

## U.S. IMPORTERS' QUESTIONNAIRE

### SUPERABSORBENT POLYMERS FROM SOUTH KOREA

This questionnaire must be received by the Commission by **August 3, 2022**.  
*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 antidumping investigation concerning superabsorbent polymers ("SAP") from South Korea (Inv. No. 731-TA-1574 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Website \_\_\_\_\_

Has your firm imported SAP (as defined on next page) from any country at any time since January 1, 2019?

- ☐ **NO** (Sign the certification below and promptly return **only** this page of the questionnaire to the Commission)  
☐ **YES** (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

Return questionnaire via the U.S. International Trade Commission **Drop Box** by clicking on the following link: <https://dropbox.usitc.gov/oinv/>. (PIN: **POLY**)

#### CERTIFICATION

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.*

*I, the undersigned, acknowledge that information submitted in response to this request for information and throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements.*

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

\_\_\_\_\_  
Email address

**PART I.—GENERAL INFORMATION**

**Background.**-- This proceeding was instituted in response to a petition filed on November 2, 2021, by the Ad Hoc Coalition of American SAP Producers, whose members include BASF Corporation, Florham Park, New Jersey; Evonik Superabsorber LLC, Greensboro, North Carolina; and Nippon Shokubai America Industries, Inc., Pasadena, Texas. Antidumping duties may be assessed on the subject imports as a result of this proceeding 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 dumping. Questionnaires and other information pertinent to this proceeding are available at

[https://www.usitc.gov/investigations/701731/2021/superabsorbent\\_polymers\\_korea/final.htm](https://www.usitc.gov/investigations/701731/2021/superabsorbent_polymers_korea/final.htm).

**SAP** covered by this investigation is superabsorbent polymers (SAP), which is cross-linked sodium polyacrylate most commonly conforming to Chemical Abstracts Service (CAS) registry number 9003-04-7, where at least 90 percent of the dry matter, by weight on a nominal basis, corrected for moisture content, is comprised of a polymer with a chemical formula of  $(C_3H_3O_2Na_xH_{1-x})_n$ , where  $x$  is within a range of 0.00-1.00 and there is no limit to  $n$ . The subject merchandise also includes merchandise with a chemical formula of  $\{(C_2H_3) COONa_yH_{(1-y)}\}_n$ , where  $y$  is within a range of 0.00-1.00 and there is no limit to  $n$ . The subject merchandise includes SAP which is fully neutralized as well as SAP that is not fully neutralized.

The subject merchandise may also conform to CAS numbers 25549-84-2, 77751-27-0, 9065-11-6, 9033-79-8, 164715-58-6, 445299-36-5, 912842-45-6, 561012-86-0, 561012-85-9, or 9003-01-4.

All forms and sizes of SAP, regardless of packaging type, including but not limited to granules, pellets, powder, fibers, flakes, liquid, or gel are within the scope of this investigation. The scope also includes SAP whether or not it incorporates additives for anticaking, anti-odor, anti-yellowing, or similar functions.

The scope also includes SAP that is combined, commingled, or mixed with other products after final sieving. For such combined products, only the SAP component is covered by the scope of this investigation. SAP that has been combined with other products is included within the scope, regardless of whether the combining occurs in third countries. A combination is excluded from this investigation if the total SAP component of the combination (regardless of the source or sources) comprises less than 50 percent of the combination, on a nominal dry weight basis.

SAP is classified under the Harmonized Tariff Schedule of the United States (HTSUS) subheading 3906.90.50. SAP may also be imported into the United States under HTSUS subheading 3906.10.00. Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the merchandise is dispositive.

**Definitions.**

**"SAP-7."**--Proprietary SAP Generation 7 ("SAP-7") SAP-7 is designed for use in baby diapers and features an effective capacity ("EFC") of more than 25.0 g/g and a T20 rating of less than 170 seconds. SAP-7 excludes the product that meets the more stringent test parameters defined as SAP-8.

**"SAP-8."**--Proprietary grade of SAP is designed to be used without wood pulp in baby diapers and features EFC of more than 25.5 g/g and a T20 rating of less than 145 seconds.

**“Next-LK1.”**--Proprietary Next-LK1 features a guaranteed absorbency under load value tested at 0.9 psi and vortex with less than 50 seconds. LK1 excludes the product that meets the more stringent test parameters defined as Next-LK2.

**“Next-LK2.”**--Proprietary Next-LK2 features a guaranteed absorbency under load value tested at 0.9 psi and vortex with less than 35 seconds.

**Importer.**--Any person or firm engaged, either directly or through a parent company or subsidiary, in importing SAP (as defined above) into the United States from a foreign manufacturer or through its selling agent.

**Reporting of information.**--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, and/or purchaser questionnaire), you need not respond to duplicated questions.

**Confidentiality.**--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.

**Verification.**--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.

**Valid number error messages.**--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](mailto:celia.feldpausch@usitc.gov)).

**D-GRIDS tool.**--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage ([https://www.usitc.gov/trade\\_remedy/question.htm](https://www.usitc.gov/trade_remedy/question.htm)) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is optional. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

- I-1. **OMB statistics.**--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 40 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-2a. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire.

**"Establishment"**--Each facility of a firm involved in the importation of SAP, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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I-2b. **Stock symbol information.**--If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: \_\_\_\_\_.

I-2c. **External counsel.**--If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

I-3. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

☐ No                      ☐ Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

***“Related firm”***--A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

I-4. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing SAP from South Korea into the United States or that are engaged in exporting SAP from South Korea to the United States?

☐ No                      ☐ Yes--List the following information.

Firm name	Country	Affiliation

I-5. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of SAP?

☐ No                      ☐ Yes--List the following information.

Firm name	Country	Affiliation

I-6. **Importing operations.**--Please indicate the nature of your firm's importing operations of SAP. More than one answer may be applicable.

Importer of record	Takes title to the imported product(s)	Consignee of the imported products(s)	Customs broker or freight forwarder
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-7. **Consignee.**--If your firm is an importer of record of SAP but is not the consignee, please list the consignees below (firm name, address, telephone number, and individual to contact).

Firm name	Address	Contact person and phone number

- I-8. **FTZ, TIB, or bonded warehouses.**--Please indicate whether your firm enters SAP into, or withdraws such merchandise from, foreign trade zones or bonded warehouses. Also indicate whether your firm imports SAP under the TIB (temporary importation under bond) program.

**“Foreign trade zone”** is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise, as well as other savings. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

**“Bonded warehouse”** is a secured facility supervised by U.S. customs, where dutiable landed imports are stored pending their re-export, or release after payment of import duties, taxes, and other charges. A bonded warehouse must be designed as such pursuant to the rules and procedures set forth in 19 U.S.C. § 1555.

**“Temporary Importation under Bond (“TIB”) program”** is a procedure whereby imported merchandise may be entered under certain conditions for a limited time into the United States free of duty. Under the program, an importer posts a bond for twice the amount of duty, taxes, etc. that would otherwise be owed on the importation and agrees to export or destroy the merchandise within a specified time or pay liquidated damages. This program is restricted to certain categories of merchandise listed in subheadings 9813.00.05 through 9813.00.75 of the Harmonized Tariff Schedule of the United States (HTS).

Item	No	Yes
Foreign trade zones	<input type="checkbox"/>	<input type="checkbox"/>
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>
Temporary importation under bond	<input type="checkbox"/>	<input type="checkbox"/>

- I-9. **Other trade actions.**--To your knowledge, have the products subject to this proceeding been the subject of any other import relief proceedings in the United States or in any other countries?

No	Yes	If yes, Yes--Please specify.
<input type="checkbox"/>	<input type="checkbox"/>	

**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](mailto:celia.feldpausch@usitc.gov)). **Supply all data requested on a calendar-year basis.**

- II-1. **Contact information.**--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. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the importation of SAP since January 1, 2019.

<i>(check as many as appropriate)</i>		<i>(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)</i>
<input type="checkbox"/>	Office/warehouse openings	
<input type="checkbox"/>	Office/warehouse closings	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Prolonged shutdowns or importation curtailments	
<input type="checkbox"/>	Revised labor agreements	
<input type="checkbox"/>	Weather related events	
<input type="checkbox"/>	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 your firm's supply chain arrangements, importation, employment, and shipments relating to SAP? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

No	Yes	If yes, describe these changes including a separate discussion of the (a) supply chain impact, (b) importation and shipment impact, and (c) employment impact of the COVID-19 pandemic.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-3a. **Arranged imports.**--Has your firm imported or arranged for the importation of SAP for delivery after **June 30, 2022**?

**"Arranged imports"** are imports for which your firm has placed an order with a foreign supplier for subject merchandise, but delivery of those imports is not scheduled to occur until after the date listed above.

No	Yes	If yes, fill out the table below.
<input type="checkbox"/>	<input type="checkbox"/>	

Source	Period			
	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023
	Quantity (in metric tons, dry weight)			
South Korea				
All other sources				

- II-3b. **Imports in the 12-month period preceding the petition.**--Has your firm imported SAP from any source between November 1, 2020 and October 31, 2021? (i.e., the last two months in 2020 and the first ten months of 2021)?

No	Yes	If yes, report the quantity of such import below by source.
<input type="checkbox"/>	<input type="checkbox"/>	

Quantity (in metric tons, dry weight)	
Source	November 2020 through October 2021
South Korea	
All other sources	

- II-4a. **Out-of-scope imports by calendar year.**--Report your firm's imports of any out-of-scope products (i.e., products other than SAP) imported under HTS statistical reporting number 3906.90.5000 from any source for the specified periods.

<b>Quantity (in metric tons, dry weight), value (in \$1,000)</b>					
<b>Item</b>	<b>Calendar year</b>			<b>January-June</b>	
	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2021</b>	<b>2022</b>
<b>Out-of-scope products imported under HTS subheading number 3906.90.5000<sup>1</sup></b>					
South Korea:					
<i>Quantity</i>					
<i>Value</i>					
All other sources:					
<i>Quantity</i>					
<i>Value</i>					
<sup>1</sup> Please describe the out-of-scope products: _____.					

- II-4b. **Out-of-scope imports in the 12-month period preceding the petition.**--Report your firm's imports of any out-of-scope products (i.e., products other than SAP) imported under HTS subheading number 3906.90.5000, from any source between November 1, 2020 and October 31, 2021 (i.e., the first ten months in 2021 and last two months in 2020 combined).

<b>Quantity (in metric tons, dry weight)</b>	
<b>Source</b>	<b>November 2020 through October 2021</b>
<b>Out-of-scope products imported under HTS subheading number 3906.90.5000<sup>1</sup></b>	
South Korea	
All other sources	

- II-5. **Reasons for importing if producer.**--If your firm also produces SAP in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate.

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**Definitions**

***“Imports”***—Those products identified for Customs purposes as imports for consumption for which your firm was the importer of record (i.e., was responsible for paying any import duty).

***“Import quantities”*** —Quantities reported should be net of returns.

***“Import values”***—Values reported should be landed, duty-paid values at the U.S. port of entry, including ocean freight and insurance costs, brokerage charges, and import duties (i.e., all charges except inland freight in the United States).

***“Commercial U.S. shipments”***— Shipments made within the United States as a result of an arm’s length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

***“Internal consumption”*** —Product consumed internally by your firm. Such transactions are valued at fair market value.

***“Transfers to related firms”*** —Shipments made to related firms. Such transactions are valued at fair market value.

***“Related firm”***—A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

***“Export shipments”***— Shipments to destinations outside the United States, 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-6a. **U.S. imports from South Korea.**—Report your firm's imports and your firm's shipments and inventories of SAP imported from South Korea by your firm during the specified periods.

## South Korea

Quantity (in metric tons, dry weight), value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports<sup>1</sup>—</b> <b>SAP:</b>					
Quantity (B)					
Value (C)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (D)					
Value (E)					
<b>Internal consumption:<sup>2</sup></b>					
Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:<sup>2</sup></b>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:<sup>3</sup></b>					
Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					
<p><sup>1</sup> Please identify the foreign producers, if known: ____.</p> <p><sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p><sup>3</sup> Identify your firm's principal export markets: _____.</p>					

II-6a. **U.S. imports from South Korea.–Continued**

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). 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.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-6b. **Channels of distribution: South Korea.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from South Korea by channel of distribution during the specified periods.

## South Korea

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Quantity (in metric tons, dry weight)</b>					
<b>Channels of distribution:</b>					
<b>U.S. shipments:</b>					
To distributors (M)					
to Hygiene-related end users (N)					
to Non-hygiene-related end users (O)					

**RECONCILIATION OF CHANNELS.**-- Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year			January-June	
	2019	2020	2021	2021	2022
M + N + O – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

- II-6c. **U.S. shipments by product grade: South Korea.** -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by SAP grade for 2019-21 and January-June 2021 and January-June 2022.

## South Korea

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Quantity (in metric tons, dry weight), value (in \$1,000)</b>					
<b>U.S. shipments by SAP grade:</b>					
SAP-7: Quantity (P)					
Value (Q)					
SAP-8: Quantity (R)					
Value (S)					
Next-LK1: Quantity (T)					
Value (U)					
Next-LK2: Quantity (V)					
Value (W)					
All other SAP grades or products: <sup>1</sup> Quantity (X)					
Value (Y)					
<sup>1</sup> Please identify the other products: _____.					

**RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE.** --Please ensure that the quantities and values reported for U.S. shipment by product type (i.e., lines P through Y) in 2019-21 and January-June 2021 and January-June 2022 equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in 2021. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year			January-June	
	2019	2020	2021	2021	2022
Quantity: $P + R + T + V + X - D - F - H$ = zero ("0"), if not revise.	0	0	0	0	0
Value: $Q + S + U + W + Y - E - G - I$ = zero ("0"), if not revise.	0	0	0	0	0

- II-7a. **Imports from all other sources.**—Report your firm's imports and your firm's shipments and inventories of SAP imported from **all other sources** by your firm during the specified periods.

## All other sources

(list sources: \_\_\_\_\_)

Quantity (in metric tons, dry weight), value (in \$1,000)					
Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports<sup>1</sup>—</b>					
<b>SAP:</b>					
Quantity (B)					
Value (C)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (D)					
Value (E)					
<b>Internal consumption:<sup>2</sup></b>					
Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:<sup>2</sup></b>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:<sup>3</sup></b>					
Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					

<sup>1</sup> Please identify the foreign producers, if known: \_\_\_\_\_.

<sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>3</sup> Identify your firm's principal export markets: \_\_\_\_\_.

II-7a. **U.S. imports from all other sources.**—Continued

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.**—Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., line B), less total shipments (i.e., lines D, F, H, and J). 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.

Reconciliation	Calendar year			January-June	
	2019	2020	2021	2021	2022
A + B – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-7b. **Channels of distribution: All other sources.**—Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution during the specified periods.

## All other sources

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Quantity (in metric tons, dry weight)</b>					
<b>Channels of distribution:</b>					
<b>U.S. shipments:</b>					
To distributors (M)					
to Hygiene-related end users (N)					
to Non-hygiene-related end users (O)					

**RECONCILIATION OF CHANNELS.**— Please ensure that the quantities reported for channels of distribution (i.e., lines M, N and O) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year			January-June	
	2019	2020	2021	2021	2022
M + N + O – D – F – H = zero ("0"), if not revise.	0	0	0	0	0



- II-7c. **U.S. shipments by product grade: all other sources.** -- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by SAP grade for 2019-21 and January-June 2021 and January-June 2022 from all other sources.

## All other sources

Item	Calendar year			January-June	
	2019	2020	2021	2021	2022
<b>Quantity (in metric tons, dry weight), value (in \$1,000)</b>					
<b>U.S. shipments by SAP grade:</b>					
SAP-7:					
Quantity (P)					
Value (Q)					
SAP-8:					
Quantity (R)					
Value (S)					
Next-LK1:					
Quantity (T)					
Value (U)					
Next-LK2:					
Quantity (V)					
Value (W)					
All other SAP grades or products: <sup>1</sup>					
Quantity (X)					
Value (Y)					
<sup>1</sup> Please identify the other products: _____.					

**RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE.** --Please ensure that the quantities and values reported for U.S. shipment by product type (i.e., lines P through Y) in 2019-21 and January-June 2021 and January-June 2022 equal the quantity and value reported for U.S. shipments (i.e., lines D through I) in 2021. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year			January-June	
	2019	2020	2021	2021	2022
Quantity: $P + R + T - D - F - H = \text{zero}$ ("0"), if not revise.	0	0	0	0	0
Value: $Q + S + U - E - G - I = \text{zero}$ ("0"), if not revise.	0	0	0	0	0

- II-8. **Transfers to related firms.**--If your firm reported transfers to related firms in any of the data tables in part II, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary) and whether the transfers were priced at market value or by a non-market formula.

--

- II-9. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative response 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.

--

**PART III.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from Cindy Cohen (202-205-3230, cindy.cohen@usitc.gov).

- III-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in part III.

Name	
Title	
Email	
Telephone	

**PRICE DATA**

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2019, of the following products your firm imported from South Korea and **sold pursuant to a contract/agreement of one year or more in duration, in sales volumes of at least 500 kg:**

**Product 1.**-- Permeable and fast SAP for thin or ultra-thin hygiene products, including the following parameters:

- vortex speed of 45 seconds or less;
- gel bed permeability ("GBP") of 30 or greater; and
- centrifuge retention capacity ("CRC") within a range of 27 to 33 g/g.

**Product 2.**-- Balanced absorption under pressure ("AAP") SAP for balanced to thin hygiene products, including the following parameters:

- AAP 0.7 psi within a range of 18 to 24 g/g;
- GBP of less than 10; and
- CRC within a range of 34 to 42 g/g.

**Product 3.**-- Permeable and Pressure-resistant SAP for thin or ultra-thin hygiene products, including the following parameters:

- AAP under 0.7 psi ("AAP") within a range of 19 to 30 g/g; and
- CRC within a range of 26 to 33 g/g.

**Please note that values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).**

During January 2019-June 2022, did your firm import from South Korea and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question III-3.

III-2a. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from South Korea and sold by your firm.

## South Korea

Report data in metric tons, dry weight and actual dollars (not 1,000s).

Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
<b>2019:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2020:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2021:</b>						
January-March						
April-June						
July-September						
October-December						
<b>2022:</b>						
January-March						
April-June						

<sup>1</sup> Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred.

<sup>2</sup> Pricing product definitions are provided on the first page of Part III.

**Note.**--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data. In addition, please list the specific grades and the names of the customers to whom you sold each of these products.

Product 1:

Product 2:

Product 3:

III-2b. **Price data checklist.**--Please check that the pricing data in question III-2(a) has been correctly reported.

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000) and metric tons, dry weight?	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have discounts, rebates, and returns been credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Quantities do not exceed commercial shipments reported in part II in each year?	<input type="checkbox"/>
Limited to contracts/agreements of one year or more in duration?	<input type="checkbox"/>
Limited to sales in volumes of at least 500kg?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

III-2c. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

- III-3. **Price setting.**--How does your firm determine the prices that it charges for sales of SAP (*check all that apply*)?

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-4. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-5. **Pricing terms.**--On what basis are your firm's prices of imported SAP from South Korea usually quoted (*check one*)?

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

- III-6. **Contract versus spot.**--Approximately what share of your firm's sales of SAP imported from South Korea in 2021 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

Item	Type of sale				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	
Share of 2021 sales	%	%	%	%	0.0 %

III-7. **Contract provisions.**—

- (a) Please fill out the table regarding your firm's typical sales contracts for SAP imported from South Korea (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation (during contract period)	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	Quantity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Please provide a brief explanation of your firm's pricing formula(s), which should include a specific description of how propylene, caustic acid, and acrylic acid index prices are included in the formula(s). Also indicate how often prices are updated for changes in the index, and any lag between changes in the index and changes in SAP price.

--

III-7. **Contract provisions.**— Continued

(c) Please list the following information your firm's five largest SAP contracts with U.S. customers.

Customer name	Start/end dates	SAP grade(s)	How prices determined ( <i>i.e.</i> , fixed, indexed to raw materials)	Formula and/or index for determining price	Frequency of updates to contract/index price

(d) Since January 1, 2019, have prices changed during any of these contracts, aside from raw material indexed formula price changes specified in the contract?

No	Yes	If yes, please explain, noting the specific contract, when the price change occurred, and the reasons for the change.
<input type="checkbox"/>	<input type="checkbox"/>	

(e) Describe any contract negotiations for sales of SAP your firm has engaged in since January 1, 2019.

--

III-8. **Lead times.**--What is your firm's share of sales of SAP imported from South Korea from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of SAP?

Source	Share of 2021 sales	Lead time (Average number of days)
From your firm's U.S. inventory	%	
From foreign manufacturers' inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	



III-9. **Shipping information.**—

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm   ☐ Purchaser (check one)
- (b) When your firm sells SAP imported from South Korea, from where is it shipped?  
☐ Point of importation   ☐ Storage facility (check one)
- (c) Indicate the approximate percentage of your firm's sales of SAP imported from South Korea that are delivered the following distances from your firm's U.S. point of shipment.

Distance from your firm's U.S. point of shipment	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- III-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold SAP imported from subject countries since January 1, 2019 (check all that apply)?

Geographic area	South Korea
<b>Northeast.</b> —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> —AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> —CA, OR, and WA.	<input type="checkbox"/>
<b>Other.</b> —All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>

- III-11. **Inland transportation costs.**—What is the approximate percentage of the cost of SAP imported from South Korea that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.

III-12. **End uses.**--List the end uses of the SAP that your firm imports. For each end-use product, what percentage of the total cost is accounted for by SAP and other inputs?

End-use product	Share of total cost of end-use product accounted for by		Total (should sum to 100.0% across)
	SAP	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

III-13. **Substitutes.**--Can other products be substituted for SAP?

☐ No

☐ Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for SAP?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

III-14. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for SAP has changed since January 1, 2019. Explain any trends and describe the principal factors that have affected these changes in demand, including any differences in the demand for different grades of SAP.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-15. **Product changes.**--Have there been any significant changes in the product range, product mix or marketing of SAP since January 1, 2019?

No	Yes	If yes, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-16. **Conditions of competition.**—

- (a) Is the SAP market subject to business cycles and/or other conditions of competition distinctive to SAP?

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to next question.
<input type="checkbox"/> Yes-Business cycles (e.g., seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

- (b) If yes, have there been any changes in the business cycles or conditions of competition for SAP since January 1, 2019?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

**III-17. Supply constraints.—**

- (a) Has your firm refused, declined, or been unable to supply SAP at any time between January 1, 2019 and November 2, 2021 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

<b>No</b>	<b>Yes</b>	<b>If yes, please describe, including the reason, timing, and duration of the constraint, and the specific customers and SAP products affected.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Has your firm experienced any supply constraints since the petition was filed on November 2, 2021?

<b>No</b>	<b>Yes</b>	<b>If yes, please describe, including the reason, timing, and duration of the constraint, and the specific customers and SAP products affected.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

**III-18. Raw materials.—How have SAP raw material prices changed since January 1, 2019?**

<b>Overall increase</b>	<b>No change</b>	<b>Overall decrease</b>	<b>Fluctuate with no clear trend</b>	<b>Explain, noting how raw material price changes have affected your firm's selling prices for SAP.</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III-19. **Interchangeability.**--Is SAP produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or O in the table below:

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

O = *no familiarity* with products from a specified country-pair

Country-pair	South Korea	Other countries
United States		
South Korea		
For any country-pair producing SAP that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:		

III-20. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between SAP produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or O in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

O = *no familiarity* with products from a specified country-pair

Country-pair	South Korea	Other countries
United States		
South Korea		
For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of SAP, identify the country-pair and relevant factors and report the advantages or disadvantages imparted by such factors:		

III-21. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for SAP since January 1, 2019. Indicate the share of the quantity of your firm's U.S. shipments of SAP that each of these customers accounted for in 2021.

	Customer's name	City	State	Share of 2021 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

III-22. **Other explanations.**--If your firm would like to further explain a response to a question in Part III for which a narrative response 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.

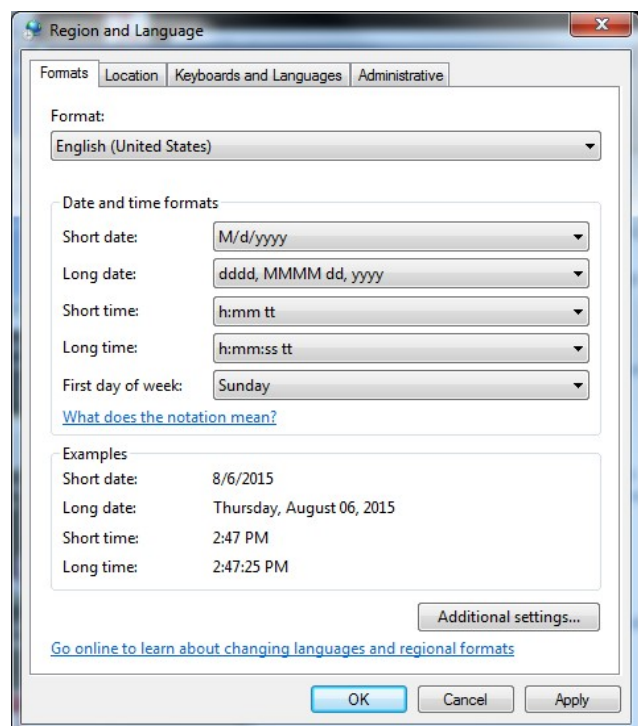
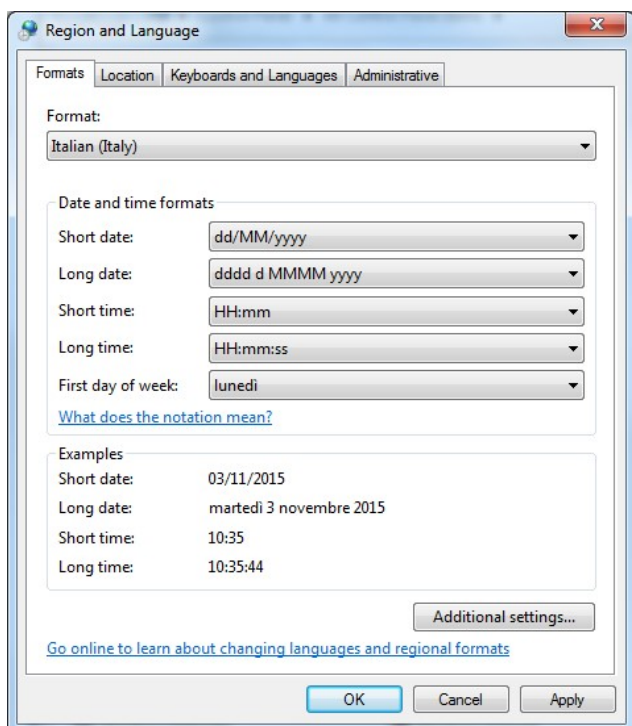
**Correcting valid number error messages.**--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form fields. This issue stems from your computer's number formatting setting (i.e., 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 and other 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 set-up in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU or other country 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 importer questionnaire form. When you finish reporting the data then you can close the questionnaire and switch back to Italy (or your country) 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:

[https://www.usitc.gov/investigations/701731/2021/superabsorbent\\_polymers\\_korea/final.htm](https://www.usitc.gov/investigations/701731/2021/superabsorbent_polymers_korea/final.htm).

***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.

- **Upload via Secure Drop Box.**—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:** <https://dropbox.usitc.gov/oinv/>

**Pin:** **POLY**

- **E-mail.**—E-mail the MS Word questionnaire to [celia.feldpausch@usitc.gov](mailto: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 import 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, it is 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 (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7).