungibility between and among domestically produced paper plates and imports from each subject country. Most responding U.S. producers and importers reported that paper plates from domestic producers

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

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

[100] APPC Postconference Br. at 11-16; Petition at 18-21.

[101] APPC Postconference Br. at 12-14; Petition at 19.

[102] APPC Postconference Br. at 15; Petition at 19-20.

[103] *See generally* Acadian Postconference Br.

and each of the subject sources were "always" interchangeable with each other.[104] Furthermore, paper plates from each subject country overlapped with the domestic like product in terms of paper plate widths,[105] color,[106] and branding type.[107] In addition, and consistent with the APPC's claim that imports from subject and domestic sources are interchangeably marketed by large retailers under the same private label brands,[108] purchaser responses to the Commission's lost sales and lost revenues survey show that *** responding purchasers purchased paper plates from both domestic and subject sources.[109]

Channels of Distribution. Responding U.S. producers and importers of paper plates from all three subject countries reporting selling paper plates primarily to retailers.[110]

Geographic Overlap. Responding U.S. producers reported selling paper plates to all regions in the contiguous United States, as did importers of paper plates from the three subject

[104] CR/PR at Tables II-6 and II-7.

[105] In 2022, U.S. producers' shipments of paper plates that were >7.5 inches to ≤9.0 inches accounted for *** percent of their total shipments, paper plates that were >9.0 inches accounted for *** percent, and paper plates that were ≤7.5 inches accounted for *** percent. U.S. importers' U.S. shipments of paper plate imports from China that were >7.5 inches to ≤9.0 inches accounted for *** percent of their total shipments, paper plate imports that were >9.0 inches accounted for *** percent, and paper plate imports that were ≤7.5 inches accounted for *** percent. U.S. importers' U.S. shipments of paper plate imports from Thailand that were >7.5 inches to ≤9.0 inches accounted for *** percent of their total shipments, paper plate imports that were >9.0 inches accounted for *** percent, and paper plate imports that were ≤7.5 inches accounted for *** percent. U.S. importers' U.S. shipments of paper plate imports from Vietnam that were >7.5 inches to ≤9.0 inches accounted for *** percent, paper plate imports that were >9.0 inches accounted for *** percent, and paper plate imports that were ≤7.5 inches accounted for *** percent. CR/PR at Table IV-5.

[106] In 2022, U.S. producers' shipments of "other color" paper plates accounted for *** percent of their total shipments, while "solid white" paper plates accounted for *** percent. U.S. importers' U.S. shipments of "other color" paper plate imports from China accounted for *** percent of their total shipments, while "solid white" paper plate imports accounted for *** percent. U.S. importers' U.S. shipments of "other color" paper plate imports from Thailand and Vietnam accounted for *** percent of their total shipments. CR/PR at Table IV-6.

[107] In 2022, U.S. producers' shipments of private label paper plates accounted for *** percent of their total shipments, while branded paper plates accounted for *** percent. U.S. importers' U.S. shipments of private label paper plate imports from China accounted for *** percent of their total shipments, while branded paper plate imports accounted for *** percent. U.S. importers' U.S. shipments of private label paper plate imports from Thailand accounted for *** percent of their total shipments. U.S. importers' U.S. shipments of private label paper plate imports from Vietnam accounted for *** percent of their total shipments, while branded label paper plate imports accounted for *** percent. CR/PR at Table IV-7.

[108] APPC Postconference Br. at 12-14; Petition at 19.

[109] CR/PR at Table V-15.

[110] CR/PR at Table II-1.

countries.[111] Official import statistics also indicate that imports from each subject country entered the United States through overlapping borders of entry in 2022.[112]

Simultaneous Presence in Market. As reflected by the pricing data, the domestic like product was present in the U.S. market throughout the POI.[113] Imports from all three subject sources were also present in the U.S. market throughout the POI.[114]

Conclusion. The record of the preliminary phase of these investigations indicates that subject imports from China, Thailand, and Vietnam are fungible with the domestic like product and each other. It also indicates that imports from each of the subject countries and the domestic like product were sold in overlapping channels of distribution and geographic markets and were simultaneously present in the U.S. market during the POI. Because there appears to be a reasonable overlap of competition between and among subject imports from China, Thailand, Vietnam and the domestic like product, we cumulate subject imports from these sources for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

VII. Reasonable Indication of Material Injury by Reason of Subject Imports

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[115] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[116] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[117] In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant

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

[112] CR/PR at Table IV-8. Imports from all three subject countries entered through ports in the East, West, and South. Imports from China and Thailand also entered through ports in the North. *See id.*

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

[114] CR/PR at Table IV-9. Subject imports from China and Vietnam were reported in all months of the POI. Subject imports from Thailand were reported in 9 out of 12 months in 2020, 6 out of 12 months in 2021, all 12 months in 2022, and all but one month in interim 2023. *See id.*

[115] 19 U.S.C. §§ 1671b(a), 1673b(a).

[116] 19 U.S.C. § 1677(7)(B). The Commission "may consider such other economic factors as are relevant to the determination" but shall "identify each {such} factor ... and explain in full its relevance to the determination." 19 U.S.C. § 1677(7)(B).

[117] 19 U.S.C. § 1677(7)(A).

economic factors that bear on the state of the industry in the United States.[118] No single factor is dispositive, and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[119]

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[120] it does not define the phrase "by reason of," indicating that this aspect of the injury analysis is left to the Commission's reasonable exercise of its discretion.[121] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[122]

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.[123] In performing its examination, however, the Commission need not isolate

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[118] 19 U.S.C. § 1677(7)(C)(iii).

[119] 19 U.S.C. § 1677(7)(C)(iii).

[120] 19 U.S.C. §§ 1671b(a), 1673b(a).

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

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

[123] SAA at 851-52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. 96-249 at 75 (1979) (the Commission "will consider information which indicates that harm is caused by factors other than less-

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the injury caused by other factors from injury caused by unfairly traded imports.[124] Nor does the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[125] It is clear that the existence of injury caused by other factors does not compel a negative determination.[126]

Assessment of whether material injury to the domestic industry is "by reason of" subject imports "does not require the Commission to address the causation issue in any particular way" as long as "the injury to the domestic industry can reasonably be attributed to the subject imports."[127] The Commission ensures that it has "evidence in the record" to "show that the

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(…Continued)
than-fair-value imports."); H.R. Rep. 96-317 at 47 (1979) ("in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;" those factors include "the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry"); *accord Mittal Steel*, 542 F.3d at 877.

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

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

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

[127] *Mittal Steel*, 542 F.3d at 876, 878; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology."), *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its (Continued…)

harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports." [128] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[129]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.[130] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[131]

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is a reasonable indication of material injury or threat of material injury by reason of cumulated subject imports.

1. Demand Conditions

Paper plates are used as tableware for casual dinners, picnics, large formal gatherings or any event where the paper plate is to be discarded after eating.[132] According to the APPC, U.S. demand depends mainly on demand in the retail and restaurant/food service (delivery and takeout) sectors.[133] Such activity, the APPC maintains, is affected by seasonality, increasing in the spring and summer months and also around Thanksgiving and the winter holidays.[134] Consistent with the APPC's claims, most responding U.S. producers and importers reported that

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(…Continued)
decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

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

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

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

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

[132] CR/PR at I-7.

[133] APPC Postconference Br. at 22; Petition at 22.

[134] Hearing Tr. at 87 (Biggins), 87 (Epstein), 88 (Novak).

the U.S. paper plate market is subject to seasonality with higher demand in the late spring and summer and/or during the November and December holiday seasons.[135]

In addition, the APPC asserts that U.S. demand for paper plates spiked in the retail sector due to the COVID-19 pandemic and that it generally increased across all sectors over the POI.[136] It anticipates this trend to continue over the next ten years as the global disposable plates market grows and as consumer awareness of environmental issues and regulatory actions shift demand away from products made from plastic or Styrofoam to products made of more environmentally friendly and sustainable/recyclable materials.[137] Most responding U.S. producers and importers agree that U.S. demand for paper plates has increased since January 1, 2020.[138]

Apparent U.S. consumption by quantity increased by 1.3 percent between 2020 and 2022, increasing from 52.6 billion paper plates in 2020 to 53.2 billion paper plates in 2021 and 53.3 billion paper plates in 2022.[139] It was lower at 38.3 billion paper plates in interim 2023, compared with 39.7 billion paper plates in interim 2022.[140]

2. Supply Conditions

The domestic industry was the largest supplier to the U.S. market throughout POI, although its share of apparent U.S. consumption declined. The industry's U.S. shipments as a share of apparent U.S. consumption fell from 99.5 percent in 2020 to 98.6 percent in 2021 and 95.1 percent in 2022.[141] Its market share was lower at 94.5 percent in interim 2023, compared with 95.1 percent in interim 2022.[142]

Several domestic producers made substantial capital expenditures to expand their practical production capacity over the POI.[143] Collectively, the domestic industry's practical production capacity increased by 11.3 percent between 2020 and 2022, increasing from 69.8 billion paper plates in 2020 to 73.5 billion paper plates in 2021 and 77.0 billion paper plates in 2022.[144] [145] The industry's practical production capacity, however, was lower at 56.6 billion

[135] CR/PR at II-8.
[136] APPC Postconference Br. at 22; Petition at 22; Conference Tr. at 74 (Cappell).
[137] APPC Postconference Br. at 22; Petition at 22-23; Conference Tr. at 74 (Cappell).
[138] CR/PR at Table II-4.
[139] CR/PR at Tables IV-10 and C-1.
[140] CR/PR at Tables IV-10 and C-1.
[141] CR/PR at Tables IV-10 and C-1.
[142] CR/PR at Tables IV-10 and C-1.
[143] CR/PR at Tables III-3 and VI-6.
[144] CR/PR at Tables III-4 and C-1. During this time period, *** increased its practical production capacity by nearly *** paper plates, and accounted for ***. CR/PR at III-5 n.5.

paper plates in interim 2023, compared with 57.4 billion paper plates in interim 2022.[146] The domestic industry operated at practical capacity utilization rates ranging between 67.7 and 76.5 percent throughout the POI.[147]

Subject imports were the second-largest source of supply to the U.S. market, gaining market share during the POI. Their share of apparent U.S. consumption increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022.[148] Their market share was higher at *** percent in interim 2023, compared with *** percent in interim 2022.[149]

Nonsubject imports were the smallest source of supply to the U.S. market, accounting for *** percent market share throughout the POI.[150]

All seven domestic producers reported that they had experienced COVID-related supply constraints since January 1, 2020, which included labor shortages in 2020 and paperboard shortages in 2021 and 2022 during which some domestic producers were forced to put customers on allocation.[151] Domestic producers state that these challenges were mostly resolved by late 2022.[152] Most importers (eight of 14) reported that they had not experienced supply constraints since January 1, 2020. Of the six importers that reported that they had experienced such constraints, four were retailers (***) that generally referred to supply issues from domestic producers.[153]

(…Continued)

[145] Practical production capacity takes into account factors including existing labor force, availability of material inputs, and actual number of shifts and hours operated. See Blank U.S. Producer Questionnaire at II-3a, EDIS Doc. 812836.

[146] CR/PR at Tables III-4 and C-1. *** reported that it ***. It explained that ***. CR/PR at Table III-5.

[147] The domestic industry's practical capacity utilization rate was *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023, compared with *** percent in interim 2022. CR/PR at Table III-4.

[148] CR/PR at Tables IV-10 and C-1. Thus, the subject imports' market share increased by *** percentage points from 2020 to 2022. *Id*.

[149] CR/PR at Tables IV-10 and C-1. Accordingly, the subject imports' market share was *** percentage points higher in interim 2023 compared to interim 2022. *Id*.

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

[151] CR/PR at II-7; Conference Tr. at 13-14 (Biggins), 16-17 (Novak), 75 (Epstein), 75 (Biggins), 75-76 (Novak). In their questionnaire responses, customer allocations, reduced supply, and/or declining to accept new customers were reported by ***. CR/PR at II-7, Table III-5. *** reported constraints due to ***. CR/PR at Table III-5.

[152] CR/PR at Table III-5; Conference Tr. at 17 (Novak), 36 (Epstein), 44-45 (Epstein), 44 (Novak), 45 (Biggins), 46 (Holt).

[153] CR/PR at II-6-8.

3. Substitutability and Other Conditions

Based on the record of the preliminary phase of these investigations, we find that there is a moderate-to-high degree of substitutability between domestically produced paper plates and subject imports.[154] Most responding U.S. producers and importers reported that paper plates from domestic producers and each of the subject sources were "always" interchangeable.[155] Differences in some factors such as availability, however, may have limited substitutability to some extent during the POI.[156]

The current record also indicates that price is an important factor in purchasing decisions for paper plates, along with availability and quality. Purchasers responding to the lost sales/lost revenue survey most frequently cited availability/supply and price/cost as their top three purchasing factors, followed by quality/selection.[157] Most domestic producers indicated that differences other than price were never significant in sales of the domestic like product and subject imports from each source.[158] Importers' responses were mixed, with a majority reporting that differences other than price were at least "sometimes" significant.[159]

U.S. producers and importers primarily sold paper plates from their inventories. Domestic producers reported that 65.8 percent, approximately two-thirds, of their commercial shipments were from inventory, with lead times averaging nine days. The remaining 34.2 percent of their commercial shipments were produced-to-order, with lead times averaging 19 days.[160] In contrast, responding U.S. importers reported that 93.9 percent of their commercial shipments were from inventories, with lead times averaging seven days. The remaining 6.1 percent of their commercial shipments were produced-to-order, with lead times averaging 116 days.[161]

U.S. producers reported selling a plurality of their paper plates in the spot market, while U.S. importers reported selling most of their paper plates through long-term contracts.[162] U.S. producers' spot sales accounted for *** percent of their commercial U.S. shipments, while long-term contracts accounted for *** percent, annual contracts accounted for *** percent,

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

[155] CR/PR at Tables II-6 and II-7.

[156] CR/PR at II-10, II-13-14. Some importers and purchasers described factors other than price, especially availability, as important and a reason why they imported or purchased subject imports. *See id.*; *see also* Acadian Postconference Br. at 21-24.

[157] CR/PR at Table II-5.

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

[159] CR/PR at Table II-9. Several importers reported that availability and quality were significant factors in their sales or purchases from different sources. CR/PR at II-13-14.

[160] CR/PR at II-11.

[161] CR/PR at II-11.

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

and short-term contracts accounted for *** percent. In contrast, U.S. importers' spot sales accounted for only *** percent of their commercial U.S. shipments, while long-term contracts accounted for *** percent, annual contracts accounted for *** percent, and short-term contracts accounted for *** percent.[163] U.S. producers' and importers' contracts generally fixed price but not quantity, with some contracts allowing for price renegotiation.[164]

Paperboard is the principal raw material used to produce paper plates.[165] According to the producer price index ("PPI") for paperboard, paperboard prices increased by 28 percent between January 2020 and September 2023. Specifically, the PPI shows that paperboard prices were mostly flat in 2020, increased from September 2020 to November 2022 to a level 38 percent above prices in January 2020, and then decreased after November 2022.[166] Domestic producers also reported increases in their raw material costs during the POI.[167] Raw materials accounted for the largest share of the domestic industry's cost of goods sold ("COGS") for paper plates throughout the POI, ranging from *** percent to *** percent during 2020-2022; they accounted for *** percent of the industry's COGS in interim 2023, compared with *** percent in interim 2022.[168]

Effective September 24, 2018, paper plates from China were subject to an additional 10 percent *ad valorem* duty under section 301 of the Trade Act of 1974. On May 10, 2019, the section 301 duty for paper plates was increased to 25 percent.[169]

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[170]

Cumulated subject imports, by volume, increased *** percent between 2020 and 2022, increasing from *** paper plates in 2020 to *** paper plates in 2021 and *** paper plates in 2022; cumulated subject imports were *** percent higher at *** paper plates in interim 2023, compared with *** paper plates in interim 2022.[171]

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

[164] CR/PR at V-5-6.

[165] CR/PR at V-1.

[166] CR/PR at V-1.

[167] CR/PR at Table VI-1. Domestic producers' unit cost of raw materials increased from $*** per 1,000 paper plates in 2020 to $*** per 1,000 paper plates in 2021 and $*** per 1,000 paper plates in 2022; they were higher at $*** per 1,000 paper plates in interim 2023, compared with $*** per 1,000 paper plates in interim 2022. *Id.*

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

[169] CR/PR at I-7 n.12.

[170] 19 U.S.C. § 1677(7)(C)(i).

[171] CR/PR at IV-2, Table IV-2.

Cumulated subject imports as a share of apparent U.S. consumption increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, for an overall increase of *** percentage points.[172] Their share was *** percentage points higher in interim 2023, at *** percent, than in interim 2022, at *** percent.[173]

Accordingly, based on the record in the preliminary phase of these investigations, we find that the increase in cumulated subject imports over the POI and their consequent volume toward the end of the POI are significant both in absolute terms and relative to consumption in the United States.

D. Price Effects of the Subject Imports

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

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[174]

As discussed in section VII.B.3 above, we find that there is a moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, and that price is an important factor in purchasing decisions, along with availability and quality.

We have examined several sources of data in our underselling analysis, including pricing data, import purchase cost data, and purchasers' responses to the lost sales/lost revenue survey. With respect to pricing data, the Commission collected quarterly quantity and f.o.b. value data on sales of four pricing products shipped by U.S. producers and importers to unrelated U.S. customers during the POI.[175] Seven U.S. producers and two importers provided usable pricing data for sales of the requested products, although not all firms reported pricing

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[172] CR/PR at Tables IV-10 and C-1.

[173] CR/PR at Tables IV-10 and C-1.

[174] 19 U.S.C. § 1677(7)(C)(ii).

[175] CR/PR at V-6. The four pricing products are: (1) Product 1 – 8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale; (2) Product 2 – 8.375" – 8.75" round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale; (3) Product 3 – 10.0" – 10.25" round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale; and (4) Product 4 – 7.0" round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale. *Id*.

for all products for all quarters.[176] The pricing data reported by these firms accounted for approximately 18.5 percent of U.S. producers' U.S. commercial shipments of domestically produced paper plates, *** percent of U.S. commercial shipments of subject imports from China, *** percent of U.S. commercial shipments of subject imports from Thailand, and *** percent of U.S. commercial shipments of subject imports from Vietnam in 2022.[177]

The pricing data show that cumulated subject imports undersold the domestic like product in 7 of 21 quarterly comparisons, or 33.3 percent, with underselling margins ranging from 0.1 percent to 15.9 percent, and averaging 6.1 percent.[178] Cumulated subject imports oversold the domestic like product in the remaining 14 quarterly comparisons, or 66.7 percent, with overselling margins ranging from 0.2 percent to 45.8 percent, and averaging 8.7 percent.[179] Quarters in which there was underselling accounted for 36.2 percent of total reported cumulated subject import sales volume (72.4 million paper plates) covered by the Commission's pricing data during the POI, and quarters in which there was overselling accounted for 63.8 percent of total reported cumulated subject import sales volume (127.6 million paper plates).[180]

The Commission also collected import purchase cost data for the same four pricing products from firms that imported these products from subject sources for retail sale.[181] Purchase cost data was reported by one firm, ***, and accounted for *** percent of subject imports from China in 2022.[182] The import purchase cost data show that the landed duty-paid ("LDP") costs for subject imports were below the sales price for the domestic like product in 9 of 14 quarterly comparisons, or 64.3 percent, at price-cost differentials ranging from 3.0 percent to 13.1 percent, and averaging 8.2 percent.[183] LDP costs for subject imports were higher than the sales price for the domestic like product in the remaining 5 quarterly comparisons, or 35.7 percent, at price-cost differentials ranging from *** percent to *** percent, and averaging *** percent.[184] There were *** paper plates from China in the quarters where subject imports had lower LDP costs than the sales price of the domestic product, and there were *** paper plates from China in the quarters where subject imports had higher LDP

[176] CR/PR at V-7.
[177] CR/PR at V-7.
[178] CR/PR at Table V-11.
[179] CR/PR at Table V-11.
[180] CR/PR at Table V-11.
[181] CR/PR at V-15 and Table V-13. We note that the volume of subject imports in the purchase cost data is more than *** the volume of subject imports in the pricing data. CR/PR at Tables V-11, V-13 (showing *** paper plates in the pricing data and *** paper plates in the purchase cost data).
[182] CR/PR at V-15.
[183] CR/PR at Table V-13.
[184] CR/PR at Table V-13.

costs.[185] Thus, on a volume basis, *** percent of subject imports reported in the purchase costs data had a lower LDP cost than the price of the domestic like product.

We recognize that the import purchase cost data may not reflect the total cost of importing and therefore requested that importers for retail sale provide additional information regarding the costs and benefits of directly importing paper plates. The one importer providing import purchase cost data, ***, reported that it incurred additional costs of *** percent beyond the LDP costs associated with importing paper plates.[186] Given that subject import costs were on average 8.2 percent below domestic sales prices, as noted above, the inclusion of the additional costs of *** percent would still leave the cost of importing subject imports frequently below domestic sales prices.[187]

The pricing and purchase cost data show that as the volume of cumulated subject imports increased over the POI, the number of quarterly instances in which prices and purchase costs of cumulated subject imports were lower than prices of the domestic like product also increased. Specifically, the pricing data show that the percentage of quarterly comparisons involving underselling increased from 50.0 percent in 2020 to 55.6 percent in interim 2023.[188] The volume of cumulated subject imports in quarterly comparisons in which there was underselling increased from *** paper plates in 2020 to *** paper plates in interim 2023.[189] Similarly, the purchase cost data show that the percentage of quarterly comparisons involving lower cumulated subject import purchase costs increased from 0.0 percent in 2021 to 100.0 percent in interim 2023.[190] The volume of cumulated subject imports in quarterly comparisons

[185] CR/PR at Table V-13.

[186] CR/PR at V-15. Reported additional costs included ***. *See id.*

[187] CR/PR at V-15. *** estimated that it saved *** percent of the purchase price by importing paper plates rather than purchasing from a U.S. producer or importer. *See id.* It further explained that the benefits of importing paper plates directly instead of purchasing from U.S. producers or importers included ***. *See id.*

[188] Derived from CR/PR at Tables V-4 to V-7. Cumulated subject imports undersold the domestic like product in one of two quarterly comparisons in 2020, one of four quarterly comparisons in 2021, zero of six quarterly comparisons in 2022, and five of nine quarterly comparisons in interim 2023. *See id.*

[189] Derived from CR/PR at Tables V-4 through V-7. The percentage of subject imports by volume involved in underselling comparisons was *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023. *See id.*

[190] Derived from CR/PR at Tables V-8 and V-9. No purchase cost data were reported for 2020. Cumulated subject import purchase costs were lower than domestic prices in zero of four quarterly comparisons in 2021, six of seven quarterly comparisons in 2022, and all three quarterly comparisons in interim 2023. *See id.*

in which purchase costs were lower than domestic prices increased from *** paper plates in 2021 to *** paper plates in interim 2023.[191]

We have also considered purchasers' responses to the lost sales/lost revenue survey. Seven of the eight responding purchasers reported that since 2020, they had purchased subject imports instead of the domestic like product. All seven of these purchasers reported that subject imports were priced lower than the domestic like product.[192]

In light of the foregoing, including the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product and the importance of price in purchasing decisions, we find for purposes of the preliminary phase of these investigations, that cumulated subject imports significantly undersold the domestic like product during the POI. The underselling caused the domestic industry to lose sales and market share to cumulated subject imports during the POI.[193]

We have also examined price trends during the POI. Between the first quarter of 2020 and the third quarter of 2023, the domestic industry's sales prices for paper plates increased overall. The industry's sales price increases ranged from *** percent to *** percent, depending on the product.[194] Due to the lack of quarterly pricing and purchase cost data of subject imports across the POI, there are no price or purchase cost trends for cumulated subject imports available on the record of the preliminary phase of these investigations.[195]

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[191] Derived from CR/PR at Tables V-8 and V-9. The percentage of subject imports by volume in which their purchase costs were lower than the domestic like product was *** percent in 2021, *** percent in 2022, and *** percent in interim 2023. *See id.*

[192] CR/PR at V-24. None of the purchasers reported that price was a primary reason for their purchases of subject imports instead of the domestic like product. *See id.* Purchasers identified ***. CR/PR at Table V-16.

[193] As noted above, cumulated subject imports gained *** percentage points of market share from 2020 to 2022 and *** percentage points of market share in interim 2023 compared to interim 2022 at the expense of the domestic industry. CR/PR at Table IV-10. As discussed below, the domestic industry experienced supply constraints during the POI, which Acadian argues pulled subject imports into the market. Acadian Postconference Br. at 21-24. The APPC maintains that all domestic industry supply constraints ended in 2022 and that the industry had capacity to supply the entirety of apparent U.S. consumption, but lost sales and market share to subject imports on the basis of price. APPC Postconference Br. at 23; Conference Tr. at 6-7 (Bay). The record also shows that the domestic industry had substantial excess practical capacity and increasing end-of-period inventories over the POI with which it could have supplied more product to the U.S. market. CR/PR at Tables III-4 and III-9. Nonetheless, in any final phase of these investigations, we intend to further investigate the extent to which subject imports may have gained market share during the POI due to the domestic industry's supply constraints.

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

[195] CR/PR at Table V-10. For pricing product 3, prices of subject imports from China increased between the third quarter of 2020 and the second quarter of 2022 while prices of subject imports from Thailand and Vietnam declined from the third quarter of 2022 to the third quarter of 2023. CR/PR at (Continued…)

We have also considered whether cumulated subject imports prevented price increases for domestically produced paper plates which otherwise would have occurred to a significant degree. The domestic industry's ratio of COGS to net sales decreased by 1.8 percentage points between 2020 and 2022, from 79.5 percent in 2020 to 77.7 percent in 2021 and 2022.[196] This occurred as the domestic industry's increases in unit net sales values exceeded its increases in unit COGS.[197] Between 2020 and 2022, the domestic industry's unit COGS increased by $9.57 per 1,000 paper plates, or by 30.8 percent, while its unit net sales value increased by more, $13.23 per 1,000 paper plates, or by 33.8 percent.[198] In interim 2023, the domestic industry's ratio of COGS to net sales was higher at 79.8 percent, compared with 78.0 percent in interim 2022, as the increase in its COGS outpaced the increase in its net sales value.[199] The domestic industry's unit COGS was higher by $5.51 per 1,000 plates, or by 13.9 percent, in interim 2023 than in interim 2022, while its unit net sales value was higher by $5.77, or by 11.3 percent.[200] In any final phase of the investigations, we will further investigate the extent to which subject imports may be affecting domestic prices.[201]

In sum, based on the preliminary phase of these investigations, we find that cumulated subject imports significantly undersold the domestic like product and gained market share at the direct expense of the domestic industry. Therefore, we find that cumulated subject imports had significant price effects.

(…Continued)
Table V-6. For pricing product 4, prices of subject imports from China increased from the first quarter of 2023 to the third quarter of 2023. CR/PR at Table V-7. For pricing product 1, purchase costs of subject imports from China remained the same from the second quarter of 2022 to the third quarter of 2023. CR/PR at Table V-8. For pricing product 2, purchase costs of subject imports from China increased from the first quarter of 2021 to the third quarter of 2023. CR/PR at Table V-9.

[196] CR/PR at Tables VI-1 and C-1.

[197] CR/PR at VI-15.

[198] CR/PR at Tables VI-2 and C-1. Raw material costs increased by $7.69 per 1,000 paper plates, or 37.7 percent, from 2020 to 2022; labor costs increased by $1.44 per 1,000 paper plates, or 43.2 percent; and other factory costs increased by $0.45 per 1,000 paper plates, or 6.1 percent.

[199] CR/PR at VI-15, Tables VI-1 and C-1.

[200] CR/PR at Tables VI-2 and C-1. Raw material costs were higher by $1.47, or 5.3 percent, in interim 2023 than in interim 2022; direct labor costs were higher by $0.64, or 14.1 percent; and other factory costs were higher by $3.40, or 44.6 percent. *See id.* The increase in the industry's other factory costs was ***. CR/PR at VI-14 n.9.

[201] Six of seven domestic producers reported that they had to reduce prices and four reported that they had to roll back announced price increases. CR/PR at V-23. Of the eight purchasers responding to the lost sales/lost revenue survey, two reported that U.S. producers had reduced prices by seven to 14 percent to compete with lower-priced subject imports. ***. ***. CR/PR at Table V-18.

E. Impact of the Subject Imports[202]

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development ("R&D"), and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[203]

As apparent U.S. consumption increased from 2020 to 2022, the domestic industry's performance improved by most measures, but its capacity utilization, U.S. shipments, and market share declined. Despite the domestic industry investing in additional capacity to satisfy increasing demand and the resolution of its COVID-related supply constraints, the industry lost market share to increasing volumes of low-priced cumulated subject imports during the period. Its performance was worse by most measures across the interim periods as cumulated subject imports continued to increase and take market share.

The industry's practical capacity increased by 11.3 percent between 2020 and 2022, increasing from 69.2 billion paper plates in 2020 to 72.9 billion paper plates in 2021 and 77.0 billion paper plates in 2022; it was lower at 56.0 billion paper plates in interim 2023, compared with 56.9 billion paper plates in interim 2022.[204] The domestic industry's production quantity increased by 2.0 percent between 2020 and 2022, increasing from 52.0 billion paper plates in 2020 to 52.7 billion paper plates in 2021 and 53.1 billion paper plates in 2022; production was lower at 35.4 billion paper plates in interim 2023, compared with 39.9 billion paper plates in interim 2022.[205] The industry's capacity utilization decreased by 6.3 percentage points between 2020 and 2022, decreasing steadily from 75.2 percent in 2020 to 72.2 percent in 2021 and 68.9 percent in 2022; capacity utilization was lower at 63.2 percent in interim 2023, compared with 70.1 percent in interim 2022.[206]

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[202] In its notice initiating the antidumping duty investigations, Commerce initiated the investigations based on estimated dumping margins of 154.57 to 178.80 percent for subject imports from China; 61.03 to 73.17 percent for subject imports from Thailand; and 153.09 to 165.27 percent for subject imports from Vietnam. *Certain Paper Plates from the People's Republic of China, Thailand, and the Socialist Republic of Vietnam: Initiation of Antidumping Duty Investigations*, 89 Fed. Reg. 14,046, 14,050 (Feb. 26, 2024).

[203] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act ("TPEA") of 2015, Pub. L. 114-27.

[204] CR/PR at Tables III-4 and C-1.

[205] CR/PR at Tables III-4 and C-1.

[206] CR/PR at Tables III-4 and C-1.

The domestic industry's number of production and related workers ("PRWs") increased by *** percent from 2020 to 2022, increasing from *** PRWs in 2020 to *** PRWs in 2021 and *** PRWs in 2022; it was lower at *** PRWs in interim 2023, compared with *** PRWs in interim 2022.[207] Hours worked increased by *** percent between 2020 and 2022, increasing from *** hours in 2020 to *** hours in 2021 and *** hours in 2022; hours worked were lower at *** hours in interim 2023, compared with *** hours in interim 2022.[208] Wages paid increased by *** between 2020 and 2022, rising from $*** in 2020 to $*** in 2021 and $*** in 2022; wages paid were lower at $*** in interim 2023, compared with $*** in interim 2022.[209] Productivity (in plates per hour) decreased by *** percent between 2020 and 2022, decreasing from *** plates per hour in 2020 to *** plates per hour in 2021 and *** plates per hour in 2022; productivity was lower at *** plates per hour in interim 2023, compared with *** plates per hour in interim 2022.[210]

The domestic industry's U.S. shipments fluctuated but decreased overall by 3.0 percent from 2020 to 2022, increasing from 52.3 billion paper plates in 2020 to 52.5 billion paper plates in 2021, before decreasing to 50.7 billion paper plates in 2022; U.S. shipments were lower at 36.2 billion paper plates in interim 2023, compared with 37.8 billion paper plates in interim 2022.[211] The industry's share of apparent U.S. consumption declined by 4.3 percentage points between 2020 and 2022, decreasing from 99.5 percent in 2020 to 98.6 percent in 2021 and 95.1 percent in 2022.[212] Its market share was lower at 94.5 percent in interim 2023, compared with 95.1 percent in interim 2022.[213]

The domestic industry's end-of-period inventories increased by *** percent between 2020 and 2022, increasing from *** paper plates in 2020 and 2021 to *** paper plates in 2022; they were lower at *** paper plates in interim 2023, compared with *** paper plates in interim 2022.[214] As a ratio to total shipments, the domestic industry's end-of-period inventories increased by *** percentage points, increasing from *** percent in 2020 and 2021 to *** percent in 2022; the ratio was lower at *** percent in interim 2023, compared with *** percent in interim 2022.[215]

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[207] CR/PR at Tables III-13 and C-1.

[208] CR/PR at Tables III-13 and C-1.

[209] CR/PR at Tables III-13 and C-1.

[210] CR/PR at Tables III-13 and C-1.

[211] CR/PR at Tables III-8 and C-1.

[212] CR/PR at Tables IV-10 and C-1.

[213] CR/PR at Tables IV-10 and C-1. Thus, the domestic industry's share of apparent U.S. consumption was 0.6 percentage points lower in interim 2023 compared to interim 2022. *Id*.

[214] CR/PR at Tables III-9 and C-1.

[215] CR/PR at Table III-9.

The domestic industry's financial performance improved from 2020 to 2022, but declined in interim 2023 compared with interim 2022 according to most indicators. The industry's net sales revenues increased by 29.8 percent between 2020 and 2022, rising from $2.1 billion in 2020 to $2.3 billion in 2021 and $2.7 in 2022; the industry's net sales revenues were higher at $2.1 billion in interim 2023, compared with $1.9 billion in interim 2022.[216]

The domestic industry's gross profit increased by 41.2 percent between 2020 and 2022, increasing from $420.5 million in 2020 to $501.2 million in 2021 and $593.6 in 2022; the industry's gross profit was lower at $414.9 million in interim 2023, compared with $423.7 million in interim 2022.[217] The industry's operating income increased by 53.2 percent between 2020 and 2022, increasing from $282.0 million in 2020 to $ in 2021 and $354.3 million in 2022; the domestic industry's operating income was lower at $274.0 million in interim 2023, compared with $304.7 million in interim 2022.[218] Its net income also increased by *** percent between 2020 and 2022, increasing from $*** in 2020 to $*** in 2021 and $*** in 2022; the domestic industry's net income was lower at $*** in interim 2023, compared with $*** in interim 2022.[219]

The domestic industry's ratio of operating income to net sales increased by 2.5 percentage points between 2020 and 2022, increasing from 13.7 percent in 2020 to 15.7 percent in 2021 and 16.2 percent in 2022; it was lower at 13.3 percent in interim 2023, compared with 15.8 percent in interim 2022.[220] The industry's net income margin increased by *** percentage points, increasing from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was lower at *** percent in interim 2023, compared with *** percent in interim 2022.[221] The domestic industry's net assets increased by 47.9 percent between 2020 and 2022, rising from $599.5 million in 2020 to $715.1 million in 2021 and $886.8 million in 2022.[222] The industry's return on assets increased from 47.0 percent in 2020 to 49.5 percent in 2021, before decreasing to 48.7 percent in 2022.[223]

The domestic industry made substantial capital investments during the POI on capacity expansions and machine purchases.[224] The industry's capital expenditures fluctuated but decreased overall by *** percent between 2020 and 2022, decreasing from $*** in 2020 to $*** in 2021, before increasing to $*** in 2022; capital expenditures were higher at $*** in

[216] CR/PR at Tables VI-1 and C-1.
[217] CR/PR at Tables VI-1 and C-1.
[218] CR/PR at Tables VI-1 and C-1.
[219] CR/PR at Tables VI-1 and C-1.
[220] CR/PR at Tables VI-1 and C-1.
[221] CR/PR at Tables VI-1 and C-1.
[222] CR/PR at Tables VI-9 and C-1.
[223] CR/PR at Table VI-10.
[224] CR/PR at Tables VI-5 and VI-6.

interim 2023, compared with $*** in interim 2022.[225] The domestic industry's R&D expenses decreased by *** percent between 2020 and 2022, decreasing from $*** in 2020 to $*** in 2021 and $*** in 2022; the industry's R&D expenses were $*** in interim 2023, compared with $*** in interim 2022.[226]

The record of the preliminary phase of these investigations indicates that cumulated subject imports increased by *** percent from 2020 to 2022 and entered increasingly at prices that were lower than domestic prices, capturing *** percentage points of market share from the domestic industry.[227] Although the domestic industry experienced supply constraints and put customers on allocation during this time, the record shows that the domestic industry's practical capacity utilization rate declined throughout the POI and domestic producers reported an increasing volume of end-of-period inventories. Even after resolution of most of the domestic industry's supply constraints by late 2022,[228] and the industry's investments to expand capacity to meet growing demand, lower-priced cumulated subject imports continued to increase and captured additional market share from the domestic industry in interim 2023 as compared to interim 2022, causing the industry's performance to decline by most measures.[229] Further, all but one domestic producer reported that subject imports had negative effects on their investment, growth, and/or development.[230] ***, ***, and ***.[231] Moreover, given that the domestic industry lost market share to the subject imports over the POI, its overall condition, as measured by the industry's trade and financial indicators, would have improved were it not for the increasing presence of low-priced subject imports.

Acadian argues that subject imports were pulled into the U.S. market because the domestic industry was unable to meet increasing U.S. demand, consistent with the domestic supply constraints reported by responding purchasers.[232] According to Acadian, customers purchased subject imports even after domestic producers' pandemic-related labor and

[225] CR/PR at Tables VI-5 and C-1.

[226] CR/PR at Tables VI-7 and C-1.

[227] CR/PR at Tables IV-2 and IV-10.

[228] CR/PR at Tables III-3 and III-5; Conference Tr. at 17 (Novak), 36 (Epstein), 44-45 (Epstein), 44 (Novak), 45 (Biggins), 46 (Holt).

[229] We note, however, that *** reported *** and that *** imports in interim 2023 were *** million paper plates greater than its imports in interim 2022, while in comparison, subject imports as a whole were *** in interim 2023 than in interim 2022. Calculated from CR/PR at Tables III-5, III-11, and C-1.

[230] CR/PR at Tables VI-12 and VI-13.

[231] CR/PR at Tables VI-12 and VI-13.

[232] Acadian Postconference Br. at 21-24. Purchasers also pointed to the domestic industry's supply constraints between 2020 and 2022 as reasons for purchasing subject paper plates. ***. Similarly, ***. In addition, ***. CR/PR at V-27-28.

paperboard shortages ended for non-price reasons including ***.[233] The APPC maintains that the "bottlenecks caused by labor and raw material shortages ended" in 2022 and that the domestic industry had sufficient capacity to supply the entirety of apparent U.S. consumption, but that it lost sales and market share to subject imports on the basis of price, not lack of availability or quality issues.[234] As previously discussed, the record shows that the domestic industry had substantial excess practical production capacity and increasing end-of-period inventories over the POI with which it could have supplied more product to the U.S. market.[235] In any final phase of these investigations, we intend to further investigate the extent to which subject imports increased due to the domestic industry's supply constraints rather than price.[236] [237]

We have also considered whether there were other factors, including demand conditions and nonsubject imports, that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject merchandise. Apparent U.S. consumption increased by 1.3 percent over the full years of the POI, as the domestic industry added production capacity and increased production but lost market share to cumulated subject imports. Although it was 3.8 percent lower in interim 2023 than in interim 2022, the domestic industry's greater 4.4 percent decline in U.S. shipments was driven by the industry's loss of market share to increasing cumulated subject imports.[238]

Nonsubject imports were the smallest source of supply to the U.S. market throughout the period of investigation, accounting for *** percent of apparent U.S. consumption throughout the POI. Accordingly, nonsubject imports cannot explain the domestic industry's loss of market share and other adverse trends during the POI.[239]

In sum, based on the record of the preliminary phase of the investigations, we conclude that cumulated subject imports had a significant impact on the domestic industry.

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[233] Acadian Postconference Br. at 24.

[234] APPC Postconference Br. at 23; Conference Tr. at 6-7 (Bay).

[235] CR/PR at Tables III-4 and III-9.

[236] We note that in 2022, when most of the increase in subject import market share occurred, subject imports undersold domestic products in zero of six quarterly comparisons, while *** percent of the subject imports reported in the purchase cost data had lower purchase costs than the price of the domestic like product. Calculated from CR/PR Tables V-5 to V-9.

[237] Acadian also points to the APPC members' intra-industry competition with Georgia Pacific, the *** producer in the U.S. market, as a potential cause of the APPC members' loss of sales and injury. Acadian Postconference Br. at 19. As an initial matter, the Commission is required to conduct its injury analysis with respect to the domestic industry as a whole, which includes Georgia Pacific. 19 U.S.C. § 1677(4)(A). Intra-industry competition, in any event, would not explain the domestic industry's loss of market share to cumulated subject imports.

[238] CR/PR at Table C-1.

[239] CR/PR at Tables IV-10 and C-1.

VIII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of paper plates from China, Thailand, and Vietnam that are allegedly sold in the United States at less than fair value and imports of paper plates from China and Vietnam that are allegedly subsidized by the governments of China and Vietnam.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by the American Paper Plate Coalition ("APPC"), which is comprised of AJM Packaging Corporation ("AJM Packaging"), Bloomfield Hills, Michigan; Aspen Products, Inc., Kansas City, Missouri; Dart Container Corporation, Mason, Michigan; Hoffmaster Group, Inc., Oshkosh, Wisconsin; Huhtamaki Americas, Inc., De Soto, Kansas; and Unique Industries, Inc., Philadelphia, Pennsylvania on January 25, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of paper plates[1] from China and Vietnam and less-than-fair-value ("LTFV") imports of paper plates from China, Thailand, and Vietnam. Table I-1 presents information relating to the background of these investigations.[2] [3]

Table I-1
Paper plates: Information relating to the background and schedule of this proceeding

Effective date	Action
January 25, 2024	Petitions filed with Commerce and the Commission; institution of the Commission investigations (89 FR 6130, January 31, 2024)
February 15, 2024	Commission's conference
February 14, 2024	Commerce's notice of initiation for CVD investigations (89 FR 13043, February 21, 2024)
February 14, 2024	Commerce's notice of initiation for AD investigations (89 FR 14046, February 26, 2024
March 8, 2024	Commission's vote
March 11, 2024	Commission's determinations
March 18, 2024	Commission's views

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

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

[3] A list of witnesses appearing at the conference is presented in appendix B of this report.

Statutory criteria

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

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

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

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

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

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

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

Organization of report

Part I of this report presents information on the subject merchandise, alleged subsidy and dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

Paper plates are generally used as tableware for casual dinners, picnics, large formal gatherings, or any event where the plate is to be discarded after eating, including certain foodservice establishments and takeout meals. The leading U.S. producers of paper plates are ***, while leading producers of paper plates outside the United States include *** of Thailand and *** of Vietnam.[6] The leading U.S. importer of paper plates from China is ***, while the leading importer of paper plates from Thailand is ***, and the leading importer of paper plates from Vietnam is ***. Leading importers of product from nonsubject countries (primarily Mexico, India, and Poland) include ***. U.S. purchasers of paper plates are firms that purchase paper plates from U.S. producers and U.S. importers of product; leading purchasers include ***.

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

Apparent U.S. consumption of paper plates totaled approximately 53.3 billion paper plates ($2.8 billion) in 2022. Currently, seven firms are known to produce paper plates in the United States. U.S. producers' U.S. shipments of paper plates totaled 50.7 billion paper plates ($2.7 billion) in 2022, and accounted for 95.1 percent of apparent U.S. consumption by quantity and 95.6 percent by value. U.S. importers' U.S. shipments of imports from subject sources totaled *** paper plates ($***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** paper plates ($***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of seven firms that accounted for the vast majority of U.S. production of paper plates during 2022. U.S. imports are based on the questionnaire responses of 14 U.S. importers of paper plates.[7]

Previous and related investigations

Paper plates has not been the subject of any prior countervailing and/or antidumping duty investigations in the United States.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On February 21, 2024, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigation on paper plates from China and Vietnam.[8]

Alleged sales at LTFV

On February 26, 2024, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on paper plates from China, Thailand, and

[7] Data for imports of paper plates from all import sources are compiled from data submitted in response to Commission questionnaires.

[8] For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 89 FR 13043, February 21, 2024.

Vietnam.[9] Commerce has initiated antidumping duty investigations based on estimated dumping margins of 154.57 to 178.80 percent for paper plates from China, 61.03 to 73.17 percent for paper plates from Thailand, and 153.09 to 165.27 percent for paper plates from Vietnam. [10]

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[11]

> *The merchandise subject to these investigations is certain paper plates. Paper plates subject to these investigations may be cut from rolls, sheets, or other pieces of paper and/or paper board. Paper plates subject to these investigations have a depth up to and including two (2.0) inches, as measured vertically from the base to the top of the lip, or the edge if the plate has no lip. Paper plates subject to these investigations may be uncolored, white, colored, or printed. Printed paper plates subject to these investigations may have any type of surface finish, and may be printed by any means with images, text and/or colors on one or both surfaces. Colored paper plates subject to this investigation may be colored by any method, including but not limited to printing, beater-dyeing, and dip-dyeing. Paper plates subject to these investigations may be produced from paper of any type (including, but not limited to, bamboo, straws, bagasse, hemp, kenaf, jute, sisal, abaca, cotton inters and reeds, or from non-plant sources, such as synthetic resin (petroleum)-based resins), may have any caliper or basis weight, may have any shape or size, may have one or more than one section, may be embossed, may have foil or other substances adhered to their surface, and/or may be uncoated or coated with any type of coating.*
>
> *The paper plates subject to these investigations remain covered by the scope of these investigations whether imported alone, or in any combination of subject and non-subject merchandise. When paper plates subject to these investigations are imported in combination with non-subject merchandise, only the paper plates subject to these investigations are subject merchandise.*

[9] 89 FR 14046, February 26, 2024.
[10] 89 FR 14050, February 26, 2024.
[11] 89 FR 13043, February 21, 2024.

The paper plates subject to these investigations include paper plates matching the above description that have been finished, packaged, or otherwise processed in a third country by performing finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the paper plates. Examples of finishing, packaging, or other processing in a third country that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the paper plates include, but are not limited to, printing, application of other surface treatments such as coatings, repackaging, embossing, and application of foil surface treatments.

Excluded from the scope of these investigations are paper plates molded or pressed directly from paper pulp (including but not limited to unfelted pulp), which are currently classifiable under subheading 4823.70.0020 of the Harmonized Tariff Schedule of the United States (HTSUS).

Also excluded from the scope of these investigations are articles that otherwise would be covered but which exhibit the following two physical characteristics: (a) depth (measured vertically from the base to the top of the lip, or edge if no lip) equal to or greater than 1.25 inches but less than two (2.0) inches, and (b) a base not exceeding five (5.0) inches in diameter if round, or not exceeding 20 square inches in area if any other shape.

Also excluded from the scope of these investigations are paper bowls, paper buckets, and paper food containers with closeable lids.

Paper plates subject to these investigations are currently classifiable under HTSUS subheading 4823.69.0040. Paper plates subject to these investigations also may be classified under HTSUS subheading 4823.61.0040. If packaged with other articles, the paper plates subject to these investigations also may be classified under HTSUS subheadings 9505.90.4000 and 9505.90.6000. While the HTSUS subheading(s) are provided for convenience and customs purposes, the written description of the subject merchandise is dispositive.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations are imported under statistical reporting number 4823.69.0040 of the Harmonized Tariff Schedule of the United States ("HTS"). This tariff classification contains other products outside the scope of these investigations. The 2023 general rate of duty is "free." Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection. Effective May 10, 2019, products covered by statistical reporting number 4823.69.0040 originating in China are subject to an additional 25 percent ad valorem duty under Section 301 of the Trade Act of 1974.[12]

The product[13]

Description and applications

Paper plates are used as tableware for casual dinners, picnics, large formal gatherings, or any event where the plate is to be discarded after eating, including certain foodservice establishments and takeout meals.

Paper plates may be white (Figure I-1), colored (Figure I-2), and/or printed, and if printed, may be printed and/or laminated with images (Figure I-3), text and/or colors on one or both surfaces. Colored paper plates may be colored by, including but not limited to, printing, beater-dyeing, and dip-dyeing. Paper plates may be produced from paper or paperboard of any type, have any caliper or basis weight, have any size or shape, have one or more sections, be fluted or unfluted, and be uncoated or have any surface finish, including but not limited to coating, laminating, cold-stamping, hot-stamping, die-cutting, and/or embossing.

[12] The U.S. Trade Representative imposed the tariffs under Section 301 of the Trade Act of 1974 after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S. commerce. 82 FR 40213, August 24, 2017 and 83 FR 14906, April 6, 2018. The products included in the third enumeration ("Tranche 3") of goods produced in China are subject to additional Section 301 duties. Tranche 3 tariffs with a duty rate of 10 percent were put in place September 24, 2018 (83 FR 47974, September 21, 2018). On May 10, 2019, tranche 3 tariffs were increased to 25 percent ad valorem (84 FR 20459, May 9, 2019). If a Tranche 3 good was exported from China to the United States prior to May 10, 2019, and entered the United States prior to June 1, 2019, it was not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019). See HTS heading 9903.88.03 and U.S. notes 20 (e) and (f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2023) Rev. 9, Pub. 5445, June 2023, pp. 99-III-27, 99-III-28, 99-III-41.

[13] Unless otherwise noted, the information in this section is based on the Petition, Vol. I, pp. 5-6, 7. The universe of paper plates is extensive, and the discussion provided is not exhaustive.

Figure I-1
White paper plate

Source: Hoffmaster, https://www.hoffmaster.com/tableware/view-all-tablewares/plates-bowls.html, retrieved February 20, 2024.

Figure I-2
Black paper plate

Source: Hoffmaster, https://www.hoffmaster.com/solid-color-round-paper-platepl7096.html, retrieved February 26, 2024.

Figure I-3
Colored paper plates with images

Source: Shutterstock.com, https://www.shutterstock.com/image-photo/set-colorful-polka-dots-paper-plates-619768586, retrieved February 26, 2024.

Paper plates are sold by shape, grade, size, coating, quantity, pattern, and colors. Grades of paper plates range from uncoated "economy" or "value" plates to heavy duty paper plates, which often are colored or are decorated with a pattern. Packages of paper plates are typically sold containing only one size, pattern, color, shape, and grade. Paper plates can also be marketed by use, which can refer to a subset of paper plates within a certain size tolerance, such as round "dinner" plates measuring between 8.5 inches and 10 inches in diameter.

Manufacturing processes[14]

The overall process of manufacturing paper plates involves feeding paperboard from master rolls into a printing press for designs and/or coatings, if necessary, then onto a forming press where plate are dye-cut and pressed into final size, shape, and form.

The paperboard used in the production of paper plates is made from mechanical pulp, chemical pulp, and/or recycled paper pulp, as well as additional fillers and additives. Most of the paperboard used for producing paper plates is from virgin paper not recycled paper.[15] Pulping is the process of breaking down wood or existing paper into its individual fiber strands.

[14] Unless otherwise noted, the information in this section is based on the Petition, Vol. I, pp. 6-7, conference transcript, and the submission from importer Acardium.

[15] Conference transcript, p. 40 (Biggins).

Mechanical pulping breaks the solid wood apart into wood fibers. Typically, the thermomechanical process is used, where logs are processed into small, uniformly sized chips in a woodchipper. These wood chips are then placed into refiners that use two rotating disks to apply heat and pressure to break apart the chips into fibers.

Chemical pulping breaks the wood apart into fibers using chemicals. Specifically, wood logs are chipped, then those chips are placed in a pressurized digester cooking vessel with water and chemicals to separate out cellulose fibers.

Recycled pulp takes used paper products and breaks them down into cellulose fiber strands using water, chemicals, and heat. The resulting fibers from these processes are then washed and bleached before being used to make paperboard.

The two main types of virgin paperboard used to produce paper plates are folding box board ("FBB") and sulphate bleached stock ("SBS"). FBB is typically made from layers of mechanical pulp sandwiched between layers of bleached chemical pulp. The top layer is pigment coated. SBB is made from bleached pulp, usually has a pigment coated top surface, and can also be pigment coated on the back.[16] SBS is denser than FBB. SBS and FBB process differently in paper plate machines; SBS runs faster, is less dusty, and the machine blades do not have to be sharpened as frequently. Thus, SBS is preferred to FBB in producing paper plates.[17]

Once created, the pulp is then sprayed onto a moving mesh screen where water is removed though suction and squeegees. After nearly all the water is removed, the resulting sheet of paper is hot-rolled, pressed and squeezed into layers of paper, which are then combined and given a clay coating to provide strength, resulting in paperboard. The paperboard is then placed on rolls and cut to a specific width. The paperboard caliper (thickness) is based on customer preferences for their paper plates.[18]

The paperboard rolls[19] are then delivered to paper plate plants. The paperboard rolls are converted directly into paper plates or, as an interim and optional step, printed on a large multi-deck printing press to add designs and printing. The interim step also adds coatings for

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[16] Iggesund Paperboard, "Product Category: General Technical Information," 2009, accessed February 27, 2024, https://web.archive.org/web/20110713004736/http://www.iggesund.com/Main.aspx?ID=d3f6ae98-6286-435d-bf6d-99a7ca881cab

[17] Conference transcript, pp. 31-32 (McDonough).

[18] Conference transcript, p. 12 (Biggins).

[19] The master paper rolls can weigh around 3,000 pounds each. Conference transcript, p. 12 (Biggins).

strength and liquid resistance. Moreover, when printed, plates must be coated for direct contact with food.[20]

The paperboard roll is then fed into a paper plate making machine production line for conversion into paper plates. The paperboard is cut into the desired plate shape and size, and then "scored" (indentions added) for structural stability. Depending on how deep a plate is, the paperboard may be micro-scored around the edges before dye-cutting to aid in forming the plate.[21] The cut and scored flat paper disc is then molded into the finished paper plate product. According to the petitioners, their scrap paper does not reach a waste stream and is recycled as a pulp substitute in paper mills to make more paper.[22]

Upon completion, the finished paper plates are collated, bagged, packaged, and shipped (Figure I-4 is an example of a package of paper plates for retail sale).

Figure I-4
Packaged paper plates

Source: Petition, Vol. I, p. 17.

[20] Conference transcript, p. 34 (McDonough).

[21] Conference transcript, p. 12 (Biggins).

[22] Conference transcript, p. 12 (Biggins), p. 41 (Biggins), and p. 67 (Holt, McDonough, Epstein, and Daniel).

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposes a single domestic like product that should be defined to be coextensive with the scope definition of the subject merchandise, consisting of all forms and sizes of paper plates.[23] No respondent interested party contested the petitioners proposed single like product definition. U.S. producers and U.S. importers were asked to assess the degree of comparability of in-scope paper plates with out-of-scope liquid fiber paper plates based on six factors. Table I-2 presents the count of firms' comparisons.[24]

Table I-2
Paper plates: Count of firms' responses regarding the domestic like factors comparing out-of-scope liquid fiber paper plates to in-scope paper plates

Count in number of firms reporting

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

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

[23] Petitioners' postconference brief, p. 6.

[24] Firms' narrative comparisons of in-scope paper plates to out-of-scope liquid fiber paper plates are presented in Appendix D.

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

U.S. market characteristics

Multiple U.S. producers produce and sell paper plates, mostly to retailers. Paper plates can be sold under a producers' brand or under a purchaser's private label brand.[1] U.S. producer Hoffmaster indicated that large retailer purchasers work with both domestic producers and foreign suppliers to ensure that private label designs can be quickly implemented.[2] The dominant U.S. producer brand is Dixie, owned by U.S. producer Georgia-Pacific, a vertically integrated producer (i.e., producing both the raw material paperboard and paper plates).[3]

Petitioners described paper plate demand as having increased steadily before 2020 and then increasing sharply in 2020 due to the COVID-19 pandemic, which caused many consumers to eat more meals at home. Petitioners also indicated that during the COVID-19 pandemic, health concerns and government actions caused labor constraints and supply chain disruptions, which in turn led to some raw material (paperboard) suppliers putting paper plates producers on allocation, especially in 2021. During this period, some purchasers turned to Asian paper plate suppliers. (U.S. producer Aspen Products described the U.S. paper plates market as historically not served by Asian suppliers because paperboard (the primary raw material used in paper plate production) is historically priced similarly or more expensively in Asia.)[4] Petitioners described U.S. paper plate demand as now having normalized at levels higher than prior to 2020 while paperboard supply has become plentiful, albeit at higher prices.[5] However, purchasers continue to purchase subject imports.

Apparent U.S. consumption of paper plates increased by 1.3 percent from 2020 to 2022. It was 3.8 percent lower in interim 2023 than in interim 2022.

Most U.S. producers (5 of 7) and importers (9 of 14) indicated that the paper plates market was not subject to distinctive conditions of competition. Among the two U.S. producers reporting that there were distinct conditions, *** reported that price was the most important factor, followed by service and quality, and ***[6] reported that low-priced imports from subject countries has "generated aggressive competition." The five

[1] Conference transcript, pp. 46-48 (Epstein and Novak). Retailers' private labels may be supplied by multiple suppliers. Conference transcript, p. 48 (Gordon).

[2] Conference transcript, p. 54 (White).

[3] Conference transcript, pp. 64-64 (Epstein and Biggins).

[4] Conference transcript, pp. 55 (Biggins). See also postconference brief of Retail Industry Leaders Association, pp. 1-2.

[5] Conference transcript, pp. 7-8 (Bay), 13-15 (Biggins), and 74 (Hoffmaster).

[6] ***.

importers reporting distinct conditions mentioned the following: more factories, price changes with wood pulp prices, and plate design and themes. In addition, importer *** stated that recycling claims, breadth of supplier portfolio, printing flexibility, ability to bundle with other products, custom package sizes, inventories to support demand surges, and retailer promotions are distinctive conditions of competition.

U.S. producers and importers were asked if there had been any changes to the product mix, range, or marketing of paper plates since January 1, 2020. Five U.S. producers and 11 importers indicated that there had been no change. Two U.S. producers and two importers indicated that there had been. U.S. producer *** indicated that there has been a demand shift away from 8.5-inch coated plates to 10-inch coated plates, as well as a demand shift away from 9-inch fluted plates. U.S. producer *** stated that there had been increased product offerings and marketing tactics. Importer *** stated that 60-100 new Chinese suppliers ***. Importer *** described changes including new certified compostable plates, increased club store demand for larger club-pack sizes, and supply constraints causing an end to retailer consumer price promotions.

Impact of section 301 tariffs

Most U.S. producers (4 of 7) reported that section 301 tariffs did not impact the U.S. paper plates market, while most importers reported that the tariffs did impact the market.[7] The sole U.S. producer (***) that reported an impact stated that import prices initially increased but then fell below the U.S. cost of production, due to Chinese "government subsidies." It continued that the tariffs now have no impact on Chinese pricing.

Eight of 14 importers indicated that the section 301 tariffs did have an impact on the U.S. paper plate market.[8] Most of these importers reported that the effect was increased costs for paper plates. Some importers also reported increased sales prices, while one importer (***) reported that although its costs of acquiring paper plates have increased, its sales prices to consumers have decreased because of increased competition from Chinese manufacturers. Importer *** stated that the section 301 tariffs increased demand for domestic paper plates, but that the U.S. industry did not have enough capacity to meet the increased demand, and that domestic suppliers raised prices and did not supply all

[7] One U.S. producer (***) reported that there was an impact, four reported there was not an impact, and two did not know.

[8] Two importers reported there was not an impact, and four did not know.

purchasers. Importer *** reported that U.S. producers became as competitive as Chinese suppliers. Importer *** stated that although the tariffs increased its costs, it continued to import from China because of better quality and designs. Importer ***.

Channels of distribution

U.S. producers and importers sold paper plates mainly to retailers (table II-1).

Table II-1
Paper plates: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
United States	Distributors	***	***	***	***	***
United States	Retailers	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Retailers	***	***	***	***	***
Thailand	Distributors	***	***	***	***	***
Thailand	Retailers	***	***	***	***	***
Vietnam	Distributors	***	***	***	***	***
Vietnam	Retailers	***	***	***	***	***
Subject	Distributors	***	***	***	***	***
Subject	Retailers	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Retailers	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Retailers	***	***	***	***	***

Note: Distributors includes food service companies. Retailers includes end users (such as restaurants).

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

Geographic distribution

U.S. producers and subject importers reported selling paper plates to all U.S. regions (table II-2). For U.S. producers, 5.3 percent of sales were within 100 miles of their production facility, 53.3 percent were between 101 and 1,000 miles, and 41.4 percent were over 1,000

miles. Importers sold 20.0 percent within 100 miles of their U.S. point of shipment, 66.4 percent between 101 and 1,000 miles, and 13.6 percent over 1,000 miles.

Table II-2
Paper plates: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	China	Thailand	Vietnam	Subject sources
Northeast	7	11	2	5	12
Midwest	7	11	2	4	12
Southeast	7	11	2	5	12
Central Southwest	7	12	2	5	13
Mountain	7	10	1	5	11
Pacific Coast	7	11	2	5	12
Other	6	7	0	3	8
All regions (except Other)	7	10	1	4	11
Reporting firms	7	12	2	5	13

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

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

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding paper plates from U.S. producers and from subject countries (when available).

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

Quantity in 1,000 paper plates; ratio and share in percent

Factor	Measure	United States	China	Thailand	Vietnam	All subject
Capacity 2020	Quantity	***	***	***	***	***
Capacity 2022	Quantity	***	***	***	***	***
Capacity utilization 2020	Ratio	***	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***	***
Inventories to total shipments 2020	Ratio	***	***	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***	***	***
Home market shipments 2022	Share	***	***	***	***	***
Non-US export market shipments 2022	Share	***	***	***	***	***
Ability to shift production (firms reporting “yes”)	Count	***	***	***	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of paper plates in 2022. Responding foreign producer/exporter firms accounted for a very small share of Thai production of paper plates and most Vietnamese production of paper plates during 2022. No Chinese producers provided foreign producer questionnaires. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data and Data Sources.”

Domestic production

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

Subject imports from China

Limited information is available on the paper plates industry in China (see Part VII). No Chinese producers provided a response to the Commission’s questionnaire. As shown in Part VII, China is a massive exporter to markets other than the United States of the broader 6-digit HS category covering paper plates (4823.69), suggesting Chinese producers may have a large ability to increase shipments of paper plates to the U.S. market. At the conference, petitioners

indicated that Chinese producers may also be opening affiliate production in Thailand and Vietnam.[9]

Subject imports from Thailand

Based on available information, producers of paper plates from Thailand have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of paper plates to the U.S. market. The main contributing factors to this degree of responsiveness of supply are ***, suggesting some ability to increase shipments to the U.S. market.

Subject imports from Vietnam

Based on available information, producers of paper plates from Vietnam have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of paper plates to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the large change in Vietnamese capacity over 2020 to 2022. Vietnamese producers have limited inventories, limited alternative export markets, and high capacity utilization. Nonetheless, Vietnamese capacity increased by over 80 percent over 2020 to 2022 and Vietnamese shipments to the U.S. market increased by over ten times in the same period, suggesting that Vietnamese producers have the ability to add capacity and increase shipments to the U.S. market.

Imports from nonsubject sources

Nonsubject imports accounted for a very small share (***) of total reported imports during the period. (See Part IV).

Supply constraints

At the conference, petitioners described the COVID-19 pandemic as causing disruptions to their production because of labor constraints, health concerns, government restrictions on their production, and the inability of their raw material (paperboard) suppliers to supply

[9] Conference transcript pp. 58-59 (Novak, Gordon).

sufficient paperboard.[10] U.S. producer Aspen Products indicated that during the COVID-19 pandemic, it tried to acquire paperboard from Asia, but learned that Asian paperboard suppliers were experiencing the same production difficulties as U.S. paperboard suppliers.[11]

In their questionnaires, all seven U.S. producers reported that they had experienced supply constraints since January 1, 2020. U.S. producers reported constraints because of labor and supply chain issues related to the COVID pandemic and because of paperboard shortages. Most U.S. producers reported putting customers on allocation at times during 2020 to 2023. Specifically, customer allocations, reduced supply, and/or declining to accept new customers were reported by ***. *** did not specifically report allocations but stated that demand for paper plates exceeded supply during a 2.5-year period during the pandemic. *** reported that there are no longer paperboard shortages and that there are capacity increases planned in 2025 in the paperboard industry.

While eight importers reported no supply constraints, six importers reported that they had experienced supply constraints since January 1, 2020. Most of the importers reporting supply constraints were retailers (***) and they generally referred to supply issues from domestic manufacturers. However, importer *** reported supply chain disruptions during the pandemic including ocean transport constraints as well as input factory closures and disruptions. It added that these issues occurred during late-2020 to mid-2021 and between mid-2022 and mid-2023, followed by a surge of imports from subject countries. Among the importers reporting issues with domestic suppliers, *** stated that that its orders were completed up to six months late and that its paper plate supply in 2022 was severely depleted due to “domestic supplier issues;” *** reported being unable to fill supply gaps in 2021 to 2022 when U.S. producers were out of stock because of increased demand related to the COVID-19 pandemic; *** reported having to import paper plates because it was unable to obtain them from U.S. producers or importers; and *** stated

[10] Conference transcript, pp. 14-17 (Biggins) and 75 (Epstein and Novak).

[11] Conference transcript, pp. 13-14 (Biggins), 16-17 (Novak), 55-56 (Biggins), 75 (Epstein), and 75-76 (Novak).

that domestic producers had not been able to supply at a steady rate since the pandemic, leaving it without supply and unable to have the product for its customers.

U.S. demand

Based on available information, the overall demand for paper plates is likely to experience moderate-to-large changes in response to changes in price. The main contributing factors are the availability of substitute products and the nature of paper plates as not a necessity for consumers.

Business cycles

Most U.S. producers (six) and importers (nine) indicated that the U.S. paper plate market was subject to business cycles. These six U.S. producers and nine importers described these cycles as based on seasonality in paper plate demand. They generally reported that demand is higher in the late spring and summer and/or during the November and December holiday seasons. Two U.S. producers reported that the COVID-19 pandemic had an impact on business cycles, with one firm stating that the market did not have the normal seasonal increase during the pandemic, and another firm stating that retailers made fewer changes to product assortment during the pandemic. One U.S. producer and five importers indicated that the U.S. paper plate market was not subject to any business cycles.

Demand trends

Most firms reported an increase in U.S. demand for paper plates since January 1, 2020 (table II-4).

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

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
Domestic demand	U.S. producers	4	3	0	2	0
Domestic demand	Importers	5	4	4	1	1
Foreign demand	U.S. producers	4	0	0	0	0
Foreign demand	Importers	2	0	3	0	0

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

In additional comments, *** described paper plate demand as driven by convenience and affordability. *** described paper plate consumption trends as increasing *** percent from 2019

to 2020, increasing *** percent from 2020 to 2021, decreasing *** percent from 2021 to 2022, and decreasing *** percent from 2022 to 2023. *** stated that the "massive" increase in sellers of Chinese paper plates on Amazon had decreased demand for its products with paper plates about 50 percent. *** stated that consumers have moved to paper plates from disposable plates made of other materials due to foam bans and environmental concerns. It added that on the negative side, consumers may have less discretionary income in 2023 and 2024. *** also noted that environmental concerns and foam bans in other countries have led to both domestic and international substitution toward paper plates. *** described demand increasing steadily with consumer disposable income. Other U.S. producers and importers cited the COVID-19 pandemic as increasing demand. For example, *** stated that the COVID-19 pandemic led to more consumers eating at home, while the end of the pandemic has reversed that trend.

Substitute products

All seven U.S. producers and 7 of 14 importers reported that there were substitutes for paper plates. Substitutes for paper plates listed by firms included disposable plates made of plastic, foam, or fiber, and, for one firm, permanent plates. Multiple firms described consumers moving away from foam plates due to environmental concerns, as foam plates are made from petroleum products. Additionally, *** indicated that while foam plates are less expensive than paper plates, they do not have the same functionality (e.g., they are not always microwave safe). Some firms describing plastic and/or molded fiber plates as substitutes for paper plates indicated that these plates are not price competitive with paper plates. Seven importers indicated that there were no substitutes for paper plates.

Seven U.S. producers and six importers firm reported that changes in the prices of substitutes had not affected the prices of paper plates.[12]

Substitutability issues

This section assesses the degree to which U.S.-produced paper plates and imports of paper plates from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of paper plates from domestic and imported sources based on those factors. Based on available data, staff believes that there

[12] One importer reported that changes in the prices of paper bowls affect prices for paper plates.

is a moderate-to-high degree of substitutability between domestically produced paper plates and paper plates imported from subject sources.[13] A majority of U.S. producers and importers described paper plates from different sources as always interchangeable. Nonetheless, some importers and purchasers described some factors other than price, especially availability, as important and at least sometimes a reason why they imported or purchased subject paper plates rather than purchase U.S. paper plates.

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations[14] were asked to identify the main purchasing factors their firm considered in their purchasing decisions for paper plates.

The most often cited top three factors firms consider in their purchasing decisions for paper plates were availability/supply and price/cost (8 firms each) and quality/selection (7 firms), as shown in table II-5. Availability/supply and quality/selection was the most frequently cited first-most important factors (cited by 4 firms each). Availability/supply was the most frequently reported second-most important factor (3 firms); and price/cost was the most frequently reported third-most important factor (6 firms).

Table II-5
Paper plates: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Availability / Supply	4	3	1	8
Price / Cost	0	2	6	8
Quality / Selection	4	2	1	7
All other factors	0	1	0	1

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

Note: Availability/supply includes production capacity and supply chain infrastructure and reliability. Other factors include strategic partnerships and willingness and capabilities related to custom private label products. ***.

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

[14] This information is compiled from responses by purchasers identified by Petitioners to the lost sales and lost revenue allegations. See Part V for additional information.

Lead times

Paper plates are primarily sold from inventory. U.S. producers/importers reported that 65.8 percent of their commercial shipments were from inventories, with lead times averaging about 9 days. The remaining 34.2 percent of their commercial shipments were produced-to-order, with lead times averaging about 19 days. Importers reported that 93.9 percent of their commercial shipments were from U.S. inventories, with lead times averaging about 7 days. Another 6.1 percent of their commercial shipments were produced-to-order, with lead times averaging about 116 days.

Comparison of U.S.-produced and imported paper plates

In order to determine whether U.S.-produced paper plates can generally be used in the same applications as imports from China and Thailand, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-6 to II-7, almost all U.S. producers and most importers reported that the U.S. product is always interchangeable with imports from each subject country and with imports from nonsubject sources.

Table II-6
Paper plates: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	5	1	0	0
United States vs. Thailand	5	1	0	0
United States vs. Vietnam	5	1	1	0
China vs. Thailand	5	1	0	0
China vs. Vietnam	5	1	0	0
Thailand vs. Vietnam	5	1	0	0
United States vs. Other	4	0	1	0
China vs. Other	4	0	1	0
Thailand vs. Other	4	0	1	0
Vietnam vs. Other	4	0	1	0

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

Table II-7
Paper plates: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	7	3	1	2
United States vs. Thailand	4	0	0	2
United States vs. Vietnam	5	0	2	2
China vs. Thailand	3	0	1	1
China vs. Vietnam	5	0	2	1
Thailand vs. Vietnam	3	0	0	1
United States vs. Other	4	0	0	1
China vs. Other	3	0	1	0
Thailand vs. Other	2	0	0	1
Vietnam vs. Other	3	0	0	1

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

One U.S. producer and three importers provided additional comments on interchangeability. U.S. producer *** reported that the quality of paper plates imported from the three subject countries tends to be lower than domestic paper plates, ***. Importer *** reported that design capabilities are "sometimes similar" in comparing paper plates produced in the United States, China, and Vietnam. Importer *** reported that lack of supply routes limits its ability to interchange products from the United States, Thailand or Vietnam, and that eco-packaging requirements in nonsubject countries *** could limit a move to production from China to those countries. Importer *** reported that high U.S. labor costs are the reason why it believes U.S. product is never interchangeable with imported product.

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of paper plates from the United States, subject, or nonsubject countries. As seen in tables II-8 to II-9, most U.S. producers reported that such differences were never significant factors. Importer responses were more varied, with a majority of firms reporting that differences between domestic product and subject imports were at least sometimes significant factors in their sales.

Table II-8
Paper plates: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	0	1	5
United States vs. Thailand	0	0	1	5
United States vs. Vietnam	0	0	2	5
China vs. Thailand	0	0	1	5
China vs. Vietnam	0	0	1	5
Thailand vs. Vietnam	0	0	1	5
United States vs. Other	0	0	2	3
China vs. Other	0	0	1	3
Thailand vs. Other	0	0	1	3
Vietnam vs. Other	0	0	1	3

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

Table II-9
Paper plates: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	3	3	4	3
United States vs. Thailand	1	1	2	1
United States vs. Vietnam	1	2	3	2
China vs. Thailand	0	1	2	1
China vs. Vietnam	0	2	3	2
Thailand vs. Vietnam	0	0	1	2
United States vs. Other	0	0	3	2
China vs. Other	0	0	3	2
Thailand vs. Other	0	0	1	1
Vietnam vs. Other	0	0	1	2

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

One U.S. producer and six importers provided additional comments on factors other than price, including some comments that were the same as those reported in the interchangeability question.[15] Several importers reported that availability and quality were differences other than price that were significant factors in their sales or purchases from different sources. *** reported that domestic producers have much less product availability than subject imports. *** reported that it can often import paper plates from the three subject countries at a lower price, from manufacturers that produce good quality products and have enough production capacity. ***

[15] Comments by U.S. producer *** and importer *** were the same as reported in interchangeability and are not repeated in this section.

***. *** reported that factors that are sometimes significant include brand, quality, transportation network, and technical support. *** reported that differences other than price between U.S. product and imports from Thailand and Vietnam included product availability, customer service, technical support, responsiveness, presence in adjacent categories, pre-existing supply relationships, and dedicated warehousing infrastructure.

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of seven firms that accounted for the vast majority of U.S. production of paper plates during 2022.

U.S. producers

The Commission issued a U.S. producer questionnaire to eleven firms based on information contained in the petition, and through staff research. Seven firms provided usable data on their operations.[1] Staff believes that these responses represent (the vast majority) of U.S. production of paper plates.

Table III-1 lists U.S. producers of paper plates, their production locations, positions on the petition, and shares of total production.

[1] *** indicated that it is not a U.S. producer of paper plates. ***. Email from ***, January 30, 2024.

Table III-1
Paper plates: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2022

Firm	Position on petition	Production location(s)	Share of production
AJM Packaging	Petitioner	Detroit, MI Folkston, GA Vineland, NJ Joplin, MO Southgate, MI El Cajon, CA	***
Aspen Products	Petitioner	Kansas City, MO Richmond, VA Macon, GA	***
Dart Container	Petitioner	Federalsburg, MD Chicago, IL	***
Georgia-Pacific	***	Darlington, SC Fort Smith, AR Bowling Green, KY	***
Hoffmaster	Petitioner	Clintonville, WI Appleton, WI Neenah, WI Green Bay Joliet, IL Oshkosh, WI	***
Huhtamaki Americas	Petitioner	Marion, IN Batavia, OH Goodyear, AZ Albertville, AL	***
Unique Industries	Petitioner	Montoursville, PA	***
All firms	Various	Various	***

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

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

Table III-2
Paper plates: U.S. producers' ownership, related and/or affiliated firms

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

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

As indicated in table III-2, *** U.S. producer *** is related to a foreign producer/exporter of the subject merchandise. In addition, as discussed in greater detail below, *** U.S. producers *** directly imported the subject merchandise during the period of investigation, while *** purchased the subject merchandise from U.S. importers.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of paper plates since 2020. *** U.S. producers indicated in their questionnaires that they had experienced such changes. Table III-3 presents the changes identified by these producers.

In November 2020, Georgia-Pacific announced the completion of a $100 million expansion at it's Bowling Green Dixie (plate and bowl) facility, which included an 80,000 square foot building and a new printer and presses.[2] In October 2023, Georgia-Pacific announced the completion of the plate and bowl production expansion of its Darlington, South Carolina facility that began in March 2020.[3] Georgia Pacific announced its Jackson, Tennessee production facility's construction will be completed by the summer of 2024. Georgia-Pacific's 900k sq. feet facility will be dedicated to production of paper plates and bowls.[4]

[2] https://news.gp.com/2020/11/georgia-pacific-completes-100-million-expansion-of-bowling-green-dixie-facility. Georgia-Pacific Completes $100 Million Expansion of Bowling Green Dixie Facility. Accessed March 1, 2024.

[3] https://news.gp.com/2023/10/georgia-pacific-completes-175-million-investment-at-darlington-south-carolina-dixie-facility. Georgia-Pacific Completes $175 Million Investment at Darlington, South Carolina, Dixie Facility. Accessed March 1, 2024.

[4] https://www.bdcnetwork.com/georgia-pacific-pushes-forward-construction-newest-industrial-building-tennessee#:~:text=Georgia%2DPacific's%20%24425%20million%20manufacturing,single%20investment%20in%20Jackson's%20history. Georgia Pacific Jackson, TN production facility. Accessed February 28, 2024.

Table III-3
Paper plates: U.S. producers' reported changes in operations, since January 1, 2020

Item	Firm name and narrative response on changes in operations
Plant openings	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Weather-related or force majeure events	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' installed and practical capacity and production on the same equipment. During 2020-22 installed overall capacity, practical overall capacity, and reported practical paper plates capacity increased slightly. Similarly, overall production on the same equipment as in-scope paper plates production remained relatively stable during 2020-22 with overall production increasing by 8.8 percent and paper plates production increasing by 2.0 percent.[5] All reported capacity and production categories (except installed overall capacity) were lower in January-September 2023 ("interim 2023") compared to January-September 2022 ("interim 2022"). During 2020-22, installed overall capacity utilization fluctuated but decreased from 67.1 percent to 64.4 percent, practical overall capacity utilization fluctuated but decreased from 75.4 percent to 73.6 percent, and reported practical paper plates capacity decreased from 75.2 percent to 68.9 percent. Capacity utilization in all three categories was lower in interim 2023 compared to interim 2022.

[5] During 2020-22, *** increased its paper plates production capacity by nearly *** additional paper plates. ***.

Table III-4
Paper plates: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 paper plates; utilization in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Installed overall	Capacity	78,377,427	83,651,642	88,898,911	64,987,596	67,569,686
Installed overall	Production	52,598,884	56,258,979	57,208,271	42,902,113	38,324,125
Installed overall	Utilization	67.1	67.3	64.4	66.0	56.7
Practical overall	Capacity	69,754,463	73,539,627	77,747,368	57,405,505	56,639,101
Practical overall	Production	52,598,884	56,258,979	57,208,271	42,902,113	38,324,125
Practical overall	Utilization	75.4	76.5	73.6	74.7	67.7
Practical paper plates	Capacity	69,187,594	72,881,262	77,034,499	56,870,853	56,035,370
Practical paper plates	Production	52,047,167	52,654,637	53,095,143	39,875,376	35,413,584
Practical paper plates	Utilization	75.2	72.2	68.9	70.1	63.2

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

Table III-5 presents U.S. producers' reported narratives regarding practical capacity constraints. "Existing labor force" was the constraint mentioned by three producers and four producers cited "supply of material inputs" constraints, while *** cited "other constraints".

Table III-5
Paper plates: U.S. producers' reported capacity constraints since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Existing labor force	***.
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***.
Supply of material inputs	***
Supply of material inputs	***
Other constraints	***

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

Table III-6 and figure III-1 present U.S. producers' paper plate production, capacity, and capacity utilization. Practical capacity increased by 11.3 percent during 2020-22 and was 1.5 percent lower in interim 2023 than in interim 2022. Paper plates production increased by 2.0 percent from 2020 to 2022 and was 11.2 percent lower in interim 2023 than in interim 2022. Capacity utilization decreased from 75.2 percent to 68.9 percent from 2020 to 2022 and was 6.9 percentage points lower in interim 2023 than in interim 2022. During 2020-22, *** had the largest decrease in capacity utilization, which decreased by *** percentage points, while *** capacity utilization was lower by *** percentage points during interim 2023 compared to interim 2022.

Table III-6
Paper plates: U.S. producers' output, by firm and period

Practical capacity

Capacity in 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	69,187,594	72,881,262	77,034,499	56,870,853	56,035,370

Table continued.

Table III-6 Continued
Paper plates: U.S. producers' output, by firm and period

Production

Production in 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	52,047,167	52,654,637	53,095,143	39,875,376	35,413,584

Table continued.

Table III-6 Continued
Paper plates: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	75.2	72.2	68.9	70.1	63.2

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

Table continued.

Table III-6 Continued
Paper plates: U.S. producers' output, by firm and period

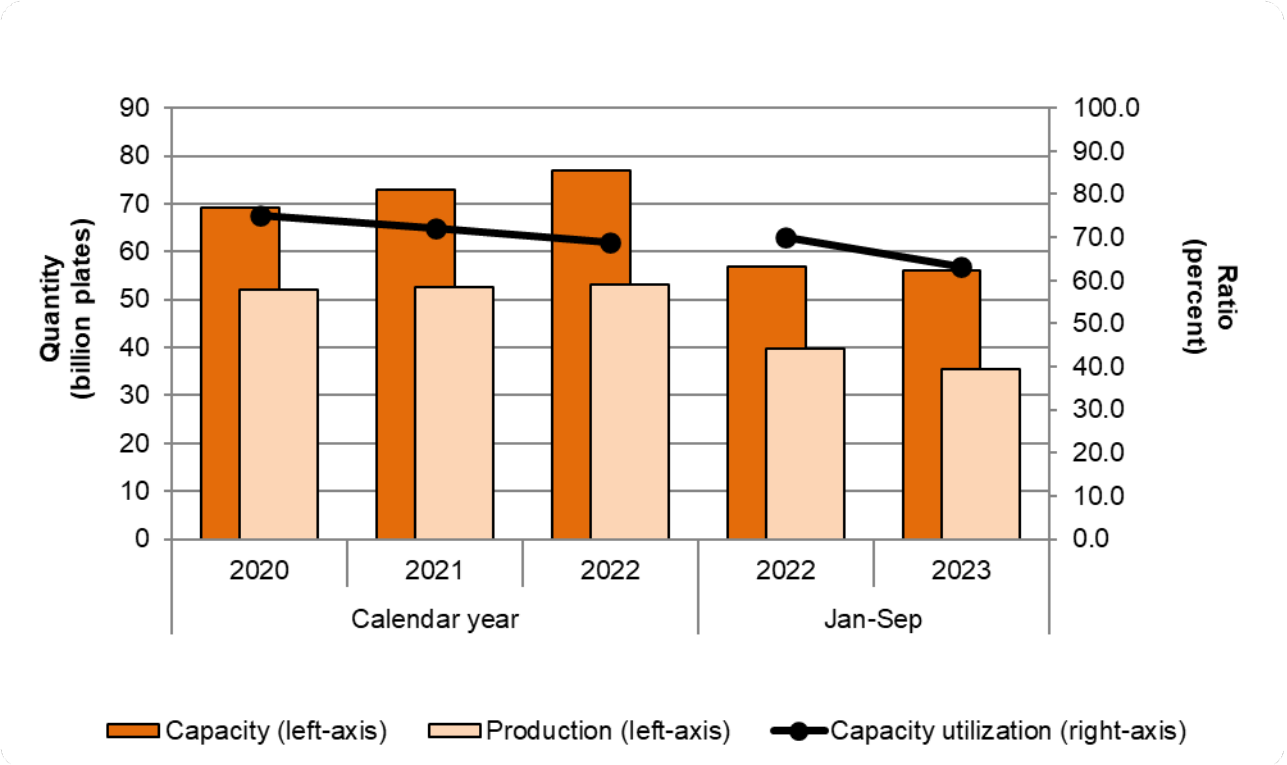
Share of production

Share in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure III-1
Paper plates: U.S. producers' output, by period



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

Alternative products

As shown in table III-7, *** U.S. producers reported that they produce *** on the same equipment that is used to produce paper plates. ***, which accounted for *** percent of total production on the same equipment in 2020, and *** percent in 2022. As a share of total

production, *** accounted for a lower percentage *** of total production on the same machinery during interim 2023 compared to interim 2022.

Table III-7
Paper plates: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in 1,000 paper plates; ratio and share in percent

Product type	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Paper plates	Quantity	***	***	***	***	***
Liquid fiber paper plates	Quantity	***	***	***	***	***
Other paper dishes	Quantity	***	***	***	***	***
Other liquid fiber dishes	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper plates	Share	***	***	***	***	***
Liquid fiber paper plates	Share	***	***	***	***	***
Other paper dishes	Share	***	***	***	***	***
Other liquid fiber dishes	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

U.S. producers' U.S. shipments and exports

Table III-8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments[6] decreased 3.0 percent by quantity from 2020-22, and were 4.4 percent lower in interim 2023 than in interim 2022. The unit value of U.S. shipments increased 33.8 percent from 2020-22, and was 11.4 percent higher in interim 2023 than in interim 2022. Export shipments increased *** percent from 2020-22, and were *** percent higher in interim

[6] *** in each full- and partial- year period.

2023 than in interim 2022.[7] The unit value of U.S. producers' export shipments increased *** percent from 2020-22, and was *** percent higher in interim 2023 than in interim 2022.[8] U.S. shipments by quantity were at their highest levels in 2021, while they were at their highest levels by value in 2022.

Most U.S. shipments were of commercial shipments; in no period was the share of U.S. shipments accounted for by commercial shipments lower than *** percent.

[7] Four firms (***) had exports during the period for which data were collected.

[8] Export shipments comprised no more than *** percent of total shipments from 2020-22, and comprised *** percent of total shipments in interim 2023. Four U.S. producers exported paper plates throughout the period, with *** being the most reported destinations.

Table III-8
Paper plates: U.S. producers' shipments, by destination and period

Quantity in 1,000 paper plates; value in 1,000 dollars; unit value in dollars per 1,000 paper plates; shares in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
U.S. shipments	Quantity	52,285,157	52,460,822	50,691,263	37,811,799	36,151,231
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	2,044,812	2,244,516	2,651,777	1,923,229	2,047,704
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	39.11	42.78	52.31	50.86	56.64
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

U.S. producers' inventories

Table III-9 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments**.** U.S. producers' inventories increased *** percent from 2020-22, with all of the increase in 2022, but were *** percent lower between interim 2023 and interim 2022. Inventories as a ratio to U.S. production increased *** percentage points from 2020-22, but were *** percentage points lower in interim 2023 than in interim 2022. Inventories as a ratio to U.S. shipments and total shipments both increased *** percentage points from 2020-22, and were both *** percentage points higher in interim 2023 than in interim 2022.

Table III-9
Paper plates: U.S. producers' inventories and their ratio to select items, by period

Quantity in paper plates; ratio in percent

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

U.S. producers' imports of paper plates are presented in tables III-10 and III-11. Two U.S. producers (***) reported importing directly during 2020-22, and during the interim periods 2022 and 2023. ***.

Table III-10
Paper plates: * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity 1,000 paper plates; ratio in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China to U.S. production	Ratio	***	***	***	***	***

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

Table III-11
Paper plates: * U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 paper plates; ratio in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from Vietnam	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from China to U.S. production	Ratio	***	***	***	***	***
Imports from Vietnam to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***

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

U.S. producers' reasons for importing paper plates are presented in table III-12.

Table III-12
Paper plates: U.S. producers' reasons for importing

Item	Narrative response on reasons for importing
***'s reason for importing	***
***'s reason for importing	***

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

U.S. producers' purchases of imports from subject sources

*** U.S. producers' reported purchases of imports from subject sources.

U.S. employment, wages, and productivity

Table III-13 shows U.S. producers' employment-related data. While most metrics showed increases from 2020-22, most declined between interim 2022 and interim 2023. PRWs increased by *** percent from 2020-22[9], but were *** percent lower in interim 2023 than in interim 2022. Hours worked increased by *** percent from 2020-22, but were *** percent lower in interim 2023 than in interim 2022. Wages paid and hourly wages increased *** percent and *** percent, respectively from 2020-22, but were *** percent lower and hourly wages ***, in interim 2023 than in interim 2022. Productivity decreased by *** percent from 2020-22, and was *** percent lower in interim 2023 than in interim 2022. Unit labor costs

[9] During 2020-22, ***. During 2020-22, U.S. producers combined ***.

increased *** percent from 2020-22, and were *** percent higher in interim 2023 than in interim 2022.

Table III-13
Paper plates: U.S. producers' employment related information, by period

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (plates per hour)	***	***	***	***	***
Unit labor costs (dollars per 1,000 plates)	***	***	***	***	***

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

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

U.S. importers

The Commission issued importer questionnaires to 125 firms believed to be importers of subject paper plates, as well as to all U.S. producers of paper plates.[1] Usable questionnaire responses were received from 14 companies,[2] representing the following percentages of U.S. imports from China, Thailand, Vietnam, and other sources in 2022 under HTS statistical reporting number 4823.69.0040, a "basket" category.[3] [4]

- China: *** percent
- Thailand: *** percent
- Vietnam: *** percent
- Subject sources: *** percent
- Nonsubject sources: *** percent[5]
- All import sources: *** percent

Table IV-1 lists all responding U.S. importers of paper plates from China, Thailand, Vietnam, and other sources, their locations, and their shares of U.S. imports, in 2022.

[1] The Commission issued questionnaires to those firms identified in the petitions; staff research; and proprietary, Census-edited Customs' import records.

[2] Three firms responded that they did not import paper plates into the United States during the period of investigations.

[3] The coverage figures provided are a comparison of import data provided in questionnaire responses to official import statistics adjusted to remove out-of-scope imports that entered the U.S. under statistical reporting number 4823.69.0040 using data submitted in Commission questionnaires and using proprietary, Census-edited Customs records for firms that submitted a certified "No" questionnaire response. Additionally, these coverage figures provided are based on weight (1,000 pounds), obtained from Census-edited Customs records being reported in weight for entries under HTS statistical reporting number 4823.69.0040.

[4] Based on the questionnaire responses from the responding firms, out-of-scope imports reported under HTS statistical reporting number 4823.69.0040 accounted for approximately 20 percent of all reported imports under HTS statistical reporting number 4823.69.0040 during 2022.

[5] The coverage figures provided for nonsubject sources may be underreported due to the lack of available, reported questionnaire data for paper plates from nonsubject sources.

Table IV-1
Paper plates: U.S. importers, their headquarters, and share of imports within each source, 2022

Share in percent

Firm	Head-quarters	China	Thailand	Vietnam	Subject sources	Non subject sources	All import sources
Acadian Crossing	San Antonio, TX	***	***	***	***	***	***
Amazon Services	Seattle, WA	***	***	***	***	***	***
Brand Buzz	New York, NY	***	***	***	***	***	***
Confetti Collective	Chevy Chase, MD	***	***	***	***	***	***
Discount Party Supplies	Jackson, MI	***	***	***	***	***	***
Dollar General	Goodlettsville, TN	***	***	***	***	***	***
Dollar Tree	Chesapeake, VA	***	***	***	***	***	***
Haynes Besco	Franklin, TN	***	***	***	***	***	***
HEB Grocery	San Antonio, TX	***	***	***	***	***	***
Hoffmaster	Oshkosh, WI	***	***	***	***	***	***
Juvo Plus	Seattle, WA	***	***	***	***	***	***
Talking Tables	New York, NY	***	***	***	***	***	***
Unique Industries	Philadelphia, PA	***	***	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0	100.0

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

U.S. imports

Table IV-2 presents data for U.S. imports of paper plates from China,[6] Thailand, and Vietnam and all other sources. Subject imports, by quantity, increased by *** percent from 2020 to 2022, largely driven by imports from China. Subject imports' values increased by *** percent from 2020-22, while unit values decreased by *** percent during the same period. Quantities, values, and unit values for imports from nonsubject sources all increased from 2020-22. During 2020-22, subject import quantities and values were higher in interim 2023 compared to interim 2022, while unit values were lower. Subject sources' share of imports

[6] During 2022, *** accounted for the majority *** of reported imports of paper plates from China. ***. Email correspondence with ***, February 23, 2024.

increased based on quantity and by value during 2020-22, and were higher based on quantity and value during interim 2023 than during interim 2022.

U.S. subject imports of paper plates from China, the largest subject source, by quantity, increased by *** percent during 2020-22 and were *** percent higher in interim 2023 compared to interim 2022. They decreased, on a quantity basis, as a share of total imports from *** percent in 2020 to *** percent in 2022 and were lower in interim 2023 (*** percent) compared to interim 2022 (*** percent). U.S. subject imports of paper plates from China as a share of U.S. production increased by *** percent during 2020-22 and were *** percent higher in interim 2023 compared to interim 2022.

U.S. subject imports of paper plates from Thailand increased by *** percent during 2020-22 and were *** percent higher in interim 2023 compared to interim 2022.[7] They increased, on a quantity basis, as a share of total imports from *** percent in 2020 to *** percent in 2022 and were higher in interim 2023 (*** percent) compared to interim 2022 (*** percent). As a share of U.S. production, U.S. imports of paper plates from Thailand increased from *** percent to *** percent during 2020-22 and were *** percent higher in interim 2023 compared to interim 2022.

U.S. subject imports of paper plates from Vietnam increased by *** percent during 2020-22 but were *** percent lower in interim 2023 compared to interim 2022.[8] They increased, on a quantity basis, as a share of total imports from *** percent in 2020 to *** percent in 2022 but were lower in interim 2023 (*** percent) compared to interim 2022 (*** percent). As a share of U.S. production, U.S. imports of paper plates increased from Vietnam *** percent in 2020 to *** percent in 2022 and were *** percent in interim 2023 and during interim 2022.

Unit values for of U.S. subject imports of paper plates generally decreased during 2020-22 while the unit values for nonsubject imports increased until the interim 2023 period when they were lower. Unit values of subject imports from China decreased by *** percent from 2020 to 2022 and were *** percent lower in in interim 2023 compared to interim 2022. Unit values for imports of paper plates from Thailand increased by *** percent during 2020-22. For imports from Thailand, unit values were *** percent lower in interim 2023 compared to interim 2022. Unit values for imports of paper plates from Vietnam decreased by *** percent during 2020-22, and were *** percent lower in interim 2023, compared to interim 2022. Unit values

[7] The increase of U.S. imports of paper plates from Thailand during 2022 was largely attributed to ***.

[8] The increase of U.S. imports of paper plates from Vietnam during 2022 was largely attributed to ***.

for imports from nonsubject sources increased by *** percent from 2020-22, but were *** percent lower in interim 2023, compared to interim 2022.

Table IV-2
Paper plates: U.S. imports by source and period

Quantity in 1,000 paper plates; value in 1,000 dollars; unit value in dollars per 1,000 plates

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	320,215	759,891	2,907,371	2,109,645	2,488,501
China	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	18,929	38,341	116,037	84,487	90,001
China	Unit value	***	***	***	***	***
Thailand	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	59.11	50.46	39.91	40.05	36.17

Table continued on next page.

Table IV-2 Continued
Paper plates: Share of U.S. imports by source and period

Share and ratio in percent

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
China	Share of quantity	***	***	***	***	***
Thailand	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	0.6	1.4	5.5	5.3	7.0

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

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

Table IV-3
Paper plates: Change in import quantity, values, unit values between comparison periods

Source	Measure	2020-22	2020-21	2021-22	Jan-Sep 2022-23
China	%Δ Quantity	▲***	▲***	▲***	▲***
Thailand	%Δ Quantity	▲***	▼***	▲***	▲***
Vietnam	%Δ Quantity	▲***	▲***	▲***	▼***
Subject sources	%Δ Quantity	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Quantity	▲***	▲***	▲***	▼***
All import sources	%Δ Quantity	▲807.9	▲137.3	▲282.6	▲18.0
China	%Δ Value	▲***	▲***	▲***	▲***
Thailand	%Δ Value	▲***	▼***	▲***	▲***
Vietnam	%Δ Value	▲***	▲***	▲***	▼***
Subject sources	%Δ Value	▲***	▲***	▲***	▲***
Nonsubject sources	%Δ Value	▲***	▲***	▲***	▼***
All import sources	%Δ Value	▲513.0	▲102.5	▲202.6	▲6.5
China	%Δ Unit value	▼***	▼***	▼***	▼***
Thailand	%Δ Unit value	▲***	▲***	▲***	▼***
Vietnam	%Δ Unit value	▼***	▼***	▼***	▼***
Subject sources	%Δ Unit value	▼***	▼***	▼***	▼***
Nonsubject sources	%Δ Unit value	▲***	▲***	▲***	▼***
All import sources	%Δ Unit value	▼(32.5)	▼(14.6)	▼(20.9)	▼(9.7)

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

Note: Percent changes shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Figure IV-1
Paper plates: U.S. import quantities and average unit values, by source and period

* * * * * * *

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

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[9] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[10] Table IV-4 presents information on imports from China, Thailand, and Vietnam and all other sources the 12-month period preceding the filing of the petition (i.e., January 2023 through December 2023). Imports from China, Thailand, and Vietnam accounted for *** percent, *** percent, and *** percent, respectively, of total imports of paper plates by quantity during this period, while imports of paper plates from all other sources accounted for *** percent.

[9] Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

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

Table IV-4
Paper plates: U.S. imports in the twelve-month period preceding the filing of the petition, January 2023 to December 2023

Quantity in 1,000 paper plates; share in percent

Source of imports	Quantity	Share of quantity
China	***	***
Thailand	***	***
Vietnam	***	***
All other sources	***	***
All import sources	***	***

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

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

Cumulation considerations

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

Fungibility

Table IV-5 and figure IV-2 present information on U.S. producers' and U.S. importers' U.S. shipments of paper plates by source and width – less than or equal to 7.5 inch paper plates, greater than 7.5 inch to 9.0 inch paper plates, and greater than 9.0 inch paper plates.

U.S. producers and U.S. importers shipped paper plates in all three width ranges during 2022. Shipments of imports from both subject and nonsubject sources also included all three width ranges. For both U.S. producers and U.S. importers, U.S. shipments of paper plates *** accounted for the largest share of U.S. shipments of paper plates during 2022.

Table IV-5
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and width, 2022

Quantity in 1,000 plates.

Source	≤7.5 inches	>7.5 inches to ≤9.0 inches	>9.0 inches	All widths
U.S. producers	***	***	***	***
China	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued

Table IV-5--Continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and width, 2022

Share across in percent

Source	≤7.5 inches	>7.5 inches to ≤9.0 inches	>9.0 inches	All widths
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
Thailand	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-5--Continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and width, 2022

Share down in percent

Source	≤7.5 inches	>7.5 inches to ≤9.0 inches	>9.0 inches	All widths
U.S. producers	***	***	***	***
China	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

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

Figure IV-2
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and width, 2022

* * * * * * *

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

Table IV-6 and figure IV-3 present information on U.S. producers' and U.S. importers' U.S. shipments of paper plates by source and by color—solid white or other colors during 2022. U.S. producers shipped paper plates in both other colors and plain white during 2022. During 2022, U.S. importers' U.S. shipments of ***. For U.S. producers and subject U.S. importers, U.S. shipments *** accounted for the largest share of U.S. shipments of paper plates during 2022.

Table IV-6
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by color, 2022

Quantity in 1,000 plates

Source	Solid white	Other colors	All colors
U.S. producers	***	***	***
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table IV-6--continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by color, 2022

Share across in percent.

Source	Solid white	Other colors	All colors
U.S. producers	***	***	100.0
China	***	***	100.0
Thailand	***	***	100.0
Vietnam	***	***	100.0
Subject sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table IV-6--continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by color, 2022

Share down in percent

Source	Solid white	Other colors	All colors
U.S. producers	***	***	***
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

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

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

Figure IV-3
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by color, 2022

* * * * * * *

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

Table IV-7 and figure IV-4 present information on U.S. producers' and U.S. importers' U.S. shipments of paper plates by source and branding types—private label or branded label during 2022. U.S. producers shipped paper plates that were private label and branded label during 2022. ***. During 2022, nonsubject U.S. importers' U.S. shipments of ***.

Table IV-7
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by branding type, 2022

Quantity in 1,000 plates

Source	Branded	Private label	All brandings
U.S. producers	***	***	***
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table IV-7 Continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by branding type, 2022

Share across in percent

Source	Branded	Private label	All brandings
U.S. producers	***	***	100.0
China	***	***	100.0
Thailand	***	***	100.0
Vietnam	***	***	100.0
Subject sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table IV-7 Continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by branding type, 2022

Share down in percent

Source	Branded	Private label	All brandings
U.S. producers	***	***	***
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

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

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

Figure IV-4
Paper plates: U.S. producers' and U.S. importers' U.S. shipments by source and by branding type, 2022

* * * * * * *

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

Geographical markets

Paper plates produced in the United States are shipped nationwide.[11] In 2022, official import statistics show that more than half of U.S. imports of paper plates from subject sources entered through the Eastern border of entry of the United States, followed by the Western and Southern borders of entry with 27.7 and 12.4 percent, respectively. Imports from China entered mostly (49.9 percent) through the Eastern border of entry; 68.3 percent of U.S. imports of paper plates from Vietnam entered through the Eastern border of entry; and with respect to imports from Thailand, the largest portion entered through the Eastern border of entry. There were no imports from Vietnam through the Northern border of entry. Table IV-8 presents U.S. import quantities of paper plates by sources and border of entry during 2022.

[11] See Part II for additional information on geographic markets.

Table IV-8
Paper plates: U.S. imports by source and border of entry, 2022

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
China	78,812	14,922	19,775	44,275	157,784
Thailand	2,129	1,438	836	900	5,304
Vietnam	4,176	---	324	1,611	6,111
Subject sources	85,117	16,361	20,935	46,786	169,199
Nonsubject sources	6,603	2,339	4,095	19,557	32,594
All import sources	91,720	18,699	25,031	66,343	201,793

Table continued.

Table IV-8--Continued
Paper plates: U.S. imports by source and border of entry, 2022

Share across in percent

Source	East	North	South	West	All borders
China	49.9	9.5	12.5	28.1	100.0
Thailand	40.1	27.1	15.8	17.0	100.0
Vietnam	68.3	---	5.3	26.4	100.0
Subject sources	50.3	9.7	12.4	27.7	100.0
Nonsubject sources	20.3	7.2	12.6	60.0	100.0
All import sources	45.5	9.3	12.4	32.9	100.0

Table continued.

Table IV-8--Continued
Paper plates: U.S. imports by source and border of entry, 2022

Share down in percent

Source	East	North	South	West	All borders
China	85.9	79.8	79.0	66.7	78.2
Thailand	2.3	7.7	3.3	1.4	2.6
Vietnam	4.6	---	1.3	2.4	3.0
Subject sources	92.8	87.5	83.6	70.5	83.8
Nonsubject sources	7.2	12.5	16.4	29.5	16.2
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 7, 2024. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data are likely overstated due to out-of-scope products under the HTS statistical reporting number.

Presence in the market

Table IV-9 and figures IV-5 and IV-6 present monthly official U.S. import statistics for subject countries and nonsubject sources. U.S. imports from China and Vietnam were present during all months from January 2020 to September 2023, while U.S. imports of paper plates from Thailand were present in all but 10 months during the same period.

Table IV-9
Paper plates: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	China	Thailand	Vietnam	Subject sources	Nonsubject sources	All import sources
2020	January	6,542	25	754	7,321	1,340	8,661
2020	February	5,082	---	511	5,594	1,447	7,041
2020	March	2,732	94	569	3,395	2,195	5,590
2020	April	4,992	31	176	5,199	1,873	7,072
2020	May	3,545	27	54	3,626	1,366	4,991
2020	June	4,451	---	36	4,486	1,481	5,967
2020	July	5,244	---	100	5,344	1,485	6,828
2020	August	4,694	5	51	4,750	941	5,690
2020	September	6,099	81	163	6,342	1,200	7,542
2020	October	6,640	32	342	7,014	1,573	8,587
2020	November	6,364	234	149	6,746	1,572	8,319
2020	December	4,914	51	107	5,071	1,794	6,865
2021	January	6,330	34	62	6,426	1,812	8,238
2021	February	5,147	---	41	5,188	1,542	6,731
2021	March	6,266	---	533	6,799	2,201	9,000
2021	April	6,779	41	94	6,914	1,985	8,899
2021	May	6,413	7	11	6,431	2,632	9,064
2021	June	6,606	30	79	6,715	2,772	9,487
2021	July	7,364	---	341	7,705	2,226	9,932
2021	August	7,130	---	157	7,287	2,223	9,510
2021	September	9,119	---	740	9,859	2,308	12,167
2021	October	7,966	72	483	8,521	2,899	11,420
2021	November	7,079	---	293	7,372	2,229	9,601
2021	December	9,285	54	164	9,503	2,523	12,026

Table continued.

Table IV-9--Continued
Paper plates: Quantity of U.S. imports, by source and month

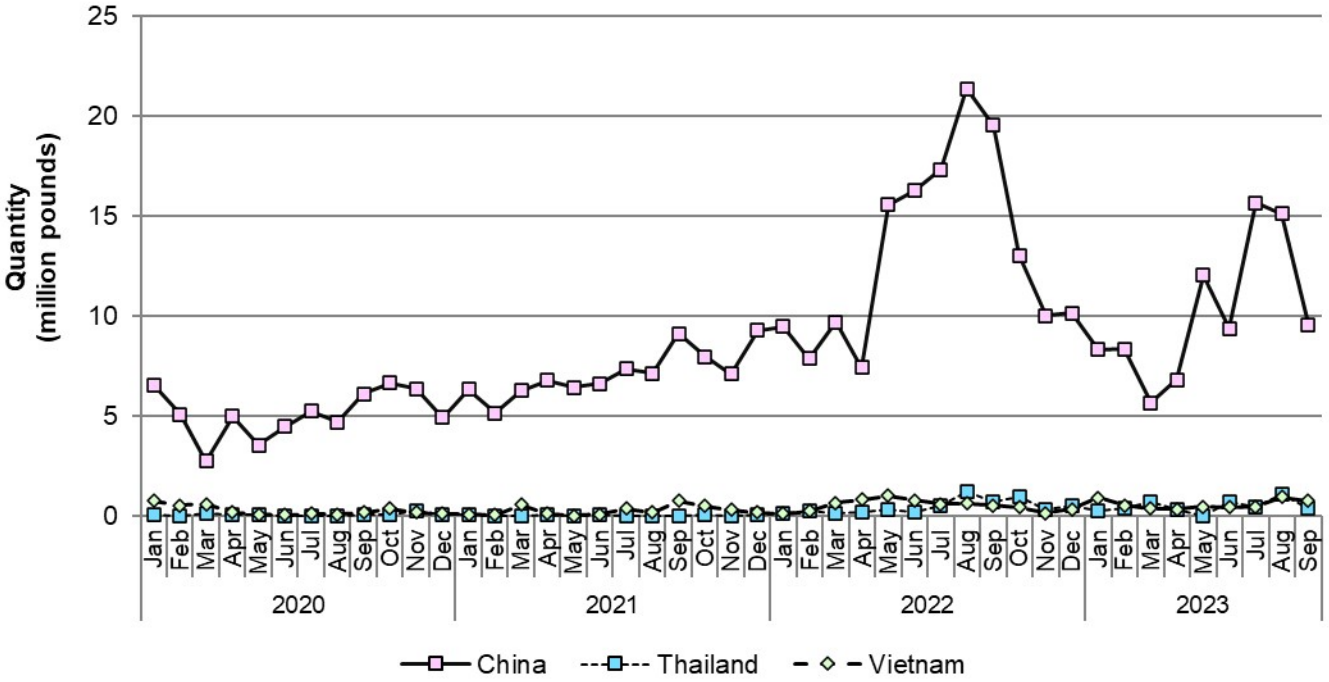
Quantity in 1,000 pounds

Year	Month	China	Thailand	Vietnam	Subject sources	Nonsubject sources	All import sources
2022	January	9,475	107	100	9,683	2,420	12,103
2022	February	7,876	234	236	8,346	2,448	10,794
2022	March	9,682	122	633	10,438	3,445	13,882
2022	April	7,430	163	818	8,411	2,517	10,928
2022	May	15,578	314	999	16,891	3,381	20,272
2022	June	16,284	187	781	17,252	2,965	20,217
2022	July	17,325	482	568	18,375	2,566	20,941
2022	August	21,365	1,212	618	23,194	2,457	25,651
2022	September	19,541	710	517	20,768	2,701	23,469
2022	October	13,045	957	406	14,409	2,757	17,166
2022	November	10,031	315	127	10,473	2,851	13,325
2022	December	10,152	498	308	10,959	2,086	13,044
2023	January	8,310	234	890	9,433	3,177	12,610
2023	February	8,342	363	520	9,225	2,114	11,339
2023	March	5,661	712	358	6,731	2,750	9,481
2023	April	6,818	298	316	7,433	3,087	10,519
2023	May	12,049	---	449	12,498	2,183	14,681
2023	June	9,363	724	424	10,510	2,862	13,372
2023	July	15,668	450	452	16,570	2,924	19,494
2023	August	15,102	1,046	932	17,079	3,265	20,344
2023	September	9,579	364	748	10,691	3,279	13,970

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 7, 2024. Imports are based on the imports for consumption data series.

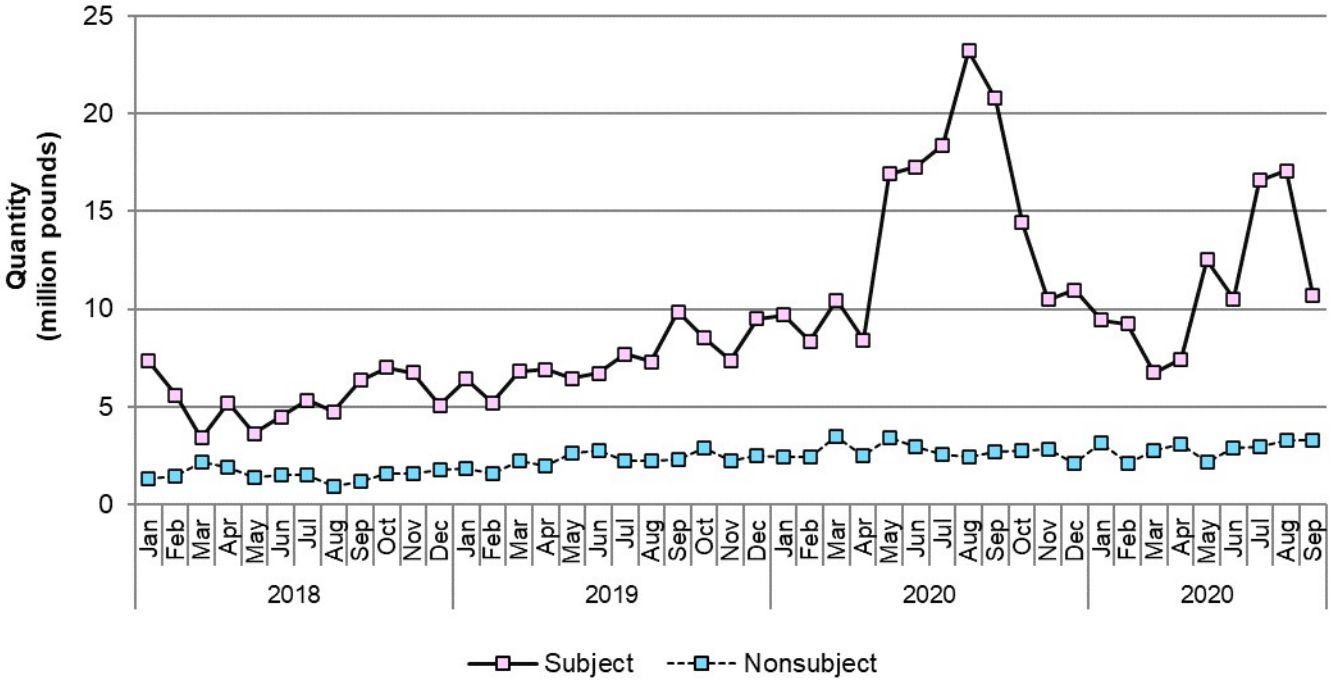
Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data are likely overstated due to out-of-scope products under the HTS statistical reporting number.

Figure IV-5
Paper plates: U.S. imports from individual subject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 7, 2024. Imports are based on the imports for consumption data series.

Figure IV-6
Paper plates: U.S. imports from aggregated subject and nonsubject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 7, 2024. Imports are based on the imports for consumption data series.

Apparent U.S. consumption and market shares

Quantity

Table IV-10 presents data on apparent U.S. consumption and U.S. market shares by quantity for paper plates. Table IV-10 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares by quantity for paper plates for the total U. S. market while table IV-11 and figure IV-8 present data on apparent U.S. consumption and U.S. market shares by value for paper plates for the U. S. market.

During 2020-22, apparent U.S. consumption, by quantity, increased 1.3 percent, however it was 3.8 percent lower in interim 2023 compared to interim 2022. U.S. producers' market share decreased from 99.5 percent to 95.1 percent during 2020-22 and it was lower, by 0.6 percentage points in interim 2023 compared to interim 2022. The market share of subject imports increased by *** percentage points during 2020-22 and was higher, by *** percentage points, in interim 2023 compared to interim 2022. During 2020-22, the market shares of subject import from China increased by *** percentage points, while the market shares of subject

imports from Thailand and Vietnam increased by *** percentage points and *** percentage points, respectively. Market shares of imports from all subject sources were higher in interim 2023 compared to interim 2022. Nonsubject imports of paper plates accounted for *** share of quantity during 2020-22 and during the interim periods.

Table IV-10
Paper plates: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 plates; shares in percent

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
U.S. producers	Quantity	52,285,157	52,460,822	50,691,263	37,811,799	36,151,231
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	287,545	771,119	2,586,931	1,938,133	2,097,430
All sources	Quantity	52,572,702	53,231,941	53,278,194	39,749,932	38,248,661
U.S. producers	Share	99.5	98.6	95.1	95.1	94.5
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	0.5	1.4	4.9	4.9	5.5
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

Figure IV-7
Paper plates: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Value

Table IV-11 and figure IV-8 present data on apparent U.S. consumption and U.S. market shares by value for paper plates. Apparent U.S. consumption, by value, increased 33.7 percent during 2020-22, and was 6.4 percent higher in interim 2023 compared to interim 2022. U.S. producers' market share decreased from 98.6 percent to 95.6 percent during 2020-22, but was higher in interim 2023 by 0.1 percent compared to interim 2022. The market share of subject imports increased by *** percentage points during 2020-22, but was lower by *** percentage points in interim 2023 compared to interim 2022.

During 2020-22, the market share of subject imports from China increased by *** percentage points, the market share of subject imports from Thailand increased by *** percentage points, and the market share of subject imports Vietnam increased by *** percentage points. Market shares of imports from China were lower in interim 2023 compared to interim 2022, while Thailand and Vietnam's market shares *** or were higher. Market shares of imports from nonsubject sources of paper plates *** during 2020-22, and during the interim periods.

Table IV-11
Paper plates: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
U.S. producers	Value	2,044,812	2,244,516	2,651,777	1,923,229	2,047,704
China	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	29,253	58,740	120,791	90,612	94,259
All sources	Value	2,074,065	2,303,256	2,772,568	2,013,841	2,141,963
U.S. producers	Share	98.6	97.4	95.6	95.5	95.6
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	1.4	2.6	4.4	4.5	4.4
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

Figure IV-8
Paper plates: Apparent U.S. consumption based on value, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Part V: Pricing data

Factors affecting prices

Raw material costs

Raw materials account for a large share of U.S. producers' cost of producing paper plates. During 2020 to 2022, raw materials as a percentage of cost of goods sold rose from *** percent to *** percent of the cost of goods sold for paper plates. Raw materials as a percentage of costs of goods sold was *** percent in January-September 2023, down from *** percent in the same period of 2022.

The principal raw material used in production of paper plates is principally paperboard.[1] The producer price index ("PPI") for paperboard is shown in table V-1 and figure V-1. This PPI was mostly flat in 2020. However, from September 2020 to November 2022, it rose to a level 38 percent above its January 2020 level. After November 2022, it decreased, resulting in an overall increase of 28 percent from January 2020- September 2023 or 26 percent from January 2020-December 2023.[2]

Table V-1
Raw materials: Paperboard, producer price index, monthly, not seasonally adjusted, January 2020-December 2023

Index, January 2020=100

Year	Month	Paperboard producer price index
2020	January	100.0
2020	February	99.0
2020	March	98.8
2020	April	98.5
2020	May	98.7
2020	June	98.3
2020	July	98.9
2020	August	99.0
2020	September	98.6

Table continued.

[1] Petition, p. 6.

[2] These trends are similar to ***. See Petitioners' postconference brief, exhibit 11.

Table V-1 Continued
Raw materials costs: Paperboard, producer price index, monthly, not seasonally adjusted, January 2020-December 2023

Index, January 2020=100

Year	Month	Paperboard producer price index
2020	October	99.0
2020	November	99.0
2020	December	101.0
2021	January	104.5
2021	February	106.0
2021	March	106.3
2021	April	108.3
2021	May	111.7
2021	June	113.4
2021	July	115.4
2021	August	117.6
2021	September	119.1
2021	October	123.7
2021	November	124.0
2021	December	124.9
2022	January	125.5
2022	February	127.3
2022	March	128.9
2022	April	131.4
2022	May	132.8
2022	June	136.7
2022	July	137.6
2022	August	137.6
2022	September	137.7
2022	October	138.1
2022	November	138.4
2022	December	137.7

Table continued.

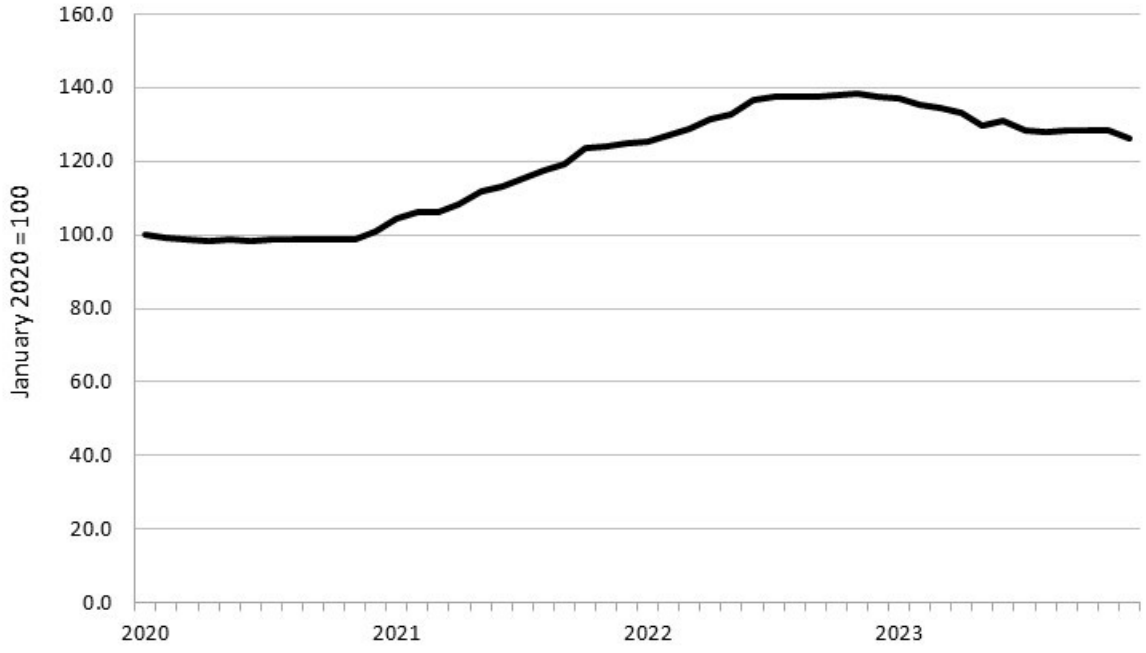
Table V-1 Continued
Raw materials costs: Paperboard, producer price index, monthly, not seasonally adjusted, January 2020-December 2023

Index, January 2020=100

2023	January	137.0
2023	February	135.6
2023	March	134.4
2023	April	133.3
2023	May	129.9
2023	June	131.1
2023	July	128.3
2023	August	127.9
2023	September	128.5
2023	October	128.5
2023	November	128.4
2023	December	126.4

Source: Bureau of Labor Statistics via Federal Reserve Bank of St. Louis, retrieved January 31, 2024, and staff calculations.

Figure V-1
Raw materials: Producer price index, paperboard, January 2020-December 2023



Source: Bureau of Labor Statistics via Federal Reserve Bank of St. Louis, retrieved January 31, 2024, and staff calculations.

U.S. producers and importers were asked about the trends in raw material costs since January 1, 2020. Six U.S. producers and seven importers described raw material costs as increasing steadily. One U.S. producer and five importers described raw material costs as increasing with fluctuations. Three U.S. producers estimated that paperboard costs increased 50 to 60 percent since January 1, 2020. *** also described the costs of film and wrapping as having increased. Three U.S. producers and importer *** also stated that they were unable to increase paper plate prices to cover the increased costs of raw materials due to competition from subject imports. Importer *** described the raw material used for U.S. paper plates as solid bleach sulfates (SBS) paperboard, while Asian paper plates are made from folding box board (FBB) cartonboard. It described FBB as having higher yield for paper plate production but similar performance for paper plate use. It continued that North American SBS costs have risen, while Asian FBB costs have not.[3]

Transportation costs to the U.S. market

Transportation costs for paper plates shipped from subject countries to the United States averaged 18.5 percent for China, 8.9 percent for Thailand, and 22.8 percent for Vietnam during 2022. These estimates were derived from official import data and represent the transportation and other charges on imports.[4]

U.S. inland transportation costs

Six responding U.S. producers and 10 importers reported that they typically arrange transportation to their customers, while one U.S. producer and four importers stated that their customers did.[5] Most U.S. producers reported that their U.S. inland transportation costs ranged from *** to *** percent while most importers reported costs of *** to *** percent. *** indicated that *** U.S. inland transportation costs were *** percent, and *** reported *** such costs were *** percent.

[3] See also ***.

[4] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2022 and then dividing by the customs value based on the HTS statistical reporting number 4823.69.0040.

[5] Thirteen importers indicated that they shipped paper plates from a storage facility, while one stated that it shipped from its point of importation.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using a wide range of methods including transaction-by-transaction negotiations, contracts, and price lists (table V-2).

Table V-2
Paper plates: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Importers
Transaction-by-transaction	5	4
Contract	4	4
Set price list	5	7
Other	0	3
Responding firms	7	14

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed. Importers reporting "other" methods indicated that these methods included comparisons to other suppliers' prices.

U.S. producers reported selling a plurality of their sales as spot sales, while importers reported selling most of their paper plates under long-term contracts (table V-3).

Table V-3
Paper plates: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022

Share in percent

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

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

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

U.S. producers' short-term contracts were for 90-180 days, while long-term contracts were generally for two years. *** reported contract lengths, with *** short-term contracts at *** months and *** long-term contracts at *** years.

U.S. producers' and importers' contracts generally fixed price but not quantity. U.S. producers were split on whether their contracts were fixed to an index of raw material costs, usually an index of paper or paperboard costs. However, importers' contracts generally were

not fixed to an index of raw material costs.[6] U.S. producer and importers were split on whether their contracts allowed price renegotiation.

Sales terms and discounts

U.S. producers typically quote prices on a delivered basis. Among importers, nine quoted prices on an f.o.b. point of shipment basis only, three on a delivered basis, and two on both bases. Regarding discounts, three U.S. producers and nine importers indicated that they had no discount policy, three U.S. producers and one importer indicated that they offered total volume discounts, and one U.S. producer and two importers indicated that they offered quantity discounts. Two U.S. producers and four importers offered other discounts, including for payment terms, brand promotion, inventory clearance, and holidays.

Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following paper plates products shipped to unrelated U.S. customers during January 2020-September 2023. Firms that imported these products from China, Thailand, and/or Vietnam for retail sale were requested to provide import purchase cost data.

Product 1.--8.375”-9.0” round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Product 2.--8.375” – 8.75” round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale.

Product 3.--10.0” – 10.25” round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale.

Product 4.--7.0” round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale.

[6] One importer (***) indicated that its contracts were indexed to ***.

Price data

Seven U.S. producers and two importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[7] Pricing data reported by these firms accounted for approximately 18.5 percent of U.S. producers' shipments of paper plates, *** percent of U.S. imports from China in 2022, *** percent of imports from Thailand in 2022, and *** percent of imports from Vietnam in 2022.

Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-2 to V-5.

Table V-4
Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter

Price in dollars per 1,000 paper plates, quantity in 1,000 paper plates.

Period	US price	US quantity
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***
2023 Q3	***	***

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

Note: Product 1: 8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale. No responses were received from importers for this product.

[7] Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

Table V-5
Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter

Price in dollars per 1,000 paper plates, quantity in 1,000 paper plates.

Period	US price	US quantity
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***
2023 Q3	***	***

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

Note: Product 2: 8.375” – 8.75” round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale. No responses were received from importers for this product.

Table V-6
Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter

Price in dollars per 1,000 paper plates, quantity in 1,000 paper plates, margin in percent.

Period	US price	US quantity	China price	China quantity	China margin	Thailand price	Thailand quantity	Thailand margin
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***

Period	Vietnam price	Vietnam quantity	Vietnam margin
2020 Q1	***	***	***
2020 Q2	***	***	***
2020 Q3	***	***	***
2020 Q4	***	***	***
2021 Q1	***	***	***
2021 Q2	***	***	***
2021 Q3	***	***	***
2021 Q4	***	***	***
2022 Q1	***	***	***
2022 Q2	***	***	***
2022 Q3	***	***	***
2022 Q4	***	***	***
2023 Q1	***	***	***
2023 Q2	***	***	***
2023 Q3	***	***	***

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

Note: Product 3: 10.0” – 10.25” round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale.

Table V-7
Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter

Price in dollars per 1,000 paper plates, quantity in 1,000 paper plates, margin in percent.

Period	US price	US quantity	China price	China quantity	China margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

Note: Product 4: 7.0” round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale.

Figure V-2
Paper plates: Weighted-average prices and quantities of domestic and imported product 1, by quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: 8.375”-9.0” round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Figure V-3
Paper plates: Weighted-average prices and quantities of domestic and imported product 2, by quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: 8.375” – 8.75” round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale.

Figure V-4
Paper plates: Weighted-average prices and quantities of domestic and imported product 3, by quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: 10.0” – 10.25” round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale.

Figure V-5
Paper plates: Weighted-average prices and quantities of domestic and imported product 4, by quarter

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: 7.0” round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale.

Import purchase cost data

*** reported useable import purchase cost data for products 1-2. Purchase cost data reported by *** accounted for *** percent of imports from China in 2022. Landed duty paid purchase cost data for imports from China are presented in tables V-8 to V-9, along with U.S. producers' sales prices.[8]

***.

***.

Firms were also asked whether the import cost (both excluding and including additional costs) of paper plates they imported are lower than the price of purchasing paper plates from a U.S. producer or importer. ***.[9]

[8] LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

[9] ***.

Table V-8
Paper plates: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter

Price and LDP value in dollars per 1,000 paper plates, quantity in 1,000 paper plates, margin and price-cost differential in percent.

Period	US price	US quantity	China price	China quantity	China margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

Note: Product 1: 8.375”-9.0” round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Note: U.S. producer price data is the same as that presented in table V-4.

Table V-9
Paper plates: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter

Price and LDP value in dollars per 1,000 paper plates, quantity in 1,000 paper plates, margin and price-cost differential in percent.

Period	US price	US quantity	China price	China quantity	China margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

Note: Product 2: 8.375” – 8.75” round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale.

Note: U.S. producer price data is the same as that presented in table V-5.

Figure V-6
Paper plates: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter

U.S. price and import purchase cost of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: 8.375”-9.0” round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Figure V-7
Paper plates: U.S. producer prices and import purchase costs, and quantities, of product 2, by quarter

U.S. price and import purchase cost of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: 8.375” – 8.75” round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale.

Price and purchase cost trends

In general, prices increased during January 2020-September 2023. Table V-10 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent during January 2020-September 2023 while no imports had trends for pricing products or purchase cost products over that period.

Table V-10
Paper plates: Summary of price and cost data, by product and source

Volume in 1,000 paper plates, price and cost in dollars per 1,000 paper plates

Product	Source	Number of quarters	Volume of shipments	Low price/ cost	High price/ cost	First quarter price/ cost	Last quarter price/ cost	Percent change in price/cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China price	***	***	***	***	***	***	***
Product 3	Thailand price	***	***	***	***	***	***	***
Product 3	Vietnam price	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	China price	***	***	***	***	***	***	***

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

Note: Percentage change from the first quarter in which data were available in 2020 to the last quarter in which data were available in 2023.

Price and purchase cost comparisons

Price comparisons

As shown in table V-11, prices for product imported from subject countries were below those for U.S.-produced product in 7 of 21 instances (*** paper plates); margins of underselling ranged from 0.1 to 15.9 percent. In the remaining 14 instances (*** paper plates), prices for product from subject countries were between 0.2 and 45.8 percent above prices for the domestic product. There were three instances of underselling and eight instances of overselling from China, two instances of underselling and three instances of overselling from Thailand, and two instances of underselling and three instances of overselling from Vietnam.

Table V-11
Paper plates: Instances of underselling and overselling and the range and average of margins, by product

Quantity in 1,000 paper plates; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	---	***	***	***	***
Product 2	Underselling	---	***	***	***	***
Product 3	Underselling	6	***	***	***	***
Product 4	Underselling	1	***	***	***	***
Total	Underselling	7	72,439	6.1	0.1	15.9
Product 1	Overselling	---	***	***	***	***
Product 2	Overselling	---	***	***	***	***
Product 3	Overselling	12	***	***	***	***
Product 4	Overselling	2	***	***	***	***
Total	Overselling	14	127,572	(8.7)	(0.2)	(45.8)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-12
Paper plates: Instances of underselling and overselling and the range and average of margins, by source

Quantity in 1,000 paper plates; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	3	***	***	***	***
Thailand	Underselling	2	***	***	***	***
Vietnam	Underselling	2	***	***	***	***
Total	Underselling	7	72,439	6.1	0.1	15.9
China	Overselling	8	***	***	***	***
Thailand	Overselling	3	***	***	***	***
Vietnam	Overselling	3	***	***	***	***
Total	Overselling	14	127,572	(8.7)	(0.2)	(45.8)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Price-cost comparisons

As shown in table V-13, landed duty-paid costs for paper plates imported from China were below the sales price for U.S.-produced product in 9 of 14 instances (*** paper plates); price-cost differentials ranged from 3.0 to 13.1 percent. In the remaining 5 instances

(*** paper plates), landed duty-paid costs for paper plates from China were between and 0.1 to 12.8 percent above sales prices for the domestic product.

Table V-13
Paper plates: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by product

Quantity in 1,000 paper plates; price-cost differential in percent

Product	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
Product 1	Lower than U.S. price	5	***	***	***	***
Product 2	Lower than U.S. price	4	***	***	***	***
Product 3	Lower than U.S. price	---	***	***	***	***
Product 4	Lower than U.S. price	---	***	***	***	***
Total	Lower than U.S. price	9	***	8.2	3.0	13.1
Product 1	Higher than U.S. price	---	***	***	***	***
Product 2	Higher than U.S. price	5	***	***	***	***
Product 3	Higher than U.S. price	---	***	***	***	***
Product 4	Higher than U.S. price	---	***	***	***	***
Total	Higher than U.S. price	5	***	(6.3)	(0.1)	(12.8)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-14
Paper plates: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by source

Quantity in 1,000 paper plates; price-cost differential in percent

Source	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
China	Lower than U.S. price	9	***	***	***	***
Thailand	Lower than U.S. price	---	***	***	***	***
Vietnam	Lower than U.S. price	---	***	***	***	***
Total	Lower than U.S. price	9	***	8.2	3.0	13.1
China	Higher than U.S. price	5	***	***	***	***
Thailand	Higher than U.S. price	---	***	***	***	***
Vietnam	Higher than U.S. price	---	***	***	***	***
Total	Higher than U.S. price	5	***	(6.3)	(0.1)	(12.8)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

At the conference, U.S. producers described large retail purchasers as often making purchasing decisions for their individual distribution centers, although they may also make purchasing decisions on specific products. U.S. producers described losing sales to subject imports when purchasers quote lower prices on prospective sales to particular distribution centers.[10]

The Commission requested that U.S. producers of paper plates report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of paper plates from subject countries since January 2020. Of the seven responding U.S. producers, six reported that they had to reduce prices, four reported that they had to roll back announced price increases, and six reported that they had lost sales.[11]

Six U.S. producers (***) submitted lost sales and lost revenue allegations. The 6 responding U.S. producers identified 17 firms with which they lost sales or revenue (1 consisting of lost sales allegations, 1 consisting of lost revenue allegations, and 15 consisting of both types of allegations). China was listed as a subject country in allegations involving 16 of the 17 purchasers, Vietnam was listed in allegations involving 3 purchasers, and Thailand was listed in allegations involving 1 purchaser. Timing of reported lost sales and revenues spanned the entire period of investigation. U.S. producers described some of the lost sales and revenues as annual bids with purchasers in which they lost volume to subject imports or had to reduce prices to retain the volume.

Staff contacted 17 purchasers and received responses from 8 purchasers. Responding purchasers reported purchasing 81.4 billion paper plates during January 2020-September 2023 (table V-15).

[10] Additionally, U.S. producers indicated that paper plates are not usually sold as parts of bundles with other products, although there are some such sales. Conference transcript, pp. 50-53 (Epstein, White, and Novak).

[11] ***.

Table V-15
Paper plates: Purchasers' reported purchases and imports, by firm and source

Quantity in 1,000 paper plates, share in percent

Firm	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject share
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

Of the eight responding purchasers, seven reported that, since 2020, they had purchased imported paper plates from subject countries instead of U.S.-produced product (seven from China, one from Thailand, and five from Vietnam). All seven of these purchasers reported that subject import prices were lower than prices for U.S.-produced product. None of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. One purchaser (***) estimated the quantity of paper plates from China purchased instead of domestic product (for what it described as non-price reasons); it reported a quantity of *** paper plates (tables V-16 and V-17).[12] Purchasers identified limited availability of domestic product, supplier diversification, and domestic producers' inability or unwillingness to produce certain specialty products as non-price reasons for purchasing imported rather than U.S.-produced product.

[12] The survey asks purchasers to report the quantity of subject imports purchased instead of domestic product when price was the primary reason. ***.

Table V-16
Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 paper plates

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued
Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 paper plates

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
All firms	Yes--7; No--1	Yes--7; No--0	Yes--0; No--7	***	NA

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

Table V-17
Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in 1,000 paper plates

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	7	7	---	***
Thailand	1	1	---	---
Vietnam	5	5	---	---
Any subject source	7	7	---	***

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

Of the eight responding purchasers, two reported that U.S. producers had reduced prices in order to compete with lower-priced imports from China (tables V-18 and V-19). The reported estimated price reduction ranged from 7 to 14 percent. None of the eight purchasers reported that U.S. producers had reduced prices to compete with lower-priced imports from Vietnam and Thailand.

Table V-18
Paper plates: Purchasers' responses to U.S. producer price reductions, by firm

Firm	Reported producers lowered prices	Estimated percent of U.S. price reduction	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total / average	Yes--2; No--6	***	NA

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

Table V-19
Paper plates: Purchasers' responses to U.S. producer price reductions, by source

Source	Count of purchasers reporting U.S. producers reduced prices	Average percent of estimated U.S. price reduction	Range of percent of estimated U.S. price reductions
China	2	10.5	***
Thailand	---	---	***
Vietnam	---	---	***
Total / average	2	10.5	***

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

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. ***

***. ***. ***. ***. ***.

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different countries since January 1, 2020 (table V-20). The main reason reported by six purchasers for decreased purchases of U.S.-produced product and increased purchases of subject imports was limited supply of domestic product, including because domestic suppliers were on allocation of paperboard. In addition, *** reported increased purchases of paper plates with customized or special designs from China and Vietnam.

Table V-20
Paper plates: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily increased	Fluctuated up	No change	Fluctuated down	Steadily decreased	Did not purchase
United States	1	2	0	3	3	0
China	4	2	1	1	1	0
Thailand	0	1	0	0	0	7
Vietnam	3	3	0	0	0	2
All other sources	0	1	0	0	2	5
Sources unknown	0	0	0	0	1	6

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

Part VI: Financial experience of U.S. producers

Background[1]

Seven U.S. producers provided financial results on their paper plate operations. All U.S. producers reported financial data on a calendar-year basis and six of the responding U.S. producers provided their financial data on the basis of GAAP.[2]

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2022. As shown in the figure ***. Collectively, these four companies accounted for *** percent of total net sales volume in 2022.

[1] The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] ***. U.S. producers' questionnaire responses, sections III-2 A.1. and III-2 B.4.

Figure VI-1
Paper plates: U.S. producers' share of net sales quantity in 2022, by firm

* * * * * * *

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

Operations on paper plates

Table VI-1 presents aggregated data on U.S. producers' operations in relation to paper plates, while table VI-2 presents corresponding changes in AUVs. Table VI-3 presents selected company-specific financial data.

Table VI-1
Paper plates: U.S. producers' results of operations, by item and period

Quantity in 1,000 paper plates; value in 1,000 dollars; ratios in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Total net sales	Quantity	52,462,791	52,641,350	50,877,226	37,935,457	36,290,738
Total net sales	Value	2,051,965	2,252,714	2,662,857	1,930,238	2,056,103
COGS: Raw materials	Value	1,069,212	1,164,266	1,428,009	1,044,219	1,052,311
COGS: Direct labor	Value	174,378	188,901	242,157	173,565	189,387
COGS: Other factory	Value	387,896	397,418	399,071	288,747	399,511
COGS: Total	Value	1,631,486	1,750,585	2,069,237	1,506,531	1,641,209
Gross profit or (loss)	Value	420,479	502,129	593,620	423,707	414,894
SG&A expenses	Value	138,443	147,830	161,652	118,968	140,892
Operating income or (loss)	Value	282,036	354,299	431,968	304,739	274,002
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	55,667	63,920	69,692	50,917	59,509
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	52.1	51.7	53.6	54.1	51.2
COGS: Direct labor	Ratio to NS	8.5	8.4	9.1	9.0	9.2
COGS: Other factory	Ratio to NS	18.9	17.6	15.0	15.0	19.4
COGS: Total	Ratio to NS	79.5	77.7	77.7	78.0	79.8
Gross profit	Ratio to NS	20.5	22.3	22.3	22.0	20.2
SG&A expense	Ratio to NS	6.7	6.6	6.1	6.2	6.9
Operating income or (loss)	Ratio to NS	13.7	15.7	16.2	15.8	13.3
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table VI-1 Continued
Paper plates: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per 1,000 paper plates; count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
COGS: Raw materials	Share of COGS	65.5	66.5	69.0	69.3	64.1
COGS: Direct labor	Share of COGS	10.7	10.8	11.7	11.5	11.5
COGS: Other factory	Share of COGS	23.8	22.7	19.3	19.2	24.3
COGS: Total	Share of COGS	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	39.11	42.79	52.34	50.88	56.66
COGS: Raw materials	Unit value	20.38	22.12	28.07	27.53	29.00
COGS: Direct labor	Unit value	3.32	3.59	4.76	4.58	5.22
COGS: Other factory	Unit value	7.39	7.55	7.84	7.61	11.01
COGS: Total	Unit value	31.10	33.25	40.67	39.71	45.22
Gross profit or (loss)	Unit value	8.01	9.54	11.67	11.17	11.43
SG&A expenses	Unit value	2.64	2.81	3.18	3.14	3.88
Operating income or (loss)	Unit value	5.38	6.73	8.49	8.03	7.55
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	7	7	7	7	7

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

Table VI-2
Paper plates: Changes in AUVs between comparison periods

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Sep 2022-23
Total net sales	▲33.8	▲9.4	▲22.3	▲11.3
COGS: Raw materials	▲37.7	▲8.5	▲26.9	▲5.3
COGS: Direct labor	▲43.2	▲8.0	▲32.6	▲14.1
COGS: Other factory	▲6.1	▲2.1	▲3.9	▲44.6
COGS: Total	▲30.8	▲6.9	▲22.3	▲13.9

Table continued.

Table VI-2 Continued
Paper plates: Changes in AUVs between comparison periods

Changes in dollars per 1,000 paper plates

Item	2020-22	2020-21	2021-22	Jan-Sep 2022-23
Total net sales	▲13.23	▲3.68	▲9.55	▲5.77
COGS: Raw materials	▲7.69	▲1.74	▲5.95	▲1.47
COGS: Direct labor	▲1.44	▲0.26	▲1.17	▲0.64
COGS: Other factory	▲0.45	▲0.16	▲0.29	▲3.40
COGS: Total	▲9.57	▲2.16	▲7.42	▲5.51
Gross profit or (loss)	▲3.65	▲1.52	▲2.13	▲0.26
SG&A expense	▲0.54	▲0.17	▲0.37	▲0.75
Operating income or (loss)	▲3.11	▲1.35	▲1.76	▼(0.48)
Net income or (loss)	▲***	▲***	▲***	▼***

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

Table VI-3
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	52,462,791	52,641,350	50,877,226	37,935,457	36,290,738

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	2,051,965	2,252,714	2,662,857	1,930,238	2,056,103

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	1,631,486	1,750,585	2,069,237	1,506,531	1,641,209

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	420,479	502,129	593,620	423,707	414,894

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	138,443	147,830	161,652	118,968	140,892

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	282,036	354,299	431,968	304,739	274,002

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	79.5	77.7	77.7	78.0	79.8

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	20.5	22.3	22.3	22.0	20.2

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	6.7	6.6	6.1	6.2	6.9

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	13.7	15.7	16.2	15.8	13.3

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	39.11	42.79	52.34	50.88	56.66

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	20.38	22.12	28.07	27.53	29.00

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	3.32	3.59	4.76	4.58	5.22

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	7.39	7.55	7.84	7.61	11.01

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	31.10	33.25	40.67	39.71	45.22

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	8.01	9.54	11.67	11.17	11.43

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	2.64	2.81	3.18	3.14	3.88

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	5.38	6.73	8.49	8.03	7.55

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per 1,000 paper plates

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

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

Net sales

The industry's net sales quantity increased from 52.5 billion paper plates in 2020 to 52.6 billion paper plates in 2021 and then decreased to 50.9 billion paper plates in 2022, for an overall decrease between 2020 and 2022. The industry's sales volume was also lower in interim 2023 (36.3 billion paper plates) than during the same period in 2022 (37.9 billion paper plates). On a value basis, net sales increased from $2.1 billion in 2020 to $2.7 billion in 2022 and were higher in interim 2023 ($2.1 billion) than in January-March 2022 ($1.9 billion). As shown in table VI-3, five of the seven responding producers reported an overall decrease in their net sales volume between 2020 and 2022 and six reported a lower sales volume in interim 2023 than in interim 2022.[3] All of the responding U.S. producers reported an overall increase in net sales revenue between 2020 and 2022 and five reported higher net sales revenue in interim 2023 than in interim 2022.

The industry's net sales AUV increased from $39.11 per 1,000 paper plates in 2020 to $52.34 per 1,000 paper plates in 2022 and was higher in interim 2023, at $56.66 per 1,000 paper plates, than in interim 2022, at $50.88 per 1,000 paper plates. All U.S. producers reported an overall increase in their net sales AUVs between 2020 and 2022 and higher net sales AUVs in interim 2023 than in interim 2022.[4]

There was a relatively wide range of net sales AUVs among the U.S. producers, with *** having the lowest sales AUV in 2022, at $*** per 1,000 paper plates, and *** having the highest, at $*** per 1,000 paper plates. In general, ***, and had the *** company-specific sales AUVs in each year and partial-year period. The majority of these producers' 2022 U.S. shipments were for private label brands.[5] Hoffmaster and Unique Industries produce paper plates that are considered highly-decorated party or occasion plates and had the ***.[6] Lastly,

[3] ***.

[4] While all U.S. producers reported an increase in their net sales AUVs between 2020 and 2022, ***.

[5] U.S. producers' questionnaire responses, section II-11.

[6] Conference transcript, pp. 29-30 (White) and petitioners' postconference brief, exh. 1, pp. A-15-16.

***.[7] At the staff conference, witnesses testified that Georgia-Pacific's Dixie branded paper plates received a 20 to 25 percent price premium over other paper plates.[8]

Cost of goods sold and gross profit or loss

Raw material costs, direct labor, and other factory costs accounted for 69.0, 11.7, and 19.3 percent of total COGS, respectively, in 2022. Each of these three components of COGS increased from 2020 to 2022 and were higher in interim 2023 than in interim 2022. As is shown in table VI-2, between 2020 and 2022, raw material costs increased by $7.69 per 1,000 paper plates, direct labor increased by $1.44 per 1,000 paper plates, and other factory costs increased by $0.45 per 1,000 paper plates. Between the comparable interim periods, raw material costs increased by $1.47 per 1,000 paper plates, direct labor increased by $0.64 per 1,000 paper plates, and other factory costs increased by $3.40 per 1,000 paper plates.[9]

Table VI-4 presents raw materials, by type.[10] The table shows that paperboard is the primary raw material input for paper plates and accounted for 78.2 percent of the cost of raw

[7] *** U.S. producer questionnaire responses, section II-11.

[8] Conference transcript, pp. 64-65 (Epstein) and pp. 78-79 (Cappell). ***.

[9] While six of the seven firms reported a higher other factory cost AUV in interim 2023 compared with interim 2022, ***. Email from ***. Staff notes that ***.

[10] ***. ***'s U.S. producers' questionnaire response, section III-6.

materials in 2022. All of the U.S. producers also reported using other raw material inputs which were described as ***.[11]

Table VI-4
Paper plates: U.S. producers' raw material costs in 2022

Value in 1,000 dollars; unit values in dollars per 1,000 paper plates; share of value in percent

Item	Value	Unit value	Share of value
Paperboard	***	***	***
Other material inputs	***	***	***
Total, raw materials	1,428,009	28.07	100.0

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

Total COGS increased from 2020 to 2022 and was higher in interim 2023 than in interim 2022. The industry's COGS AUV increased from $31.10 per 1,000 paper plates in 2020 to $40.67 per 1,000 paper plates in 2022 and was higher in interim 2023 (at $45.22 per 1,000 paper plates) than in interim 2022 (at $39.71 per 1,000 paper plates).[12] The COGS to net sales ratio decreased from 79.5 percent in 2020 to 77.7 percent in 2022, as net sales values increased at a faster rate than COGS. The COGS to net sales ratio was higher in interim 2023 (at 79.8 percent) than in interim 2022 (at 78.0 percent) as the increase in COGS outpaced the increase in net sales values.

Between 2020 and 2022, net sales revenue increased more than COGS resulting in gross profit increasing from $420.5 million in 2020 to $593.6 million in 2022. However, gross profit was lower in interim 2023 ($414.9 million) than it was in interim 2022 ($423.7 million) due to total COGS increasing more than net sales revenue between the comparable interim periods.[13] The industry's gross profit margin increased from 20.5 percent in 2020 to 22.3 percent in 2022, but was lower in interim 2023, at 20.2 percent, than it was in interim 2022, at 22.0 percent.[14] [15]

[11] U.S. producers' questionnaire responses, section III-9c.

[12] Increases in raw material costs accounted for the majority of the industry's increases in COGS AUVs.

[13] ***.

[14] There was a relatively wide range of gross profit margins among the U.S. producers. In 2022, they ranged from ***.

[15] ***.

SG&A expenses and operating income or loss

The industry's SG&A expenses increased between 2020 and 2022, from $138.4 million to $161.7 million, and were higher in January-March 2023, at $140.9 million, than they were in interim 2022, at $119.0 million. The industry's SG&A expense ratio (the ratio of SG&A expenses to net sales value) decreased between 2020 and 2022, from 6.7 to 6.1 percent, but was higher in interim 2023, at 6.9 percent, than in interim 2022, at 6.2 percent.[16] [17]

The industry's operating income increased from $282.0 million in 2020 to $432.0 million in 2022 but was lower in January-March 2023, at $274.0 million, than during the same period in 2022, when it was $304.7 million. Six of the seven firms reported an increase in operating income (***) from 2020 to 2022. *** reported a higher operating income (***) in interim 2023. The operating income margin increased from 13.7 percent in 2020 to 16.2 percent in 2022 but was lower in interim 2023, at 13.3 percent, than in interim 2022, at 15.8 percent.[18]

[16] ***. Email from ***. ***. Email from ***.

[17] ***. Email from ***.

[18] ***.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income, which are usually allocated to the product line from high levels in the corporation. Interest expense, which was the largest of these line items in each period examined, increased irregularly from $*** in 2020 to $*** in 2022 and was higher in interim 2023, at $***, than in interim 2022, at $***.[19] All other expenses increased from $*** in 2020 to $*** in 2022 and were lower in interim 2023 ($***) than in interim 2033 ($***).[20] All other income increased from $*** in 2020 to $*** in 2022 and was higher in interim 2023, at $***, than in interim 2022, at $***.

The industry's net income increased from $*** in 2020 to $*** in 2022 but was lower in interim 2023, at $***, than in interim 2022, when it was $***.[21] [22]

[19] ***. Email from ***.

[20] ***. Email from ***.

[21] ***.

[22] A variance analysis is not shown due to the large variety of product mixes and cost structures among the reporting firms.

Capital expenditures and research and development expenses

Table VI-5 presents capital expenditures, by firm, and table VI-7 presents R&D expenses, by firm. Tables VI-6 and VI-8 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

The industry's capital expenditures decreased from $*** in 2020 to $*** in 2022 but were *** higher in interim 2023 when compared with interim 2022. ***.[23]

The industry's R&D expenses decreased between 2020 and 2022, from $*** to $***, and was *** higher in interim 2023 ($***) than in interim 2022 ($***). ***.

Table VI-5
Paper plates: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

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

[23] As shown in table VI-6, ***. ***. ***'s U.S. producer questionnaire response, section II-2a.

Table VI-6
Paper plates: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
AJM Packaging	***
Aspen Products	***
Dart Container	***
Georgia-Pacific	***
Hoffmaster	***
Huhtamaki Americas	***
Unique Industries	***

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

Table VI-7
Paper plates: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

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

Table VI-8
Paper plates: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
AJM Packaging	***
Aspen Products	***
Dart Container	***
Georgia-Pacific	***
Hoffmaster	***
Huhtamaki Americas	***
Unique Industries	***

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

Assets and return on assets

Table VI-9 presents data on the U.S. producers' total assets for paper plates while table VI-10 presents their operating ROA.[24] Table VI-11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets increased from $599.5 million in 2020 to $886.8 million in 2022. While all of the U.S. producers reported an increase in their total assets, ***. The industry's ROA increased irregularly from 47.0 percent in 2020 to 48.7 percent in 2022.

Table VI-9
Paper plates: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022
AJM Packaging	***	***	***
Aspen Products	***	***	***
Dart Container	***	***	***
Georgia-Pacific	***	***	***
Hoffmaster	***	***	***
Huhtamaki Americas	***	***	***
Unique Industries	***	***	***
All firms	599,492	715,096	886,792

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

[24] The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table VI-10
Paper plates: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2020	2021	2022
AJM Packaging	***	***	***
Aspen Products	***	***	***
Dart Container	***	***	***
Georgia-Pacific	***	***	***
Hoffmaster	***	***	***
Huhtamaki Americas	***	***	***
Unique Industries	***	***	***
All firms	47.0	49.5	48.7

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

Table VI-11
Paper plates: U.S. producers' narrative descriptions of their total net assets or changes in their total assets, by firm

Firm	Narrative on assets
AJM Packaging	***
Aspen Products	***
Dart Container	***
Georgia-Pacific	***
Hoffmaster	***
Huhtamaki Americas	***
Unique Industries	***

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

Capital and investment

The Commission requested U.S. producers of paper plates to describe any actual or potential negative effects of imports of paper plates from China, Thailand, and Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-12 presents the number of firms reporting an impact in each category and table VI-13 provides the U.S. producers' narrative responses.

Table VI-12
Paper plates: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2020, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

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

Note: ***.

Table VI-13
Paper plates: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020, by firm and effect

Item	Firm name and narrative on impact of imports
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table VI-13 Continued
Paper plates: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020, by firm and effect

Item	Firm name and narrative on impact of imports
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Part VII: Threat considerations and information on nonsubject countries

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

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

Subject countries

The Commission issued foreign producer/exporter questionnaires to 125 firms for which valid contact information was obtained that are believed to produce and/or paper plates from China, Thailand, and Vietnam.[3] Usable responses to the Commission's questionnaire were received from 3 firms in total:

- zero firms in China;
- one firm in Thailand; and
- two firms in Vietnam.

These firms' exports to the United States accounted for the following shares of U.S. imports of paper plates by source in 2022:[4]

- China, 0 percent;
- Thailand, *** percent; and
- Vietnam, *** percent.

According to estimates requested of the responding subject producers, the production of paper plates reported in questionnaire responses accounted for the following shares of overall production of paper plates by individual subject country in 2022:[5]

- China, 0 percent;
- Thailand, *** percent[6]; and
- Vietnam, *** percent.

[3] These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

[4] These shares reflect a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire with official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4823.69.0040, accessed February 7, 2024, adjusted to remove out-of-scope imports under the HTS statistical reporting numbers reported in Commission questionnaires and from certified "No" importers using proprietary, Census-edited Customs records as well as using Commission questionnaires. Imports are based on the imports for consumption data series.

[5] Firms were asked in the Commission's foreign producer/exporter questionnaire to estimate the share of their country's production of paper plates that their firm accounted for. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm's share of the total requested.

[6] *** of its share of production of paper plates in Thailand during 2022.

Table VII-1 presents information on the paper plate operations of the responding subject producers/exporters of paper plates during 2022.

Table VII-1
Paper plates: Summary data for subject producers, 2022

Firm	Pro-duction (1,000 paper plates)	Share of reported pro-duction (percent)	Exports to the United States (1,000 paper plates)	Share of reported exports to the United States (percent)	Total shipments (1,000 paper plates)	Share of firm's total shipments exported to the United States (percent)
All reporting foreign producers from China	***	***	***	***	***	***
Thai Paper (Thailand)	***	***	***	***	***	***
All reporting foreign producers from Thailand	***	***	***	***	***	***
Go-Pak Paper Products (Vietnam)	***	***	***	***	***	***
Xie Li Viet Nam (Vietnam)	***	***	***	***	***	***
All reporting foreign producers from Vietnam	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

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

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of paper plates since January 1, 2020. All of the responding subject producers indicated in their questionnaires that they had experienced such changes. Table VII-2 and VII-3 present the changes identified by these subject producers.

Table VII-2
Paper plates: Count of reported changes in operations since January 1, 2020, by subject foreign producing country and type of change in operation

Count in number of firms reporting

Item	China	Thailand	Vietnam	Subject producers
Plant openings	0	1	0	1
Plant closings	0	0	0	0
Prolonged shutdowns	0	0	0	0
Production curtailments	0	0	0	0
Relocations	0	0	0	0
Expansions	0	0	1	1
Acquisitions	0	0	1	1
Consolidations	0	0	0	0
Weather-related or force majeure events	0	0	1	1
Other	0	0	0	0
Any change	0	1	2	3

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

Table VII-3
Paper plates: Subject producers' reported changes in operations since January 1, 2020, by firm

Item	Firm name and accompanying narrative response
Plant openings	***
Expansions	***
Acquisitions	***
Weather-related or force majeure events	***

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

Operations on paper plates

Table VII-4 presents data on subject producers' installed capacity, practical overall capacity, and practical paper plates capacity and production on the same equipment. Between 2020 and 2022, installed overall, installed practical, and practical paper plates capacity increased. Practical overall, installed overall, and practical paper plates capacity increased during interim 2023 compared to interim 2022. Following a similar trend, practical overall, installed overall, and practical paper platers production all increased during 2020-22, and were all higher during interim 2023 compared to interim 2022.

Table VII-4
Paper plates: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 paper plates; utilization in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper plates	Capacity	***	***	***	***	***
Practical paper plates	Production	***	***	***	***	***
Practical paper plates	Utilization	***	***	***	***	***

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

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

Table VII-5 presents subject producers' reported capacity constraints since January 1, 2020. The most commonly reported capacity constraint was storage capacity (reported by two firms).

Table VII-5
Paper plates: Subject producers' reported capacity constraints since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Fuel or energy	***
Storage capacity	***
Storage capacity	***
Logistics/transportation	***

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

Table VII-6 presents information on the paper plates operations of the responding subject producers/exporters. Between 2020 and 2022, subject producers' combined capacity and production of paper plates increased ***. Subject producers' capacity utilization decreased slightly (*** percentage points) during 2020-22. Subject producers' capacity and production was higher during interim 2023 than during 2022.

Subject producers' exports to the United States, which accounted for the *** shipments, increased overall *** during 2020-22. The leading exporter of paper plates to the United States was ***. Subject producers' exports to the United States were higher during interim 2023 than during interim 2022.

Exports to the United States *** as a share of subject producers' total shipments.

Table VII-6
Paper plates: Data on subject industries, by period

Quantity in 1,000 paper plates

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-6 Continued
Paper plates: Data on subject industries, by period

Share and ratio in percent

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	***	***	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Adjusted share of total shipments accounts for exports to the U.S. exported by resellers in total shipments.

Table VII-7 presents information on the paper plates operations of the responding producers/exporters by subject country.

From 2020 to 2022, Thai producers' capacity and production increased overall ***. Capacity utilization was lower during interim 2023 than during interim 2022. Thai producers' capacity and production are projected to be higher in 2023 and 2024 than 2022 levels.

From 2020 to 2022, Vietnamese producers' capacity and production increased overall, and were higher during interim 2023 than during interim 2022. Capacity utilization increased during 2020-22, and was higher during interim 2023 than during interim 2022. Vietnamese producers' capacity and production are projected to be higher in 2023 and 2024 than 2022 levels.

Table VII-7
Paper plates: Subject producers' output, by source and period

Practical capacity

Capacity in 1,000 paper plates

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	4,000,000	6,628,862	7,533,041	7,376,380	9,694,620	9,673,920	10,573,920

Table continued.

Table VII-7 Continued
Paper plates: Subject producers' output, by source and period

Production

Production in 1,000 paper plates

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	3,800,000	6,268,454	7,146,405	7,043,502	9,064,817	9,175,912	10,043,274

Table continued.

Table VII-7 Continued
Paper plates: Subject producers' output, by source and period

Capacity utilization

Capacity utilization in percent

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	95.0	94.6	94.9	95.5	93.5	92.4	92.8

Table continued.

Table VII-7 Continued
Paper plates: Subject producers' output, by source and period

Share of production

Share in percent

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

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

Alternative products

Table VII-8 presents subject producers' overall production on the same equipment and machinery used to produce paper plates. Paper plates accounted for the plurality of (*** to *** percent) of subject producers' overall production. All responding producers/exporters reported the production of other products such as liquid fiber paper plates and other products during 2020-22, and during the interim periods. ***. ***.

Table VII-8
Paper plates: Subject producers' overall production on the same equipment as in-scope production, by period

Quantity in 1,000 paper plates; share in percent

Product type	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Paper plates	Quantity	***	***	***	***	***
Liquid fiber paper plates	Quantity	***	***	***	***	***
Other paper dishes	Quantity	***	***	***	***	***
Other liquid fiber dishes	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper plates	Share	***	***	***	***	***
Liquid fiber paper plates	Share	***	***	***	***	***
Other paper dishes	Share	***	***	***	***	***
Other liquid fiber dishes	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

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

Exports

Table VII-9 presents Global Trade Atlas ("GTA") data for exports of paper or paperboard trays, dishes, plates, cups, and the like from subject countries to the United States and to all destination markets. The United States was the primary destination for exports of these paper or paperboard products from the subject countries. In terms of quantity and value, exports from each subject country to the United States were higher in 2022 than in 2020. Collectively, exports from combined subject countries to the United States increased and nearly doubled over this period. The largest increases during 2020-22 were from China and Vietnam, whose exports of paper and paperboard products to the United States both increased based on quantity and value, respectively.

Table VII-9
Paper or paperboard trays, dishes, cups, and the like: Exports from subject countries, by exporting country, destination market, and period

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

Exporting country	Measure	Destination market	2020	2021	2022
China	Quantity	United States	295,474	341,697	543,223
Thailand	Quantity	United States	1,320	411	8,838
Vietnam	Quantity	United States	4,169	6,895	13,335
Subject exporters	Quantity	United States	300,963	349,002	565,396
China	Quantity	All destination markets	956,910	1,140,823	1,545,892
Thailand	Quantity	All destination markets	4,478	3,082	12,477
Vietnam	Quantity	All destination markets	18,760	24,129	34,092
Subject exporters	Quantity	All destination markets	980,147	1,168,034	1,592,461
China	Share of quantity	United States	30.9	30.0	35.1
Thailand	Share of quantity	United States	29.5	13.3	70.8
Vietnam	Share of quantity	United States	22.2	28.6	39.1
Subject exporters	Share of quantity	United States	30.7	29.9	35.5
China	Value	United States	342,727	423,549	697,887
Thailand	Value	United States	1,309	477	7,431
Vietnam	Value	United States	8,370	11,832	24,283
Subject exporters	Value	United States	352,406	435,858	729,601
China	Value	All destination markets	1,226,386	1,593,149	2,242,585
Thailand	Value	All destination markets	6,532	5,098	13,439
Vietnam	Value	All destination markets	37,661	41,408	62,084
Subject exporters	Value	All destination markets	1,270,578	1,639,654	2,318,108
China	Share of value	United States	27.9	26.6	31.1
Thailand	Share of value	United States	20.0	9.4	55.3
Vietnam	Share of value	United States	22.2	28.6	39.1
Subject exporters	Share of value	United States	27.7	26.6	31.5

Source: Official exports statistics under HS subheading 4823.69 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed February 7, 2024.

Note: Shares represent the shares of value exported to the United States out of all destination markets. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". These data are overstated as the HS subheading contains products outside the scope of this investigation. Reported quantities are in 1,000 pounds, not 1,000 paper plates like the rest of the report quantities.

U.S. inventories of imported merchandise

Table VII-10 presents data on U.S. importers' reported inventories of paper plates. U.S. importers' inventories of imports from subject sources increased by *** percent during 2020-22, and were higher by *** percent during interim 2023 compared to interim 2022.[7] U.S. importers' inventories of imports from nonsubject sources increased during 2020-22, and were higher during interim 2023 compared to interim 2022.

[7] ***.

Table VII-10
Paper plates: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 paper plates; ratio in percent

Measure	Source	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Thailand	***	***	***	***	***
Ratio to imports	Thailand	***	***	***	***	***
Ratio to U.S. shipments of imports	Thailand	***	***	***	***	***
Ratio to total shipments of imports	Thailand	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of paper plates after September 30, 2023. Their reported data is presented in table VII-11. Subject sources accounted for *** of U.S. importers' arranged imports of paper plates. The leading individual sources of U.S. importers' total arranged imports was China, which accounted for *** of arranged imports of paper plates.

Table VII-11
Paper plates: U.S. importers' arranged imports, by source and period

Quantity in 1,000 of plates

Source	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Jul-Sept 2024	Total
China	***	***	***	***	***
Thailand	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

Based on available information, paper plates from China, Thailand, and Vietnam have not been subject to any other import relief proceedings outside the United States.

Information on nonsubject countries

Table VII-12 presents global export data for paper or paperboard trays, dishes, plates, cups, and the like, a category that includes paper plates and out-of-scope products. The largest global exporter was China, representing 50.6 percent of global exports by value in 2022, with exports of $2,242,585. The next five leading exporters by value in 2022 were Italy, the United States, Germany, Turkey, and Taiwan.

Table VII-12
Paper or paperboard trays, dishes, plates, cups, and the like: Global exports, by reporting country and period

Value in 1,000 dollars

Exporting country	Measure	2020	2021	2022
United States	Value	192,104	211,632	268,704
China	Value	1,226,386	1,593,149	2,242,585
Thailand	Value	6,532	5,098	13,439
Vietnam	Value	37,661	41,408	62,084
Subject exporters	Value	1,270,578	1,639,654	2,318,108
Italy	Value	227,010	286,421	317,005
Germany	Value	84,484	112,734	143,492
Turkey	Value	48,841	105,009	131,755
Taiwan	Value	97,299	104,467	124,410
Poland	Value	59,661	75,665	105,996
Spain	Value	60,284	79,566	105,342
Netherlands	Value	42,320	68,532	95,226
India	Value	12,223	38,848	63,528
Canada	Value	43,173	43,656	55,596
Finland	Value	37,497	39,234	54,809
All other exporters	Value	600,733	760021	920,047
All reporting exporters	Value	2,584,103	3,353,808	4,435,315

Table continued.

Table VII-12 Continued
Paper or paperboard trays, dishes, plates, cups, and the like: Global exports, by reporting country and period

Shares in percent

Exporting country	Measure	2020	2021	2022
United States	Share of value	7.4	6.3	6.1
China	Share of value	47.5	47.5	50.6
Thailand	Share of value	0.3	0.2	0.3
Vietnam	Share of value	1.5	1.2	1.4
Subject exporters	Share of value	49.2	48.9	52.3
Italy	Share of value	8.8	8.5	7.1
Germany	Share of value	3.3	3.4	3.2
Turkey	Share of value	1.9	3.1	3
Taiwan	Share of value	3.8	3.1	2.8
Poland	Share of value	2.3	2.3	2.4
Spain	Share of value	2.3	2.4	2.4
Netherlands	Share of value	1.6	2.0	2.1
India	Share of value	0.5	1.2	1.4
Canada	Share of value	1.7	1.3	1.3
Finland	Share of value	1.5	1.2	1.2
All other exporters	Share of value	23.2	22.7	20.7
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4823.69 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed March 4, 2024.

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
89 FR 6130, January 31, 2024	*Paper Plates From China, Thailand, and Vietnam; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-01-31/pdf/2024-01881.pdf
89 FR 13043, February 21, 2024	*Certain Paper Plates From the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-02-21/pdf/2024-03527.pdf
89 FR 14046, February 26, 2024	*Certain Paper Plates From the People's Republic of China, Thailand, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-02-26/pdf/2024-03863.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared in the United States International Trade Commission's Preliminary Conference:

Subject: Paper Plates from China, Thailand, and Vietnam

Inv. Nos.: 701-TA-704-706 and 731-TA-1664-1666 (Preliminary)

Date and Time: February 15, 2024 - 9:45 a.m.

Sessions were held in connection with these preliminary phase investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**Benjamin J. Bay**, The Bristol Group PLLC)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

The Bristol Group PLLC
Washington, DC
on behalf of

American Paper Plate Coalition ("APPC")

Robert Epstein, President and Chief Executive Officer, AJM Packaging Corporation

William P. Biggins, Jr., President and Co-Owner, Aspen Products, Inc.

Craig Cappell, President and Chief Executive Officer, Hoffmaster Group, Inc.

Aaron T. Holt, Vice President – Chief Financial Officer, Secretary & Treasurer, Hoffmaster Group, Inc.

Vince Daniel, Sr Vice President Product Management and Commercialization, Huhtamaki Americas, Inc.

Jason Hofmeyer, Senior Product Manager Folding Carton & Pressboard, Huhtamaki Americas, Inc.

Craig Novak, President and Chief Executive Officer, Unique Industries, Inc.

In Support of the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Thomas McDonough, Executive Vice President Operations, Unique Industries Inc.

Colleen White, Director of Channel, Hoffmaster Group, Inc.

Adam H. Gordon)
Jennifer M. Smith-Veluz) – OF COUNSEL
Benjamin J. Bay)

CLOSING REMARKS:

In Support of Imposition (**Adam H. Gordon**, The Bristol Group PLLC)

APPENDIX C

SUMMARY DATA

Table C-1
Paper plates: Summary data concerning the U.S. market, by item and period
Quantity=1,000 plates; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 plates; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
Item	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount	52,572,702	53,231,941	53,278,194	39,749,932	38,248,661	▲1.3	▲1.3	▲0.1	▼(3.8)
Producers' share (fn1)	99.5	98.6	95.1	95.1	94.5	▼(4.3)	▼(0.9)	▼(3.4)	▼(0.6)
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Thailand	***	***	***	***	***	▲***	▼***	▲***	▲***
Vietnam	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources	0.5	1.4	4.9	4.9	5.5	▲4.3	▲0.9	▲3.4	▲0.6
U.S. consumption value:									
Amount	2,074,065	2,303,256	2,772,568	2,013,841	2,141,963	▲33.7	▲11.1	▲20.4	▲6.4
Producers' share (fn1)	98.6	97.4	95.6	95.5	95.6	▼(2.9)	▼(1.1)	▼(1.8)	▲0.1
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▼***
Thailand	***	***	***	***	***	▲***	▼***	▲***	▲***
Vietnam	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources	1.4	2.6	4.4	4.5	4.4	▲2.9	▲1.1	▲1.8	▼(0.1)
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Thailand:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	***	▲***	▲***
Vietnam:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity	287,545	771,119	2,586,931	1,938,133	2,097,430	▲799.7	▲168.2	▲235.5	▲8.2
Value	29,253	58,740	120,791	90,612	94,259	▲312.9	▲100.8	▲105.6	▲4.0
Unit value	$101.74	$76.18	$46.69	$46.75	$44.94	▼(54.1)	▼(25.1)	▼(38.7)	▼(3.9)
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***

Table continued

Table C-1 Continued
Paper plates: Summary data concerning the U.S. market, by item and period
Quantity=1,000 plates; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 plates; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Sep		Comparison years			Jan-Sep
Item	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. producers':									
Practical capacity quantity	69,187,594	72,881,262	77,034,499	56,870,853	56,035,370	▲11.3	▲5.3	▲5.7	▼(1.5)
Production quantity	52,047,167	52,654,637	53,095,143	39,875,376	35,413,584	▲2.0	▲1.2	▲0.8	▼(11.2)
Capacity utilization (fn1)	75.2	72.2	68.9	70.1	63.2	▼(6.3)	▼(3.0)	▼(3.3)	▼(6.9)
U.S. shipments:									
Quantity	52,285,157	52,460,822	50,691,263	37,811,799	36,151,231	▼(3.0)	▲0.3	▼(3.4)	▼(4.4)
Value	2,044,812	2,244,516	2,651,777	1,923,229	2,047,704	▲29.7	▲9.8	▲18.1	▲6.5
Unit value	$39.11	$42.78	$52.31	$50.86	$56.64	▲33.8	▲9.4	▲22.3	▲11.4
Export shipments:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▼***	▲***	▼***
Production workers	***	***	***	***	***	▲***	▲***	▲***	▼***
Hours worked (1,000s)	***	***	***	***	***	▲***	▲***	▲***	▼***
Wages paid ($1,000)	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (plates per hour)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity	52,462,791	52,641,350	50,877,226	37,935,457	36,290,738	▼(3.0)	▲0.3	▼(3.4)	▼(4.3)
Value	2,051,965	2,252,714	2,662,857	1,930,238	2,056,103	▲29.8	▲9.8	▲18.2	▲6.5
Unit value	$39.11	$42.79	$52.34	$50.88	$56.66	▲33.8	▲9.4	▲22.3	▲11.3
Cost of goods sold (COGS)	1,631,486	1,750,585	2,069,237	1,506,531	1,641,209	▲26.8	▲7.3	▲18.2	▲8.9
Gross profit or (loss) (fn2)	420,479	502,129	593,620	423,707	414,894	▲41.2	▲19.4	▲18.2	▼(2.1)
SG&A expenses	138,443	147,830	161,652	118,968	140,892	▲16.8	▲6.8	▲9.3	▲18.4
Operating income or (loss) (fn2)	282,036	354,299	431,968	304,739	274,002	▲53.2	▲25.6	▲21.9	▼(10.1)
Net income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit COGS	$31.10	$33.25	$40.67	$39.71	$45.22	▲30.8	▲6.9	▲22.3	▲13.9
Unit SG&A expenses	$2.64	$2.81	$3.18	$3.14	$3.88	▲20.4	▲6.4	▲13.1	▲23.8
Unit operating income or (loss) (fn2)	$5.38	$6.73	$8.49	$8.03	$7.55	▲57.9	▲25.2	▲26.1	▼(6.0)
Unit net income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
COGS/sales (fn1)	79.5	77.7	77.7	78.0	79.8	▼(1.8)	▼(1.8)	▼(0.0)	▲1.8
Operating income or (loss)/sales (fn1)	13.7	15.7	16.2	15.8	13.3	▲2.5	▲2.0	▲0.5	▼(2.5)
Net income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Capital expenditures	***	***	***	***	***	▼***	▼***	▲***	▲***
Research and development expenses	***	***	***	***	***	▼***	▼***	▼***	▲***
Total assets	599,492	715,096	886,792	NA	NA	▲47.9	▲19.3	▲24.0	NA

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

DOMESTIC LIKE PRODUCT NARRATIVES

Table D-1
Paper plates: U.S. producer's narratives regarding the domestic like product factors comparing in-scope paper plates to out-of-scope liquid fiber paper plates

Factor	Producer name and narrative on the domestic like product factors
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***

Factor	Producer name and narrative on the domestic like product factors
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Producer name and narrative on the domestic like product factors
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***

Factor	Producer name and narrative on the domestic like product factors
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Producer name and narrative on the domestic like product factors
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Producer name and narrative on the domestic like product factors
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

Table D-2
Paper plates: U.S. importer's narratives regarding the domestic like product factors comparing in-scope paper plates to out-of-scope liquid fiber paper plates

Factor	Importer name and narrative on the domestic like product factors
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***

Factor	Importer name and narrative on the domestic like product factors
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Importer name and narrative on the domestic like product factors
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***

Factor	Importer name and narrative on the domestic like product factors
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Importer name and narrative on the domestic like product factors
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Importer name and narrative on the domestic like product factors
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

APPENDIX E

ALTERNATE U.S. IMPORTS

Table E-1
Paper plates: Alternate U.S. imports, by source and period

Quantity in 1,000 plates; value in 1,000 dollars; unit value in dollars per 1,000 plates

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
Thailand	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

Table E-1--continued
Paper plates: Alternate U.S. imports, by source and period

Shares in percent.

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
China	Share of quantity	***	***	***	***	***
Thailand	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	***	***	***	***	***
China	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 15, 2024, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports under the primary HTS number. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Data shown are official U.S. imports minus out-of-scope imports reported by firms.

Figure E-1
Paper plates: U.S. import quantities and average unit values, by source and period

* * * * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 15, 2024, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports under the primary HTS number. Imports are based on the imports for consumption data series.

Note: Data shown are official U.S. imports minus out-of-scope imports reported by firms.

Table E-2
Paper plates: Alternate U.S. imports in the twelve months preceding the filing of the petition, January 2023 through December 2023

Quantity in 1,000 pounds; Share of quantity in percent

Source of imports	Quantity	Share of quantity
China	***	***
Thailand	***	***
Vietnam	***	***
Subject sources	***	***
Nonsubject sources	***	***
All import sources	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed February 15, 2024, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports under the primary HTS number. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data shown are official U.S. imports minus out-of-scope imports reported by firms.