

LOST SALES AND LOST REVENUE SURVEY

EPOXY RESINS FROM CHINA, INDIA, SOUTH KOREA, TAIWAN, AND THAILAND

This survey must be received by the Commission by **April 17, 2024**

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

The information called for in this survey is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning epoxy resins from China, India, South Korea, Taiwan, and Thailand (Inv. Nos. 701-TA-716-719 and 731-TA-1683-1687 (Preliminary)). The information requested in the survey 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 possession (19 U.S.C. § 1333(a)). Further information on this survey can be obtained from Craig Thomsen (202-205-3226, craig.thomsen@usitc.gov).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
Website _____

Has your firm purchased, or imported for its own use or retail sale, epoxy resins (as defined on next page) at any time since January 1, 2021?

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

Return questionnaire via the Commission's secure submission portal by clicking on the following link:
<https://www.usitc.gov/qportal> (PIN: **EPOXY**). See last page for detailed instructions.

CERTIFICATION

I certify that the information herein supplied in this survey 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 submitting this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this survey 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 investigation or other proceeding 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

GENERAL INFORMATION

Background.-- This proceeding was instituted in response to petitions filed on April 3, 2024, by the U.S. Epoxy Resin Producers *Ad Hoc* Coalition, which is comprised of Olin Corporation, Clayton, Missouri, and Westlake Corporation, Houston, Texas. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce ("Commerce") makes an affirmative determination of subsidization and/or dumping. Pertinent information to this proceeding are available at:

- Questionnaires: https://www.usitc.gov/reports/active_import_injury_questionnaires.
- Other information: <https://ids.usitc.gov/case/8190/investigation/8552>.

Epoxy resins covered by this proceeding are epoxy resins, also known as epoxide resins or polyepoxides, which are polymers or prepolymers containing epoxy groups. Epoxy resins range in physical form from low viscosity liquids to solids and are used in a wide range of applications such as coatings, paints, adhesives, composite materials, wind blade systems, insulating materials, civil engineering materials, and electronics. All epoxy resins are covered by the scope of these petitions irrespective of physical form, viscosity, grade, purity, molecular weight, or molecular structure and regardless of packaging.

Epoxy resins may contain modifiers or additives, such as hardeners, curatives, colorants, pigments, diluents, solvents, thickeners, fillers, plasticizers, softeners, flame retardants, toughening agents, catalysts, Bisphenol F, and ultraviolet light inhibitors, so long as the modifier or additive has not chemically reacted so as to cure the epoxy resin or convert it into a different product no longer containing epoxy groups. Such epoxy resins with modifiers or additives are included in the scope where the epoxy resin component comprises at least 30 percent of the total weight of the product. The scope also includes blends of epoxy resins with different types of epoxy resins, with or without the inclusion of modifiers and additives, so long as the combined epoxy resin component comprises at least 30 percent of the total weight of the blend.

Epoxy resins are characterized by the presence of reactive epoxy groups that allow them to be readily cross-linked at the time of use. Epoxy resins may be reacted (cross-linked) either with themselves or with a wide range of co-reactants, often referred to as hardeners, curatives, or curing agents. The cross-linking reaction is commonly referred to as curing. The epoxy resins and blends thereof covered by this scope have not been cured.

Epoxy resins that enter as part of a system or kit with separately packaged co-reactants, such as hardeners or curing agents, are within the scope. For such entries, both the epoxy resin and the co-reactant are covered by the scope of these petitions when entered together.

The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing, or removing modifiers or additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the subject country.

The scope also includes epoxy resin that is commingled with epoxy resin from sources not subject to this investigation. Only the subject component of such commingled products is covered by the scope of this investigations.

Excluded from the scope are phenoxy resins, which are polymers weighing more than 11,000 Daltons and containing no epoxy groups other than at the terminal ends of the molecule. Phenoxy resins' Melt

Flow Index ("MFI") at 200°C (392°F) range from 4 to 70 grams per 10 min and its Glass-Transition Temperatures ("Tg") range from 80 to 100°C (176 to 212°F).

Excluded from the scope are certain paint and coating products, which are blends, mixtures, or other formulations of epoxy resin, curing agent, and pigment, in any form, packaged in one or more containers, wherein (1) the pigment represents a minimum of 10 percent of the total weight of the product, (2) the epoxy resin represents a maximum of 80 percent of the total weight of the product, and (3) the curing agent represents 5 to 40 percent of the total weight of the product.

Excluded from the scope are preimpregnated fabrics or fibers, often referred to as "pre-pregs," which are composite materials consisting of fabrics or fibers (typically carbon or glass) impregnated with epoxy resin.

This merchandise is currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) statistical reporting number 3907.30.0000. Subject merchandise may also be imported under statistical reporting numbers 3907.29.0000, 3824.99.9397, 3214.10.0020, 2910.90.9100, 2910.90.9000, 2910.90.2000, and 1518.00.4000. The HTSUS subheadings are provided for convenience and customs purposes only; the written description of the scope is dispositive.

Reporting of information.-- If information is not readily available from your records, provide carefully prepared estimates.

Confidentiality.--The data furnished in response to this survey 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.

Release of information.--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit.

Contact information.--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

Firms operating more than one establishment should combine the data for all establishments into a single response.

PURCHASE INFORMATION

1. **Purchases and imports.**— Report separately your firm's domestic purchases and imports of epoxy resins.

"Purchase" – Purchase from a U.S. entity such as a U.S. producer, a U.S. importer, or other U.S. firm.

"Import" – Purchase directly from a foreign supplier and your firm is the importer of record.

Item	2021	2022	2023
	Quantity (in 1,000 pounds)		
Purchases of epoxy resins produced in—			
United States			
China			
India			
South Korea			
Taiwan			
Thailand			
All other countries ¹			
Sources unknown ²			
Total purchases	0	0	0
Imports of epoxy resins from—			
China			
India			
South Korea			
Taiwan			
Thailand			
All other countries ¹			
Total imports ³	0	0	0
¹ Please identify these countries: ² Please indicate the firm(s) from which you purchased this merchandise: ³ If your firm imported epoxy resins at any time since January 1, 2021, please also complete and return a U.S. importers' questionnaire in this proceeding.			

2. **Changes in purchasing patterns.**— Please indicate whether the shares of your firm’s purchases of epoxy resins steadily increased, fluctuated but ended higher, were constant, fluctuated but ended lower, or steadily decreased since January 1, 2021, from the listed sources.

3. Purchasing subject imports rather than domestic products.—

- (a) Since January 2021, did your firm import and/or purchase imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand instead of purchasing U.S.-produced epoxy resins? Respond for each subject country.

Source	Yes (also respond to parts (b) and (c))	No (If “No” for all countries, skip to next question)
China	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	<input type="checkbox"/>	<input type="checkbox"/>
Taiwan	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If you responded “Yes” to part (a), was the imported product priced lower than the domestic product?

Source	Yes	No
China	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	<input type="checkbox"/>	<input type="checkbox"/>
Taiwan	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>

- (c) If you responded “Yes” to part (a), was price a primary reason for importing and/or purchasing subject imports rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased and/or imported instead of domestic product since January 2021 (in 1,000 pounds)	No	If No, please indicate the reason your firm imported and/or purchased imports instead of domestic product
China	<input type="checkbox"/>		<input type="checkbox"/>	
India	<input type="checkbox"/>		<input type="checkbox"/>	
South Korea	<input type="checkbox"/>		<input type="checkbox"/>	
Taiwan	<input type="checkbox"/>		<input type="checkbox"/>	
Thailand	<input type="checkbox"/>		<input type="checkbox"/>	
If the quantity reported above exceeds the total quantity reported in II-1, please explain.				

4. **U.S. producers and import competition.**—

- (a) Since January 1, 2021, in connection with a sale or offer to sell epoxy resins to your firm, did U.S. producers reduce their prices of domestically produced epoxy resins in order to compete with lower-priced imports of epoxy resins from the subject countries? Respond for each subject country.

Source	Yes (also respond to question part (b))	No (If “No” for all countries, skip to next question)	Don’t know
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Taiwan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your firm responded “yes” to any of the above countries, please provide an estimate of the reduction in U.S. producers’ prices and any additional explanations.

Source	Estimated reduction in U.S. prices (percent)	Additional explanation, including such information as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors
China	%	
India	%	
South Korea	%	
Taiwan	%	
Thailand	%	

5. **Major purchasing factors.**—Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase epoxy resins.

1.	
2.	
3.	
Please list any other factors that are very important in your purchase decisions:	

6. **Kits containing epoxy resins**—Has your firm purchased and/or sold epoxy resins in kits that contain both the epoxy resin and the co-reactant since January 1, 2021? If so, what was the source of the epoxy resin that was contained in the kit?

Activity	No	Yes	Source (countries and firms)
Purchased	<input type="checkbox"/>	<input type="checkbox"/>	
Sold	<input type="checkbox"/>	<input type="checkbox"/>	

7. **Other explanations**--Please provide any additional comments in this box.

8. **Stock symbol information**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

9. **External counsel**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, having filed an entry of appearance, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

10. **Reporting requirements**--Please report the actual number of hours required and the cost to your firm of completing this survey for use by the Office of Management and Budget.

Hours	Dollars

Public reporting burden for this survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

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.

HOW TO FILE YOUR SURVEY RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at: https://www.usitc.gov/reports/active_import_injury_questionnaires.

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 Commission’s secure submission portal.**—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://www.usitc.gov/qportal>

Pin: EPOXY

- **E-mail.**—E-mail the MS Word questionnaire to craig.thomsen@usitc.gov; include a PDF copy of the complete questionnaire with a signature on the first page. 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 submission portal 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 purchase this product, please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission’s secure submission portal or email.