### FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

## ALUMINUM FOIL FROM ARMENIA, BRAZIL, OMAN, RUSSIA, AND TURKEY

This questionnaire must be received by the Commission by <u>July 16, 2021</u>

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning aluminum foil from Armenia, Brazil, Oman, Russia, and Turkey (Inv. Nos. 701-TA-658-659 and 731-TA-1538-1542 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII.

Name of firm			
Address			
Website			
NO (Sign the	d or exported aluminum foil (as defined e certification below and promptly return on ete all parts of the questionnaire, and return questionnaire relate to (Check one)	ly this page of the questionnath	aire to the Commission)
ARMENIA	BRAZIL OMAN	RUSSIA	TURKEY
edge and belief and unders of this certification I als	CERTIFICATIO Perein supplied in response to this qu Estand that the information submitted in For grant consent for the Commission,	estionnaire is complete is subject to audit and ver and its employees and	rification by the Commission. contract personnel, to use t
ation provided in this ques mmission on the same or si	tionnaire and throughout these procee imilar merchandise.	lings in any other import-	injury proceedings conducted
edings or other proceeding anel (a) for developing or r as, and evaluations relatir dix 3; or (ii) by U.S. govern	that information submitted in respons may be disclosed to and used: (i) by maintaining the records of this or a read to the programs, personnel, and ament employees and contract personnopriate nondisclosure agreements.	the Commission, its empl lated proceeding, or (b) ir operations of the Comm	loyees and Offices, and contro n internal investigations, audi ission including under 5 U.S
of Authorized Official	Title of Authorized Official	Date	

#### PART I.—GENERAL INFORMATION

<u>Background</u>. -- This proceeding was instituted in response to petitions filed on September 29, 2020, by the Aluminum Association Trade Enforcement Working Group, Arlington, Virginia and its individual members - Gränges Americas Inc., Franklin, Tennessee; JW Aluminum Company, Daniel Island, South Carolina; and Novelis Corporation, Atlanta, Georgia. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at LINK.

<u>Aluminum foil</u> -- The merchandise covered by these investigations is aluminum foil having a thickness of 0.2 mm or less, in reels exceeding 25 pounds, regardless of width. Aluminum foil is made from an aluminum alloy that contains more than 92 percent aluminum. Aluminum foil may be made to ASTM specification ASTM B479, but can also be made to other specifications. Regardless of specification, however, all aluminum foil meeting the scope description is included in the scope, including aluminum foil to which lubricant has been applied to one or both sides of the foil.

Excluded from the scope of these investigations is aluminum foil that is backed with paper, paperboard, plastics, or similar backing materials on one side or both sides of the aluminum foil, as well as etched capacitor foil and aluminum foil that is cut to shape. Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above. The products under investigation are currently imported under statistical reporting numbers 7607.11.3000, 7607.11.6090, 7607.11.9030, 7607.11.9060, 7607.11.9090, and 7607.19.6000 of the Harmonized Tariff Schedule of the United States (HTSUS).

Further, merchandise that falls within the scope of these proceedings may also be imported into the United States under HTSUS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3045, 7606.12.3055, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3095, 7606.91.6095, 7606.92.3035, and 7606.92.6095. The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Reporting of information</u>.--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, purchaser and/or foreign producer questionnaire), you need not respond to duplicated questions.

<u>Confidentiality</u>.--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. §1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

<u>Verification</u>.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

**Release of information**.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

<u>Valid number error messages.</u>—If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Celia Feldpausch (202-205-2387, celia.feldpausch@usitc.gov).

I-1. <u>OMB statistics</u>.--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 20 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please attach such comments to your response or send to the Office of Investigations, USITC, 500 E St. SW, Washington, DC 20436.

I-2. <u>Establishments covered</u>.--Provide the name and address of establishment(s) covered by this questionnaire.

" <u>Establishment</u> "Each facility of a firm in Armenia, Brazil, Oman, Russia, and Turkey involved in
the production or export of aluminum foil, including auxiliary facilities operated in conjunction
with (whether or not physically separate from) such facilities. Firms operating more than one
establishment in Armenia, Brazil, Oman, Russia, and Turkey should combine the data for all
establishments into a single report.

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I-3.		<u>Related producers</u> Does your firm or any related firm produce, have the capability to produce, or have any plans to produce aluminum foil in the United States or other countries?					
	No	Yes	1 -	the firm(s) and count that they complete t	• •		
I-4.			tersDoes your firm the United States?	or any related firm im	port or have any	plans to import	
	No	Yes	1 -	the firm(s) below and orter questionnaire.	d ensure that the	y complete the	
I-5. I-6.	I-4 are pu symbol (ir <b>External c</b>	blicly trad ncluding A ::ounsel.	led in the United Stat merican Depository I If your firm or paren	or any of the entities es, please specify the s Receipts, if applicable) t firm is represented b e of the law firm and th	stock exchange a : y external counse	nd trading	
	Law firm	:					
	Lead atto	orney(s):					
I-7.			•	es, contacts, telephon r firm's aluminum foil	· ·	e-mail addresses	
	Importer's na	ime	Contact person	Email	Telephone	Share of your firm's 2020 U.S. exports (%)	
1							
2							

### PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Celia Feldpausch (202-205-2387, celia.feldpausch@usitc.gov). **Supply all data requested on a <u>calendar-year</u> basis**.

II-1.	<u>Contact information</u> Please identify the responsible individual and the manner by which
	Commission staff may contact that individual regarding the confidential information submitted
	in part II.

Name	
Title	
Email	
Telephone	

II-2a. <u>Changes in operations.</u>--Please indicate whether your firm has experienced any of the following changes in relation to the production of aluminum foil since January 1, 2018.

(check as many as appropriate)		((If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely blank if not applicable))
	plant openings	
	plant closings	
	relocations	
	expansions	
	acquisitions	
	consolidations	
	prolonged shutdowns or production curtailments	
	revised labor agreements	
	other (e.g., technology)	

II-2b.	COVID-19 pandemic.—Since January 1, 2020, has the COVID-19 pandemic or have any
	government actions taken to contain the spread of the COVID-19 virus resulted in changes in
	relation to your firm's supply chain arrangements, production, and shipments (including exports
	to the United States) relating to aluminum foil?

No	Yes	If yes, describe these changes including a separate discussion of the (a) supply chain impact and (b) production and shipments (including exports to the United States) impact

II-2c. Anticipated changes in operations.--Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of aluminum foil in the future?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions.

II-3a. **Production using same machinery**.--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce aluminum foil, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated.

"Overall production capacity" or "capacity" –The level of production that your establishment(s) could reasonably have expected to attain during the specified periods for all products manufactured in that establishment using the same manufacturing equipment. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-8. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-8 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

"Production" -- All production in your establishment(s) in Armenia, Brazil, Oman, Russia, and Turkey, including production consumed internally within your firm.

# II-3a. **Production using same machinery**.--**Continued**.

		Quantity (i	n short tons)			
	Calendar year January-March					
	Item	2018	2019	2020	2020	2021
Overall prod	luction capacity <sup>1</sup>					
Production of						
Aluminum	n foil <sup>2</sup>	0	0	0	0	0
Alumin	ope production lum sheet, all alloys, ng can stock					
Alumin	um plate					
Other p	oroducts <sup>3</sup>					
	otal, out-of-scope uction	0	0	0	0	0
	tal production using me machinery or workers	0	0	0	0	0
II-3b. <u>O</u> I	perating parametersThe perating paramaters:	production cap	pacity reported	l in II-3a is ba	sed on the follo	wing
	Hours per week	We	eeks per year			
ca ho	apacity calculationPlease spacity reported in II-3a, and we your firm accounts for slouction capacity (e.g. ultr	d explain any c hifting from on	hanges in repo e product to a	orted capacity nother in cald	. In particular, popular, popular, p	olease explain orted
	roduction constraintsPlea roduction capacity.	ase describe th	e constraint(s)	that set the I	imit(s) on your	firm's

II-3e. <u>Production shifting between categories of aluminum foil.</u>—Is your firm able to produce the following aluminum foil category using the same equipment and labor as other aluminum foil products at your facility?

If you previously produced this category, but currently have no production, please indicate when you ceased producing it and why.

ltem	Able to produce using the same equipment?		If no longer producing, please indicate when production ceased and why:
	No	Yes	Explanation:
Ultra-thin – aluminum foil less than 0.000315 inch (8 microns) thickness.			
Thin – aluminum foil greater than or equal to 0.000315 inch (8 microns) and less than 0.00039 inch (10 microns) thickness.			
Standard – aluminum foil greater than or equal to 0.00039 inch (10 microns) and less than 0.001 inch (25 microns) thickness.			
Heavy – aluminum foil greater than or equal to 0.001 inch (25 microns) and less than 0.00177 inch (45 microns) thickness.			
Extra heavy – aluminum foil greater than or equal to 0.00177 inch (45 microns) thickness.			

II-3f. <u>Production for market segments</u>. Has your firm produced any of the products described below in the United States since 2018?

		oility to duce?	Actually produced any time since January 1, 2018		
Item	No	Yes	No	Yes	Explanation
Ultra-thin foil in widths exceeding 63 inches					
Ultra-thin foil, gauge 0.000236 to 0.000315					
Standard gauge for use in producing household foil, defined as foil fabricated from 8000 series alloy in gauges of 0.00039 to 0.0015 inches.					

	No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
	b	etween pr	ribe the factors that affect your firm's ability to shift production capacity oducts (e.g., time, cost, relative price change, etc.), and the degree to which is enhance or constrain such shifts.
5.			at percentage of your firm's total sales in its most recent fiscal year was s of aluminum foil? percent.
Sa.	estimate	the percen	are of production in Armenia, Brazil, Oman, Russia, and TurkeyPlease stage of total production of aluminum foil in the country specified on the ecounted for by your firm's production in 2020 percent.
ōb.	the Unite	d States of	are of country's exportsPlease estimate the percentage of total exports to aluminum foil from the country specified on the certification page ur firm's exports in 2020 percent.
		-	actionsIs the aluminum foil exported by your firm subject to ervailing duty/safeguard findings, remedies, or proceedings?
7.			
7.	No	Yes	If yesList the products(s), countries affected, and the date of such findings/remedies/proceedings.

II-8. <u>Trade data</u>.--Report your firm's production capacity, production, shipments, and inventories related to the production of aluminum foil in your establishment(s) in Armenia, Brazil, Oman, Russia, and Turkey during the specified periods. Do not include resales of aluminum foil that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-9.

<u>Do not submit data by manufacturing facility if they are in the same country.</u> If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response.

<u>Do not submit data on multiple countries combined</u>. The establishments reported here should all be located in the country of the firm's address reported on the certification page. Multinational companies with production in multiple subject countries should submit separate foreign producer questionnaire responses for each subject country.

"Average production capacity" or "capacity" –The level of production that your establishment(s) could reasonably have expected to attain during the specified periods for all products manufactured in that establishment using the same manufacturing equipment. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

"Production" -- All production in your establishment(s) in Armenia, Brazil, Oman, Russia, and Turkey, including production consumed internally within your firm.

"Shipments"--Shipments of products produced in your establishment(s) in Armenia, Brazil, Oman, Russia, and Turkey. Quantities reported should be net of returns.

"Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within Armenia, Brazil, Oman, Russia, and Turkey.

"Home market internal consumption/transfers to related firms"--Shipments made to related firms in Armenia, Brazil, Oman, Russia, and Turkey, including product consumed internally by your firm.

"Export shipments"--Shipments to destinations outside of the country indicated on page 1 (Armenia, Brazil, Oman, Russia, and Turkey), including shipments to related firms.

"Inventories"--Finished goods inventory, not raw materials or work-in-progress.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.

#### II-8. <u>Trade data</u>.--Continued.

	Qua	antity (in sh	ort tons)				
		Projections <sup>1</sup>					
	Ca	alendar yea	r	January-March		Calendar year	
Item	2018	2019	2020	2020	2021	2021	2022
Average production capacity <sup>2</sup> (A)							
Beginning-of-period inventories (B)							
Production (C)							
Home market shipments: Internal consumption/ transfers (D)							
Commercial shipments (E)							
Exports to the United States (F)							
Exports to all other markets <sup>3</sup> (G)							
Total exports (H) (should equal F+G)	0	0	0	0	0	0	0
Total shipments (I) (should equal D+E+F+G)	0	0	0	0	0	0	0
End-of-period inventories (J)							
<sup>1</sup> Please explain the basis for your f <sup>2</sup> The production capacity reported describe the methodology used to calc <sup>3</sup> Identify principal other export ma	is based on coulo	operating tion capacit	hours p				

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Actual experie		nce		Projections		
	C	alendar yea	r	Januar	y-March	Calend	dar year
Item	2018	2019	2020	2020	2021	2021	2022
B + C - D - E - F - G - J = should equal							
zero ("0") or provide an explanation.1	0	0	0	0	0	0	0

<sup>&</sup>lt;sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: \_\_\_\_\_.

II-9. Exports to the United States not produced by your firm.--Report your firm's exports to the United States of aluminum foil that was produced in Armenia, Brazil, Oman, Russia, and Turkey but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-8.

		Quantity (ii	n short tons	)			
		Act	ual experie	nce		Proje	ctions
	(	Calendar yea	ar	January	y-March	Calend	lar year
Item	2018	2019	2020	2020	2021	2021	2022
Exports of aluminum foil to the United States not produced by your firm <sup>1</sup>							
<sup>1</sup> List the producer(s)							

II-10.	Other explanationsIf your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

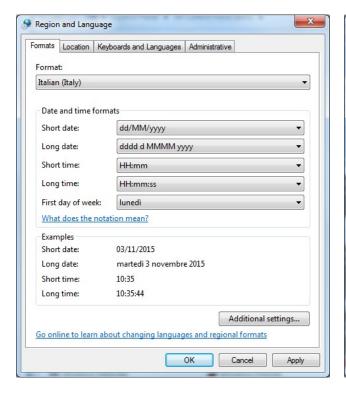
Correcting valid number error messages.—If you are completing a Commission questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. This issues stem from your computer number formatting setting (e.g., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (,) delineate multiples of 1000 and periods (.) delineate fractions less than one. Many EU countries use the reverse where multiples of 1000 are delineated with periods (.) and fractions less than one are delineated with commas (,). The U.S. International Trade Commission's questionnaires are setup in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU number formatting, we believe this may cause this issue.

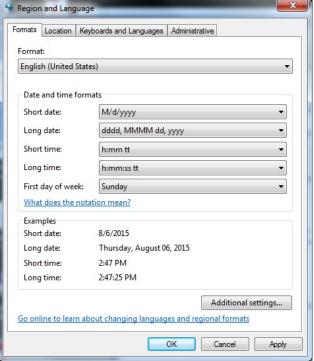
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer's number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g. "Italian (Italy)") to "English (United States)" (see screen shots below)

When you do this the number "twelve million dollars and thirty five cents" would change from \$12.000.000,35 (Italy format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the USITC foreign producer questionnaire form. When you finish reporting the data then you can close the questionnaire and switch back to Italy settings.





# **HOW TO FILE YOUR QUESTIONNAIRE RESPONSE**

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at: LINK

**Please do not attempt to modify the format or permissions of the questionnaire document.** Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

• <u>Upload via Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> Pin: FOIL

• E-mail.—E-mail your questionnaire to celia.feldpausch@usitc.gov; include a scanned copy of the signed certification page (page 1). Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure drop-box system and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm's nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.

**If your firm did not produce or export this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

**Parties to this proceeding.**—If your firm is a party to this proceeding, you are required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission's Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7).