U.S. IMPORTERS' QUESTIONNAIRE

2,4-DICHLOROPHENOXYACETIC ACID (2,4-D) FROM CHINA AND INDIA

This questionnaire must be received by the Commission by March 28, 2024

See last page for instructions regarding how to file this questionnaire.

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 2,4-Dichlorophenoxyacetic Acid ("2,4-D") from China and India (Inv. Nos. 701-TA-710-711 and 731-TA-1673-1674 (Preliminary)). 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

| City | | | | | | | | | |
|--|---|--|--|---|--|--|---|--|--|
| Website | | | | | - | | | | |
| Has your firm | imported 2, | I-D (as defined on | n next page) from | n any cou | ıntry at ar | y time since | January 1, | 2021? | |
| □NO | (Sign the ce | tification below and | d promptly return | only this | page of the | questionnaire | e to the Cor | nmission) | |
| ☐ YES | (Complete a | ll parts of the quest | tionnaire, and retu | ırn the en | tire questic | nnaire to the | Commissio | n) | |
| iink: <u>nttps:</u> | /usitc.gov/0 | portal. (PIN: PI | LANTJ. See last | page to | r detaile | a instructio | ns. | | |
| edge and belief a | nd understaı | in supplied in re | nation submitte | question ed is subj | ect to au | lit and verifi | cation by | the Comi | mission. |
| edge and belief a of this certifica ation provided in mmission on the s undersigned, ack ding or other pro nel (a) for develons, and evaluation | nd understartion I also gothis question ame or simil nowledge the occeedings makes are relating as relating as governme | nd that the inform rant consent for nnaire and throu | esponse to this mation submitted the Commission of this process of this or a personnel, and contract person | questioned is subject, and eeding in sponse to by the Core related judges of the core and operated judges of the core and | ect to audits emplo and any other of this requires or this requires or this requires or this requires or this of the section o | lit and verifi yees and co er import-inj uest for info n, its employ g, or (b) in i he Commiss | ication by ontract pe ury process ormation of the contraction of the contraction including the contraction of the contraction | the Comi ersonnel, edings con and throu Offices, ar vestigatic ding unde | mission. to use nducted ighout i nd conti ons, aud er 5 U. |
| edge and belief a of this certifica ation provided in mmission on the s undersigned, ack ding or other pro nel (a) for develons, and evaluation | nd understantion I also gothis question ame or simil nowledge the occeedings mains relating as relating as governmentign appropri | nd that the information to the consent formative and through ar merchandise. The consent formation is the disclosed to the programs, and employees and | esponse to this mation submitter the Commission ghout this process ubmitted in respondenced; (i) burds of this or a personnel, and contract person e agreements. | questioned is subject, and eeding in sponse to by the Core related judges of the core and operated judges of the core and | ect to audits emplo and any other of this requires or this requires or this requires or this requires or this of the section o | lit and verifi yees and co er import-inj uest for info n, its employ g, or (b) in i he Commiss | ication by ontract pe ury process ormation of the contraction of the contraction including the contraction of the contraction | the Comi ersonnel, edings con and throu Offices, ar vestigatic ding unde | mission. to use nducted ighout i nd conti ons, aud er 5 U. |

PART I.—GENERAL INFORMATION

Background. —This proceeding was instituted in response to petitions filed on March 14, 2024, by Corteva Agriscience LLC, Indianapolis, Indiana. Countervailing and 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 https://usitc.gov/reports/active_import_injury_questionnaires. https://ids.usitc.gov/case/8184/investigation/8537.

2,4-D covered by this proceeding is 2,4-dichlorophenoxyacetic acid ("2,4-D"). 2,4-D has the Chemical Abstracts Service ("CAS") registry number of 94-75-7 and the chemical formula $C_8H_6Cl_2O_3$. The 2,4-D component of any derivative products of 2,4-D, including but not limited to, amine salt and ester forms of 2,4-D are covered by the scope of the order.

Salt and ester forms of 2,4-D include, but are not limited to, 2,4-D salt (CAS 2702-72-9), 2,4-D diethanolamine salt (CAS 5742-19-8), 2,4-D dimethyl amine salt (CAS 2008-39-1), 2,4-D-isopropylamine salt (CAS 5742-17-6), 2,4-D triisopropanolamine salt (CAS 32341-80-3), 2,4-D BEE (CAS 1929-73-3), 2,4-D 2- ethylhexylester (CAS 1928-43-4), and 2,4-D -isopropylester (CAS 94-11-1). All 2,4-D, as well as the 2,4-D component of its salt and ester forms, is covered by the scope irrespective of purity, particle size, or physical form.

The conversion of a 2,4-D salt or ester from a subject 2,4-D acid, or the formulation of nonsubject merchandise with the subject 2,4-D, its salts, and its esters in the country of manufacture or in a third country does not remove the subject 2,4-D, its salts, or its esters from the scope. For any such formulations, only the 2,4-D, 2,4-D salt, and 2,4-D ester components of the mixture is covered by the scope of the order.

2,4-D, its salts, and its esters are currently imported under statistical reporting number 2918.99.2010 of the Harmonized Tariff Schedule of the United States (HTSUS). Other merchandise subject to the current scope, including the abovementioned formulations that may be imported under HTSUS statistical reporting numbers 3808.93.0500 and 3808.93.1500. The HTSUS provisions and CAS registry numbers are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Importer</u>. —Any person or firm engaged, either directly or through a parent company or subsidiary, in importing 2,4-D (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.

<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 Charles Cummings (202-708-1666, Charles.Cummings@usitc.gov).

<u>D-GRIDS tool.</u> —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 macroenabled MS Excel file available for download from the Commission's generic questionnaires webpage (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.

| U.S. Importers | ' Questionnaire | - 2,4-D (Prelim | inary) |
|----------------|-----------------|-----------------|--------|
|----------------|-----------------|-----------------|--------|

| I-1. | | | report below the actual number of hours required and the is questionnaire for use by the Office of Management and |
|------|-------|---------|---|
| | Hours | Dollars | |

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 provide such comments to the Office of Investigations, import injury@usitc.gov.

| | comments to the on | ice of filves | tigations, <u>import_injury@</u> | usite.gov. | |
|-------|--|--------------------|---|---------------------|---------------------|
| I-2a. | Establishments cove questionnaire. | <u>red</u> . —Prov | ide the name and address | of establishment(s | s) covered by this |
| | | | of a firm involved in the <u>im</u> n with (whether or not phy | - | _ |
| | | | | | |
| I-2b. | Stock symbol inform stock exchange and t | | your firm or parent firm is bol: | publicly traded, pl | ease specify the |
| I-2c. | · | • | or parent firm is represen he name of the law firm a | • | |
| | Law firm: | | | | |
| | Lead attorney(s): | | | | |
| I-3. | , | | d, in whole or in part, by a | • | ate parent/owner. |
| | Eirm namo | | Country | | Extent of ownership |

| Firm name | Country | Extent of ownership (percent) |
|-----------|---------|-------------------------------|
| | | |
| | | |
| | | |

"Related firm" —A firm that your firm solely or jointly owned, managed, or otherwise controlled;

U.S. Importers' Questionnaire – 2,4-D (Preliminary)

| that are engaged in ex | porting 2,4-D from China and/or India | or India into the United State to the United State (|
|------------------------|--|--|
| ☐ No ☐ Ye | —List the following information. | |
| Firm name | Country | Affiliation |
| | | |
| | | |
| | | |
| Related producers — | Does your firm have any related firms | either domestic or foreign |
| engaged in the produc | Does your firm have any related firms, tion of 2,4-D? 5—List the following information. | either domestic or foreign, |
| engaged in the produc | tion of 2,4-D? | either domestic or foreign, |
| engaged in the produc | tion of 2,4-D? —List the following information. | |
| engaged in the produc | tion of 2,4-D? —List the following information. | |
| engaged in the produc | tion of 2,4-D? —List the following information. | |

| U.S. Importers | ' Questionnaire – | 2,4-D (Preliminary) |
|----------------|-------------------|---------------------|
|----------------|-------------------|---------------------|

| I-6. | Importing operations. —Please indicate the nature of your firm's importing operations on 2,4- |
|------|---|
| | D. The importer of record is expected to complete this questionnaire; however, more than one |
| | answer may be applicable. |

| | Takes title to the | Consignee of the | Customs broker or |
|--------------------|---------------------|----------------------|-------------------|
| Importer of record | imported product(s) | imported products(s) | freight forwarder |
| | | | |

I-7. <u>Consignee</u>. —If your firm is an importer of record of 2,4-D 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. <u>FTZ or bonded warehouses</u>. —Please indicate whether your firm admits 2,4-D into, or withdraws such merchandise from, foreign trade zones or bonded warehouses.

"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.

| Item | No | Yes | Quantity (in 1,000 pounds dry weight acid equivalent) admitted in 2023 |
|---------------------|----|-----|--|
| Foreign trade zones | | | |
| Bonded warehouses | | | |

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. |
|----|-----|-----------------------------|
| | | |

PART II. —TRADE AND RELATED INFORMATION

Email Telephone

Further information on this part of the questionnaire can be obtained from Charles Cummings (202-708-1666, Charles.Cummings@usitc.gov). Supply all data requested on a calendar-year basis.

| II-1. | Contact inform | ation. —Please identify the responsibl | e individual and the manner by which | | |
|-------|---|--|--------------------------------------|--|--|
| | Commission staff may contact that individual regarding the confidential information submitted | | | | |
| | in part II. | | | | |
| | | | | | |
| | Name | | | | |
| | Title | | | | |

II-2a. <u>Changes in operations</u>. —Has your firm experienced any changes in ownership or in the nature of its importing operations for 2,4-D since January 1, 2021?

| No | Yes | If yes, supply details as to the time, nature, and significance of such changes and describe reasons for the changes, including any underlying assumptions used. |
|----|-----|--|
| | | |

II-2b. **COVID-19 pandemic.** —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 2,4-D? 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 the impact over time on the (a) supply chain, (b) importation and shipments, and (c) employment with respect to 2,4-D. |
|----|-----|---|
| | | |

| U.S. Importers | d' Questionnaire | – 2,4-D | (Preliminary) |
|----------------|------------------|---------|---------------|
|----------------|------------------|---------|---------------|

| II-3a. | Arranged imports. —Has your firm imported or arranged for the importation of 2,4-D for |
|--------|--|
| | delivery after December 31, 2023? |

"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. |

| | Period | | | |
|-------------------|---|--------------|---------------|---------------|
| Source | Jan-Mar 2024 | Apr-Jun 2024 | Jul-Sept 2024 | Sept-Dec 2024 |
| | Quantity (in 1,000 pounds dry weight acid equivalent) | | | |
| China | | | | |
| India | | | | |
| All other sources | | | | |

II-3b. <u>Imports in the 12-month period preceding the petition</u>. —Has your firm imported 2,4-D from any source between March 1, 2023 and February 29, 2024? (i.e., the last ten months in 2023 and first two months in 2024 combined)

| No | Yes | |
|----|-----|---|
| | | If yes, report the quantity of such import below by source. |

| Quantity (in 1,000 pounds dry weight acid equivalent) | | | | | |
|---|----------------------------------|-------------|--|--|--|
| | March 2023 through February 2024 | | | | |
| | Primary HTS number | All other | | | |
| Source | 2918.99.2010 | HTS numbers | | | |
| China | | | | | |
| India | | | | | |
| All other sources | | | | | |

| II-4. | <u>Reasons for importing if producer</u> . —If your firm also produces 2,4-D in the United States, please indicate the reasons for importing this product. If your firm's reasons differ by source, please elaborate. |
|-------|---|
| | |

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 including product transferred to your retail locations or warehouses for eventual retail level sale. 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.

"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-5a. <u>U.S. imports from China</u>. –Report your firm's imports and your firm's shipments and inventories of 2,4-D imported from China by your firm during the specified periods.

China

| Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000) | | | | |
|---|---------------|------|--------------------------|--|
| | Calendar year | | | |
| ltem | 2021 | 2022 | 2023 | |
| Beginning-of-period inventories (quantity) (A) | | | | |
| U.S. imports classified under:1 | | | | |
| Primary HTS number 2918.99.2010 | | | | |
| Quantity (B) | | | | |
| Value (C) | | | | |
| All other HTS numbers: ² | | | | |
| Quantity (D) | | | | |
| Value (E) | | | | |
| U.S. shipments: | | | | |
| Commercial shipments: | | | | |
| Quantity (F) | | | | |
| Value (G) | | | | |
| Internal consumption:3 | | | | |
| Quantity (H) | | | | |
| Value³ (I) | | | | |
| Transfers to related firms: ³ | | | | |
| Quantity (J) | | | | |
| Value³ (K) | | | | |
| Export shipments:4 | | | | |
| Quantity (L) | | | | |
| Value (M) | | | | |
| End-of-period inventories: (quantity) (N) | | | | |
| Please identify the foreign producers, if known: _ Please identify the other HTS statistical reporting Internal consumption and transfers to related firm | | | n uses a different basis | |
| for valuing these transactions in your records, please | | • | | |
| provided above in this table should be based on fair m | | | | |
| ⁴ Identify your firm's principal export markets: | | | | |

II-5a. U.S. imports from China. –Continued

<u>RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES</u>. —Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line A), plus imports (i.e., lines B and D), less total shipments (i.e., lines F, H, J, and L). 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 provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| | Calendar year | | |
|--|---------------|------|------|
| Reconciliation | 2021 | 2022 | 2023 |
| A + B + D - F - H - J - L - N = should equal zero ("0") or | | | |
| provide an explanation. ¹ | 0 | 0 | 0 |

¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.

II-5b. Channels of distribution: China. —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 China by channel of distribution during the specified periods.

China

| | Calendar year | | |
|---|---|------|------|
| Item | 2021 | 2022 | 2023 |
| | Quantity (in 1,000 pounds dry weight acid equivalent) | | |
| Channels of distribution: U.S. shipments: To distributors (O) | | | |
| To end users (including formulators) (P) | | | |

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

| | Calendar year | | |
|--|---------------|------|------|
| Reconciliation item | 2021 | 2022 | 2023 |
| O + P - F - H - J = zero ("0"), if not revise. | 0 | 0 | 0 |

II-5c. <u>U.S. shipments by form: China</u>. —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 China by chemical form in calendar year 2023.

China

| Quantity (in 1,000 pounds dry weight acid equivalent) | | | |
|--|----------------------------------|--|--|
| | Calendar year | | |
| Item | 2023 | | |
| U.S. shipments. — | | | |
| 2,4-dichlorophenoxyacetic acid (Q) | | | |
| 2,4-D dimethylamine salt (R) | | | |
| 2,4-D 2-ethylhexyl ester (S) | | | |
| All other products ¹ (T) | | | |
| ¹ List in order of commercial importance (volume) the other | r products shipped by your firm: | | |

RECONCILIATION OF U.S. SHIPMENTS BY TYPE. — Please ensure that the data reported for U.S. shipments by type (i.e., lines Q through T) in 2023 period equal the data reported for U.S. shipments (i.e., lines F, H, and J) in table II-5a in 2023. 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.

| | Calendar year |
|--|---------------|
| Reconciliation | 2023 |
| Quantity: $Q + R + S + T - F - H - J = $ should equal zero ("0") | 0 |

II-6a. <u>U.S. imports from India</u> –Report your firm's imports and your firm's shipments and inventories of 2,4-D imported from India by your firm during the specified periods.

India

| Quantity (<i>in 1,000 پ</i> | oounds dry weight acid | l equivalent), value (in \$1, | 000) |
|---|---|-------------------------------|------|
| | Calendar year | | |
| Item | 2021 | 2022 | 2023 |
| Beginning-of-period inventories (quantity) (A) | | | |
| U.S. imports classified under:1 Primary HTS number 2918.99.2010 Quantity (B) | | | |
| Value (C) | | | |
| All other HTS numbers: ² Quantity (D) | | | |
| Value (E) | | | |
| U.S. shipments: Commercial shipments: Quantity (F) Value (G) | | | |
| Internal consumption: ³ Quantity (H) | | | |
| Value³ (I) | | | |
| Transfers to related firms: ³ Quantity (J) | | | |
| Value³ (K) | | | |
| Export shipments: ⁴ Quantity (L) | | | |
| Value (M) | | | |
| End-of-period inventories : (quantity) (N) | | | |
| ¹ Please identify the foreign producers, if kn ² Please identify the other HTS statistical replacements of the statist | porting numbers used to ted firms must be valued please specify that basis on fair market value. | at fair market value. If your | |
| ⁴ Identify your firm's principal export marke | ts: | | |

II-6a. <u>U.S. imports from India</u>—Continued

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

| | Calendar year | | |
|--|---------------|------|------|
| Reconciliation | 2021 | 2022 | 2023 |
| A + B + D - F - H - J - L - N = should equal | | | |
| zero ("0") or provide an explanation.1 | 0 | 0 | 0 |

¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.

II-6b. <u>Channels of distribution: India</u>. —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 India by channel of distribution during the specified periods.

India

| | Calendar year | | | |
|--|---|--|--|--|
| Item | 2021 2022 2023 | | | |
| | Quantity (in 1,000 pounds dry weight acid equivalent) | | | |
| Channels of distribution: | | | | |
| U.S. shipments: | | | | |
| To distributors (O) | | | | |
| To end users (including formulators) (P) | | | | |

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

| | Calendar year | | | |
|--|---------------|------|------|--|
| Reconciliation item | 2021 | 2022 | 2023 | |
| O + P - F - H - J = zero ("0"), if not | | | | |
| revise. | 0 | 0 | 0 | |

II-6c. <u>U.S. shipments by form: India</u>. —Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, transfers to related firms) of imports from India by chemical form in calendar year 2023.

India

| Quantity (in 1,000 pounds dry weight acid equivalent) | | | |
|---|----------------------------------|--|--|
| | Calendar year | | |
| Item | 2023 | | |
| U.S. shipments. — | | | |
| 2,4-dichlorophenoxyacetic acid (Q) | | | |
| 2,4-D dimethylamine salt (R) | | | |
| 2,4-D 2-ethylhexyl ester (S) | | | |
| All other products ¹ (T) | | | |
| ¹ List in order of commercial importance (volume) the othe | r products shipped by your firm: | | |

RECONCILIATION OF U.S. SHIPMENTS BY TYPE. — Please ensure that the data reported for U.S. shipments by type (i.e., lines Q through T) in 2023 period equal the data reported for U.S. shipments (i.e., lines F, H, and J) in table II-6a in 2023. 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.

| | Calendar year |
|--|---------------|
| Reconciliation | 2023 |
| Quantity: $Q + R + S + T - F - H - J = $ should equal zero ("0") | 0 |

II-7a. <u>Imports from all other sources</u>. –Report your firm's imports and your firm's shipments and inventories of 2,4-D imported from all other sources (i.e., sources other than China and India) by your firm during the specified periods.

All other sources

| Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000) | | | | |
|---|------------------------|----------------------------|-------------------|--|
| | Calendar year | | | |
| Item | 2021 | 2022 | 2023 | |
| Beginning-of-period inventories (quantity) (A) | | | | |
| U.S. imports classified under:1 | | | | |
| Primary HTS number 2918.99.2010 | | | | |
| Quantity (B) | | | | |
| Value (C) | | | | |
| All other HTS numbers: ² | | | | |
| Quantity (D) | | | | |
| Value (E) | | | | |
| U.S. shipments: | | | | |
| Commercial shipments: | | | | |
| Quantity (F) | | | | |
| Value (G) | | | | |
| Internal consumption: ³ | | | | |
| Quantity (H) | | | | |
| Value³ (I) | | | | |
| Transfers to related firms: ³ | | | | |
| Quantity (J) | | | | |
| Value³ (K) | | | | |
| Export shipments:4 | | | | |
| Quantity (L) | | | | |
| Value (M) | | | | |
| End-of-period inventories: (quantity) (N) | | | | |
| Please identify the foreign producers, if known: Please identify the other HTS statistical reporting nums Internal consumption and transfers to related firms refor valuing these transactions in your records, please specified. | must be valued at fair | market value. If your firm | | |
| provided above in this table should be based on fair mar | | ost, cost pius, etc.j | However, the data | |
| ⁴ Identify your firm's principal export markets: | | | | |

II-7a. Imports from all other sources. –Continued

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

| | Calendar year | | | | |
|--|---------------|------|------|--|--|
| Reconciliation | 2021 | 2022 | 2023 | | |
| A + B + D - F - H - J - L - N = should equal | | | | | |
| zero ("0") or provide an explanation.1 | 0 | 0 | 0 | | |

¹ 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 (i.e., sources other than China and India) by channel of distribution during the specified periods.

All other sources

| | Calendar year | | | | |
|--|-------------------|----------------------|------------------|--|--|
| Item | 2021 | 2022 | 2023 | | |
| | Quantity (in 1,00 | 00 pounds dry weight | acid equivalent) | | |
| Channels of distribution: | | | | | |
| U.S. shipments: | | | | | |
| To distributors (O) | | | | | |
| To end users (including formulators) (P) | | | | | |

<u>RECONCILIATION OF CHANNELS</u>. —Please ensure that the quantities reported for channels of distribution (i.e., lines O and P) in each time period equal the quantity reported for U.S. shipments (i.e., line F, H, and J) 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.

| | Calendar year | | | |
|--|---------------|------|------|--|
| Reconciliation item | 2021 | 2022 | 2023 | |
| O + P - F - H - J = zero ("0"), if not revise. | 0 | 0 | 0 | |

II-7c. <u>U.S. shipments by form: All other sources</u>. —Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, transfers to related firms) of imports from all other sources (i.e., sources other than China and India) by chemical form in calendar year 2023.

All other sources

| Quantity (in 1,000 pounds dry weig | ht acid equivalent) |
|---|----------------------------------|
| | Calendar year |
| Item | 2023 |
| U.S. shipments. — | |
| 2,4-dichlorophenoxyacetic acid (Q) | |
| 2,4-D dimethylamine salt (R) | |
| 2,4-D 2-ethylhexyl ester (S) | |
| All other products ¹ (T) | |
| ¹ List in order of commercial importance (volume) the othe | r products shipped by your firm: |

RECONCILIATION OF U.S. SHIPMENTS BY TYPE. — Please ensure that the data reported for U.S. shipments by type (i.e., lines Q through T) in 2023 period equal the data reported for U.S. shipments (i.e., lines F, H, and J) in table II-7a in 2023. 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.

| | Calendar year |
|--|---------------|
| Reconciliation | 2023 |
| Quantity: $Q + R + S + T - F - H - J = $ should equal zero ("0") | 0 |

| they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in | | | I firms. —If your firm reported transfers to related firms in any of the d |
|--|------------------------|--------------|--|
| Swaps. — Has your firm entered into any swap arrangements (i.e., shipments made in transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | | · |
| Swaps. — Has your firm entered into any swap arrangements (i.e., shipments made in transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | • | | · · · · · · · · · · · · · · · · · · · |
| transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | | |
| transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | | |
| transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | | |
| transactions that involve non-monetary transfers and/or reciprocal exclusive purchase agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | | |
| agreement with other entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | | |
| If yes, please identify the firm(s) involved (including whether or no they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | Swaps. – | - Has your | firm entered into any swap arrangements (i.e., shipments made in |
| they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | | • | · · · · · · · · · · · · · · · · · · · |
| they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | transactio | ns that inv | volve non-monetary transfers and/or reciprocal exclusive purchase |
| transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and | transactio | ns that inv | volve non-monetary transfers and/or reciprocal exclusive purchase er entities) since January 1, 2021? |
| exchange for the receipt of what merchandise from what firm and | transactio | ns that inv | volve non-monetary transfers and/or reciprocal exclusive purchase ter entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or no |
| | transactio | ns that inv | volve non-monetary transfers and/or reciprocal exclusive purchase er entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the |
| | transactio | ns that inv | volve non-monetary transfers and/or reciprocal exclusive purchase ter entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in |
| | transactic agreemer | ons that inv | volve non-monetary transfers and/or reciprocal exclusive purchase ter entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and |
| | transactic agreemer | ons that inv | volve non-monetary transfers and/or reciprocal exclusive purchase ter entities) since January 1, 2021? If yes, please identify the firm(s) involved (including whether or not they are related to your firm) and indicate the nature of the transactions (i.e., what merchandise is shipped to what firm in exchange for the receipt of what merchandise from what firm and |

| II-10. | 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. |
|--------|---|
| | |

PART III.—PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Hau Nguyen (202-708-1441, Hau.Nguyen@usitc.gov).

III-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 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, 2021 of the following products your firm imported from China and/or India:

Product 1.— 2,4-D acid, Form: white to brown crystalline solid

Product 2.— 2,4-D salt, Form: white or cream-colored power

Product 3.— 2,4-D salt, Form: amber aqueous liquid

Product 4.— 2,4-D 2-ethylhexylester ("EHE"), Form: dark amber liquid

Please note that values should be <u>f.o.b.</u>, <u>U.S.</u> <u>point of shipment</u> 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 2021-December 2023, did your firm import from China or India and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

| Yes.—Please complete the following pricing data tables as appropriate. |
|--|
| No.—Skip to question III-3. |

III-2a. <u>Price data</u>.—Report below the quarterly price data¹ for pricing products² imported from China and sold by your firm.

China

Report data in 1,000s of pounds dry weight acid equivalent and actual dollars (not 1,000s).

| (Qu | antity in 1,0 | 00s of pou | ınds dry weig | ht acid eq | <i>uivalent,</i> valu | e in dollar | s) | |
|--|-----------------|-------------|------------------|--------------|-----------------------|-------------|-----------------|-----------|
| | Produ | ıct 1 | Produ | ıct 2 | Produ | ct 3 | Produ | ct 4 |
| Period of shipment | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2021: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2022: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2023: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| ¹ Net values (i.e., gross sa firm's U.S. point of shipment. ² Pricing product definition | Please subtract | any discoun | ts, rebates, and | returns from | | | | o.b. your |
| Note. —If your firm's product of description of your firm's product of your firm's product of the product of t | | | | | | | product, provic | le a |
| Product 1: | | | | | | | | |
| Product 2: | | | | | | | | |
| Product 3: | | | | | | | | |
| Product 4: | | | | | | | | |

Product 4:

III-2b. <u>Price data</u>.—Report below the quarterly price data¹ for pricing products² imported from India and sold by your firm.

India

Report data in 1,000s of pounds dry weight acid equivalent and actual dollars (not 1,000s).

| | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
|---|--|---------------------------|---|--------------|-------------------|---------------|-----------|-------|
| Period of shipment | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2021: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2022: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2023: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| Net values (i.e., gross safirm's U.S. point of shipment. Pricing product definition Note.—If your firm's product description of your firm's product | Please subtract ons are provided does not exactl | any discound on the first | ts, rebates, and page of Part III. roduct specifica | returns from | the quarter in wo | the specified | occurred. | · |
| Product 1: | / | - 1 | , | , | 1 1 0 | | | |
| Product 2: | | | | | | | | |
| | | | | | | | | |
| Product 3: | | | | | | | | |

| III-2c. | Price data checklist.—Please check that the pricing data in question III-2(a) have been correctly |
|---------|---|
| | reported. |

| | √ if Y |
|--|--------|
| In actual dollars (<i>not</i> \$1,000) and 1,000s of pounds dry weight acid equivalent? | |
| Valued f.o.b. U.S. point of shipment (i.e., exclude U.S. inland transportation costs)? | |
| Reported net of all discounts, rebates, and returns (deducted from the quarter in which the original sale occurred)? | |
| Reported for commercial U.S. shipments only (i.e., exclude internal consumption, transfers, and exports)? | |
| Less than or equal to the quantities and values reported in part II for commercial U.S. shipments in each period? | |
| Explanation(s) for any boxes not checked: | |

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.

No.—Skip to question III-4.

PURCHASE COST DATA

| III-3. | <u>Imports for internal use, repackaging, or retail sale</u> —This question requests quarterly quantity and landed-duty paid value data for your firm's imports of the products defined above (at the beginning of question III-2 above) for internal consumption/repackaging/use for sales in your | | | | | |
|--------|---|--|--|--|--|--|
| | firm's retail locations from China and/or India since January 1, 2020. | | | | | |
| | During January 2021-December 2023, did your firm import any of the products listed on page 20 from China and/or India for internal consumption, repackaging, and/or use for sales in your firm's retail locations? | | | | | |
| | Yes.—Please complete the following tables as appropriate. | | | | | |

III-3a. <u>Imports for internal use, repackaging, or retail sale.</u>—Report below the import data¹ for pricing products² imported from China and used by your own firm or sold by your firm at retail.

Please note that values should be <u>landed</u>, <u>duty-paid</u> (<u>LDP</u>) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

China

Report data in 1,000s of pounds dry weight acid equivalent and actual dollars (not 1,000s).

| Pro | | oduct 1 Product 2 | | Product 3 | | Product 4 | | |
|--|-----------------------------------|------------------------------------|--------------------------------------|------------------------|----------|-----------|----------|-----------|
| Period of importation | Quantity | LDP Value | Quantity | LDP Value | Quantity | LDP Value | Quantity | LDP Value |
| 2021: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2022: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2023: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| ¹ LDP value (i.e., lande freight and insurance costs, values" definition in Part II ² Pricing product defin | , brokerage cha (Trade and Rel | arges, and impo ated Informatio | ort duties (i.e., on – Definition | all charges exc s). | | | | - |

| Note.—If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provid | e a |
|---|-----|
| description of your firm's product. Also, please explain any anomalies in your firm's reported data. | |

| Product 1: | | | |
|------------|--|--|--|
| Product 2: | | | |
| Product 3: | | | |
| Product 4: | | | |

III-3b. <u>Imports for internal use, repackaging, or retail sale.</u>—Report below the import data¹ for pricing products² imported from India and used by your own firm or sold by your firm at retail.

Please note that values should be <u>landed</u>, <u>duty-paid</u> (<u>LDP</u>) and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid by your firm (i.e., should be net of all returns, discounts, allowances, and rebates).

India

Report data in 1,000s of pounds dry weight acid equivalent and actual dollars (not 1,000s).

| | (Quanti | ty in 1 000s of | nounds dry we | piaht acid equi | ialent value i | n dollars\ | | |
|--|--|-------------------------------------|--------------------------------------|------------------------|----------------|------------|----------|-----------|
| | (Quantity in 1,000s of pounds dry weight acid equivalent, value in dollars) Product 1 Product 2 Product 3 Product 4 | | | | | uct 4 | | |
| Period of importation | Quantity | LDP Value | Quantity | LDP Value | Quantity | LDP Value | Quantity | LDP Value |
| 2021: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2022: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2023: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| ¹ LDP value (i.e., landed freight and insurance costs, values" definition in Part II (² Pricing product defini | brokerage cha Trade and Rel | arges, and impo ated Information | ort duties (i.e., on – Definition | all charges exc s). | | • | • • | ū |

| Note. —If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide | e a |
|--|-----|
| description of your firm's product. Also, please explain any anomalies in your firm's reported data. | |

| Product 1: |
|------------|
| Product 2: |
| Product 3: |
| Product 4: |

III-3c. <u>Purchase cost data checklist.</u>—Please check that the purchase cost data in question III-3(a) have been correctly reported.

| Are the purchase cost data reported above: | √ if Yes |
|--|----------|
| In actual dollars (<i>not</i> \$1,000) and actual 1,000s of pounds dry weight acid equivalent? | |
| Valued at landed duty-paid import value (i.e., value at the U.S. border after clearing Customs)? | |
| Reported only for imports used for internal consumption or for your firm's retail sale? | |
| Less than or equal to the quantities and values reported in part II for imports in each period? | |
| Explanation(s) for any boxes not checked: | |

Complete these questions only if your firm reported data in III-3a and/or III-3b, otherwise skip to question III-4.

The following questions ask about the costs/benefits (not included in the LDP values reported above) that factor into your firm's decision to import 2,4-D rather than purchase from a U.S. producer or importer of 2,4-D.

| III-3d. | Additional costs for your firm's imports of 2,4-D for your firm's internal use, repackaging, o | | | | | |
|---------|--|--|--|--|--|--|
| | retail sale.— | | | | | |

| | producer or importe | • | . 0,7 | | |
|------|---|---|---|--|--|
| iii. | estimate each cost (and the portion of e D, either directly or | in percent) compared to ach cost that was related ndirectly, and that are n | onal costs incurred by your firm and the cost of importing. (Only report costs to your firm's importing activities for 2,4-ot already included in the LDP value. Do when purchasing 2,4-D from a U.S. | | |
| ii. | compared to LDP va producer or importe activities, either dire include any costs th | ue) when importing 2,4- r. (Report only the portic ctly or indirectly, and no | onal cost incurred (as a percentage D rather than purchasing from a U.S. on that is related to your firm's importing t already included in the LDP value. Do NOT if your firm purchased the product from a perpared to LDP value. | | |
| i. | Did your firm incur any additional costs by importing 2,4-D rather than purchasing from a U.S. producer or importer (e.g., logistical or supply chain management costs, warehousing/inventory carrying costs, insurance or other risk management fees, demurrage fees, indirect and overseas costs)? No Yes—Please answer parts ii, iii, and iv. | | | | |
| | | | | | |

| Costs | value (percent) | Explanation |
|-------|-----------------|-------------|
| | % | |
| | % | |
| | % | |
| | % | |
| | | |

| iv. | Briefly describe how your firm's additional costs (beyond the purchase price) by importing 2,4-D directly compare with the additional costs your firm incurs when purchasing from a U.S. producer or U.S. importer. | | | | | |
|-----|---|--|--|--|--|--|
| | | | | | | |

| U.S. Importers | ' Questionnaire – | 2,4-D | (Preliminary |
|-----------------------|-------------------|-------|--------------|
|-----------------------|-------------------|-------|--------------|

| III-3e. | Decision basis. —To which source(s) does your firm compare costs in determining whether or |
|---------|---|
| | not to import 2,4-D? Check all that apply. |

| U.S. importers | U.S. producers | Neither U.S. importers nor U.S. producers |
|----------------|----------------|---|
| | | |

III-3f. Benefits of importing 2,4-D.

| i. | Briefly identify the benefits of importing 2,4-D instead of purchasing 2,4-D from a U.S. |
|----|--|
| | importer or from a U.S. producer. |

ii. Is it your firm's experience that the 2,4-D your firm imported from China and/or India are priced lower than they would be if your firm purchased from a U.S. importer or U.S. producer?

| Imports are priced lower when | No | Yes (If yes to either, please answer parts iii and iv.) |
|--|----|---|
| Not including the additional costs above | | |
| Including the additional costs above | | |

iii. Please estimate your firm's savings by importing 2,4-D instead of purchasing from a U.S. producer or U.S. importer since January 1, 2020 (as a percent of the purchase price from the U.S. importer or U.S. producer). For your estimate, compare the price of purchasing from a U.S. importer or U.S. producer to the cost of direct imports (including the additional costs described above in III-3b).

| Factors | Estimated savings (percent of purchase price from U.S. importer/producer) |
|---------------|---|
| U.S. producer | % |
| U.S. importer | % |

iv. What methods or experience did you base the estimates in III-3diii (i.e. based on previous transactions with U.S. producers and/or U.S. importers, market research, etc.) Check all that apply.

| Reported estimates in III-3diii based on | √ if Yes |
|--|----------|
| Previous company transactions | |
| Market research | |
| Other – Please explain | |

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of these data, as Commission staff may contact your firm regarding questions. 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.

For information requested in question III-4 through III-12, please report for commercial sales only.

| III-4. | Price setting. —How does your firm determine the prices that it charges for sales of 2,4-D (check |
|--------|--|
| | all that apply)? |

| Transaction by transaction | Contracts | Set price lists | Other | If other, describe |
|----------------------------------|-----------|-----------------------|-------|--------------------|
| | | | | |

III-5. <u>Discount policy.</u>—Please indicate and describe your firm's discount policies (*check all that apply*).

| Quantity discounts | Annual total volume discounts | No discount policy | Other | Describe |
|-----------------------|--|--------------------------|-------|----------|
| | | | | |

III-6. **Pricing terms.**—On what basis are your firm's prices of imported 2,4-D usually quoted *(check one)*?

| Delivered | F.o.b. | If f.o.b., specify point |
|-----------|--------|--------------------------|
| | | |

III-7. <u>Contract versus spot.</u>— Approximately what shares of your firm's sales of its 2,4-D from China and/or India in 2023 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

| | Type of sale | | | | | | | |
|---------------------|--|--|---|---|------------------------------------|---------|--|--|
| ltem | 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) | Total (shoul sum t 100.0% | ld o | | |
| Share of 2023 sales | % | % | % | % | 0.0 | % | | |

III-8. <u>Contract provisions.</u>—Please fill out the table regarding your firm's typical sales contracts for 2,4-D imported from China and/or India (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 | Yes | | | | | | |
| (during contract period) | No | | | | | | |
| | Quantity | | | | | | |
| Fixed quantity and/or price | Price | | | | | | |
| ,. , | Both | | | | | | |
| Indexed to raw | Yes | | | | | | |
| material costs ¹ | No | | | | | | |
| Not applicab | Not applicable | | | | | | |
| ¹ Please identify the indexes used: | | | | | | | |

III-9. <u>Lead times.</u>— What is your firm's share of sales of its 2,4-D imported from China and/or India from inventory and produced to order, and the typical lead time between a customer's order and the date of delivery for your firm's sales of its imported 2,4-D?

| Source | Share of 2023 sales | Lead time (Average number of days) |
|---------------------------------------|---------------------|--|
| From your firm's U.S. inventory | % | |
| From foreign manufacturers' inventory | % | |
| Produced to order | % | |
| Total (should sum to 100.0%) | 0.0 % | |

| II-10. | Shipping information.— | | | | | | | | | |
|--------|---|---|-----------|--|--|--|--|--|--|--|
| | (a) | Who generally arranges the transportation to your fir Your firm Purchaser (check one) | ocations? | | | | | | | |
| | (b) When your firm sells 2,4-D imported from China and/or India, from where is it sh Point of importation Storage facility (check one) | | | | | | | | | |
| | (c) | orted from China s U.S. point of | | | | | | | | |
| | | Distance from your firm's U.S. point of shipment | Share | | | | | | | |

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

III-11. <u>Geographical shipments.</u>—In which U.S. geographic market area(s) has your firm sold 2,4-D imported from subject countries since January 1, 2021 (check all that apply)?

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

| III-12. | <u>Inland trans</u> | portation costs. —What is the approximate percentage of the cost of 2,4-D |
|---------|---------------------|--|
| | imported fro | om China and/or India that is accounted for by U.S. inland transportation |
| | costs? | _ percent. |

III-14. **Substitutes.**—Can other products be substituted for 2,4-D?

III-13. <u>End uses.</u>—List the end uses of the 2,4-D that your firm imports. For each end-use product, what percentage of the <u>total cost</u> is accounted for by 2,4-D and other inputs?

| | Share of total cost | Total | |
|-----------------|---------------------|--------------|----------------|
| | | | (should sum to |
| End-use product | 2,4-D | Other inputs | 100.0% across) |
| | % | % | 0.0 % |
| | % | % | 0.0 % |
| | % | % | 0.0 % |

| | ☐ No | Yes—Please fill out the table. | | | | | | |
|----|------------|--------------------------------|----|-----|--|--|--|--|
| | | End use in which this | На | | nanges in the price of this substitute affected the price for 2,4-D? | | | |
| | Substitute | substitute is used | No | Yes | Explanation | | | |
| 1. | | | | | | | | |
| 2. | | | | | | | | |
| 3. | | | | | | | | |

III-15. <u>Demand trends</u>.— Has demand within the United States and outside of the United States (if known) for 2,4-D steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021? Explain any trends and describe the principal factors that have affected these changes in demand.

Select one box per row.

| Market | Steadily increase | Fluctuate up | No change | Fluctuate down | Steadily decrease | Explanation and factors |
|---------------------------|-------------------|-----------------|--------------|-------------------|----------------------|-------------------------|
| Within the United States | | | | | | |
| Outside the United States | | | | | | |

| U.S. Im | U.S. Importers' Questionnaire – 2,4-D (Preliminary) Page 35 | | | | | | | | |
|---------|---|---|------------------------------|-------------------|-------------------|--|--|--|--|
| III-16. | | _ | Have there b D since Janu | | _ | nges in the product range, product mix | | | |
| | No | Yes | If yes, pleas | se describe | | | | | |
| | | | | | | | | | |
| III-17. | 7. <u>Business cycles</u> .—Is the 2,4-D market subject to business cycles, either during the year or across years? If yes, describe. | | | | | | | | |
| | No | Yes | If yes, pleas | se describe | , including a | ny changes since January 1, 2021. | | | |
| | | | | | | | | | |
| III-18. | | - | | | - | t to conditions of competition distinctive previous question? If yes, describe. | | | |
| | No | Yes | If yes, pleas | se describe | , including a | ny changes since January 1, 2021. | | | |
| | | | | | | | | | |
| III-19. | time betwoorder entre than the q | upply constraints.—Has your firm refused, declined, or been unable to supply 2,4-D at any me between January 1, 2021 (examples include placing customers on allocation or "controlled rder entry," declining to accept new customers or renew existing customers, delivering less nan the quantity promised, being unable to meet timely shipment commitments, impact from hanges in operations listed in II-2a, etc.)? | | | | | | | |
| | No | Yes | If yes, pleas constraint. | se describe | , including t | ne reason, timing, and duration of the | | | |
| | | | | | | | | | |
| III-20. | | t changed, | , fluctuated | | | ly increased, fluctuated but ended adily decreased since January 1, 2021? | | | |
| | Steadily increase | Fluctuat | | Fluctuate down | Steadily decrease | Explain, noting how raw material price changes have affected your firm's selling prices for 2,4-D. | | | |
| | | | | | | | | | |

III-21. <u>Interchangeability.</u>—How often is 2,4-D 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 0 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
- 0 = no familiarity with products from a specified country-pair

| Country-pair | China | India | Other countries | |
|---------------|-------|-------|-----------------|--|
| United States | | | | |
| China | | | | |
| India | | | | |

For any country-pair producing 2,4-D that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of 2,4-D produced in the countries:

III-22. <u>Factors other than price</u>.—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between 2,4-D 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 0 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

0 = no familiarity with products from a specified country-pair

| Country-pair | China | India | Other countries | |
|---------------|-------|-------|-----------------|--|
| United States | | | | |
| China | | | | |
| India | | | | |

For any country-pair for which factors other than price are *always* or *frequently* a significant factor in your firm's sales of 2,4-D, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:

| III-23. | Role of section 301 tariffs. — Did the tariffs on Chinese-origin products under section 301, or |
|---------|--|
| | changes in these tariffs, have an impact on the 2,4-D market in the United States, including any |
| | effects on 2,4-D cost, price, supply, and/or demand, since January 1, 2021? |

| Yes | No | Don't know | |
|---|----|------------|--|
| | | | |
| If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts. | | | |

III-24 <u>Customer identification</u>.—List the names and contact information for your firm's 10 largest U.S. customers for 2,4-D since January 1, 2021. Indicate the share of the quantity of your firm's U.S. shipments of 2,4-D that each of these customers accounted for in 2023.

| Cı | ustomer's name | Contact person | Email | Telephone | City | State | Share of 2023 sales (%) |
|----|----------------|----------------|-------|-----------|------|-------|-------------------------------|
| 1 | | | | | | | |
| 2 | | | | | | | |
| 3 | | | | | | | |
| 4 | | | | | | | |
| 5 | | | | | | | |
| 6 | | | | | | | |
| 7 | | | | | | | |
| 8 | | | | | | | |
| 9 | | | | | | | |
| 10 | | | | | | | |

| III-25. | Other explanations.—If your firm would like to further explain a response to a question in Pa 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. | | | |
|---------|---|--|--|--|
| | | | | |

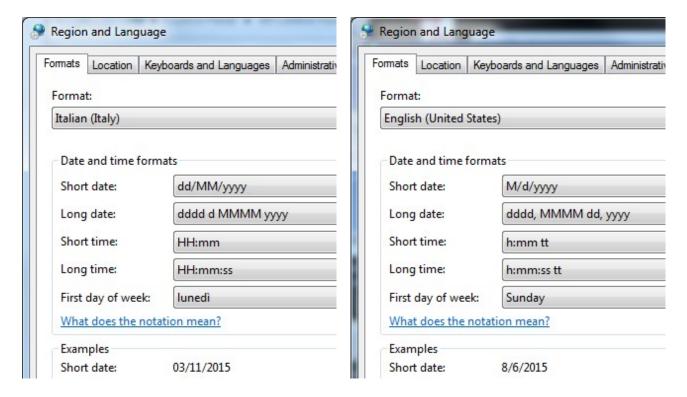
Correcting valid number error messages. —If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form fields. 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://ids.usitc.gov/case/8184/investigation/8537.

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 Commission's secure submission portal</u>.—The questionnaire must be uploaded in two formats: (1) a Microsoft Word 97-2003 document; and (2) a PDF copy of the complete questionnaire with a signature on the first page. Please include any attachments at the end of the PDF (e.g., APO certification, additional comments, etc.).

Web address: https://usitc.gov/qportal Pin: PLANT

• E-mail.—E-mail the MS Word questionnaire to Charles.Cummings@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.

<u>Parties to this proceeding</u>. —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).