

## U.S. IMPORTERS' QUESTIONNAIRE

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

This questionnaire must be received by the Commission by **January 21, 2025**

*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 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_

Has your firm imported 2,4-D (as defined on the next page) from any country at any time since January 1, 2021?

☐ **NO** (Sign the certification below and promptly return **only** this page of the questionnaire to the Commission)

☐ **YES** (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

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

#### CERTIFICATION

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

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

**PART I.—GENERAL INFORMATION**

**Background.** —This proceeding was instituted in response to petitions filed on March 14, 2024, by Corteva Agriscience LLC (Indianapolis, Indiana). Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce (“Commerce”) makes an affirmative determination of subsidization and/or dumping. Questionnaires and other information pertinent to this proceeding are available at:

Questionnaires: [https://usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://usitc.gov/reports/active_import_injury_questionnaires).

Other case information: <https://ids.usitc.gov/case/8184/investigation/8599>.

**2,4-D** is 2,4-dichlorophenoxyacetic acid (2,4-D) and its derivative products, including salt and ester forms of 2,4-D. 2,4-D has the Chemical Abstracts Service (CAS) registry number of 94-75-7 and the chemical formula  $C_8H_6Cl_2O_3$ .

Salt and ester forms of 2,4-D include 2,4-D sodium 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 tri-isopropanolamine salt (CAS 3234180-3), 2,4-D choline salt (CAS 1048373-72-3), 2,4-D butoxyethyl ester (CAS 1929-733), 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 salt and ester forms of 2,4-D, is covered by the scope irrespective of purity, particle size, or physical form.

The conversion of a 2,4-D salt or ester from 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 investigations. Formulations of 2,4-D are products that are registered for end-use applications with the Environmental Protection Agency and contain a dispersion agent.

For purposes of this questionnaire, the country of origin of any 2,4-D derivative salt or ester is determined by the country in which the underlying 2,4-D acid is produced. 2,4-D, its salts, and its esters are classified under Harmonized Tariff Schedule of the United States (HTSUS) subheading 2918.99.2010. Subject merchandise, including the abovementioned formulations, may also be classified under HTSUS 2922.12.0001, 2921.11.0000, 2921.19.6195, 2922.19.9690, 3808.93.0500, and 3808.93.1500. The HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes. The written description of the scope of the investigation is dispositive.

**2,4-D acid** is 2,4-dichlorophenoxyacetic acid (2,4-D) and has the Chemical Abstracts Service (CAS) registry number of 94-75-7 and the chemical formula  $C_8H_6Cl_2O_3$ .

**2,4-D salts** are 2,4-D derivative products where the 2,4-D acid has been converted into one of the following salt forms:

- 2,4-D sodium 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 tri-isopropanolamine salt (CAS 3234180-3); or
- 2,4-D choline salt (CAS 1048373-72-3).

**2,4-D esters** are 2,4-D derivative products where the 2,4-D acid has been converted into one of the following ester forms:

- 2,4- D butoxyethyl ester (CAS 1929-733);
- 2,4-D 2- ethylhexylester (CAS 1928-43-4); or
- 2,4-D isopropylester (CAS 94-11-1).

**2,4-D converted forms** are 2,4-D in both derivative (non-acid) forms defined above: i.e., 2,4-D salts and 2,4-D esters combined.

**Importer.** —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.

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

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

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

**Valid number error messages.** —If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Charles Cummings (202-708-1666, [Charles.Cummings@usitc.gov](mailto:Charles.Cummings@usitc.gov)).

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

- I-1. **Reporting requirements.** —Please report below the actual number of hours required and the cost to your firm of completing this questionnaire for use by the Office of Management and Budget.

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](mailto:import_injury@usitc.gov).

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

**“Establishment”**—Each facility of a firm involved in the importation of 2,4-D, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

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

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

Law firm:	
Lead attorney(s):	

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

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

Firm name	Country	Extent of ownership (percent)

[illegible]

- 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.

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

- I-7. **Consignee.** —If your firm is an importer of record of 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. **FTZ or bonded warehouses.** —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	<input type="checkbox"/>	<input type="checkbox"/>	
Bonded warehouses	<input type="checkbox"/>	<input type="checkbox"/>	

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

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

**PART II. —TRADE AND RELATED INFORMATION**

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

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

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.** —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.
<input type="checkbox"/>	<input type="checkbox"/>	

- 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.
<input type="checkbox"/>	<input type="checkbox"/>	



- II-3a. **Arranged imports.** —Has your firm imported or arranged for the importation of 2,4-D for delivery after September 30, 2024?

**“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.

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

Source	Period			
	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Jul-Sep 2025
	Quantity (in 1,000 pounds dry weight acid equivalent)			
U.S. imports from: China				
India				
All other sources				

- II-3b. **Imports in the 12-month period preceding the petition.** — 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)

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

Source	March 2023 through February 2024	
	Primary HTS number 2918.99.2010	All other HTS numbers
	Quantity (in 1,000 pounds dry weight acid equivalent)	
U.S. imports from: China		
India		
All other sources		

- II-4. **Reasons for importing if producer.** —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.

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**Definitions**

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

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

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

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

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

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

**“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.S. imports from China: 2,4-D.** –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. As noted on page 2, the country of origin of any 2,4-D derivative salt or ester is determined by the country in which the underlying 2,4-D acid is produced.

## China

Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports of 2,4-D under:<sup>1</sup></b>					
<b>Primary HTS number</b>					
<b>2918.99.2010</b>					
Quantity (B)					
Value (C)					
<b>All other HTS numbers:<sup>2</sup></b>					
Quantity (D)					
Value (E)					
<b>U.S. shipments of 2,4-D:</b>					
<b>Commercial shipments:</b>					
Quantity (F)					
Value (G)					
<b>Internal consumption:<sup>3</sup></b>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:<sup>3</sup></b>					
Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments of 2,4-D:<sup>4</sup></b>					
Quantity (L)					
Value (M)					
<b>End-of-period inventories:</b> (quantity) (N)					
<p><sup>1</sup> Please identify the foreign producers, if known: ____.</p> <p><sup>2</sup> Please identify the other HTS statistical reporting numbers used to classify those imports: ____.</p> <p><sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p><sup>4</sup> Identify your firm's principal export markets: ____.</p>					

II-5a. **U.S. imports from China: 2,4-D. –Continued**

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.** —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.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-5b. **Channels of distribution of 2,4-D: 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

Quantity (in 1,000 pounds dry weight acid equivalent)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments of 2,4-D to:</b>					
Converters/ formulators (O) <sup>1</sup>					
Distributors (P)					
End users (Q)					
<sup>1</sup> If your firm mixes in-scope 2,4-D with out-of-scope products within proprietary or other formulations, please ensure those were labeled as internal consumption in part a of this question and are included in this line in this grid.					

**RECONCILIATION OF CHANNELS.** —Please ensure that the quantities reported for channels of distribution (i.e., lines O through Q) in each time period equal the quantity reported for U.S. shipments (i.e., lines 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.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
O + P + Q - F - H - J = zero ("0"), if not revise.	0	0	0	0	0

II-5c. **U.S. imports by form: China** — Report your firm's U.S. imports from China by chemical form during the specified periods.

Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000s)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>U.S. imports. —</b>					
2,4-D acid:					
Quantity (R)					
Value (S)					
2,4-D salt:					
Quantity (T)					
Value (U)					
2,4-D ester:					
Quantity (V)					
Value (W)					

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.** — Please ensure that the data reported for U.S. shipments by type (i.e., lines R through W) equal the data reported for U.S. imports (i.e., lines B through E) in part a of this question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> $R + T + V - B - D =$ should equal zero ("0")	0	0	0	0	0
<b>Value:</b> $S + U + W - C - E =$ should equal zero ("0")	0	0	0	0	0

- II-6a. **U.S. imports from India: 2,4-D.** –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. As noted on page 2, the country of origin of any 2,4-D derivative salt or ester is determined by the country in which the underlying 2,4-D acid is produced.

## India

Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports of 2,4-D under:<sup>1</sup></b>					
<b>Primary HTS number</b>					
<b>2918.99.2010</b>					
Quantity (B)					
Value (C)					
<b>All other HTS numbers:<sup>2</sup></b>					
Quantity (D)					
Value (E)					
<b>U.S. shipments of 2,4-D:</b>					
<b>Commercial shipments:</b>					
Quantity (F)					
Value (G)					
<b>Internal consumption:<sup>3</sup></b>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:<sup>3</sup></b>					
Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments of 2,4-D:<sup>4</sup></b>					
Quantity (L)					
Value (M)					
<b>End-of-period inventories:</b> (quantity) (N)					
<p><sup>1</sup> Please identify the foreign producers, if known: _____.</p> <p><sup>2</sup> Please identify the other HTS statistical reporting numbers used to classify those imports: _____.</p> <p><sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.</p> <p><sup>4</sup> Identify your firm's principal export markets: _____.</p>					

II-6a. **U.S. imports from India: 2,4-D. –Continued**

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.** —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.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-6b. **Channels of distribution of 2,4-D: India.** —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

Quantity (in 1,000 pounds dry weight acid equivalent)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments of 2,4-D to:</b>					
Converters / formulators (O) <sup>1</sup>					
Distributors (P)					
End users (Q)					
<sup>1</sup> If your firm mixes in-scope 2,4-D with out-of-scope products within proprietary or other formulations, please ensure those were labeled as internal consumption in part a of this question and are included in this line in this grid.					

**RECONCILIATION OF CHANNELS.** —Please ensure that the quantities reported for channels of distribution (i.e., lines O through Q) in each time period equal the quantity reported for U.S. shipments (i.e., lines 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.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
O + P + Q F- H - J = zero ("0"), if not revise.	0	0	0	0	0

II-6c. **U.S. imports by form: India** —Report your firm's U.S. imports from India by chemical form during the specified periods.

Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>U.S. imports. —</b>					
2,4-D acid:					
Quantity (R)					
Value (S)					
2,4-D salt:					
Quantity (T)					
Value (U)					
2,4-D ester:					
Quantity (V)					
Value (W)					

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.** —Please ensure that the data reported for U.S. shipments by type (i.e., lines R through W) equal the data reported for U.S. imports (i.e., lines B through E) in part a of this question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> $R + T + V - B - D =$ should equal zero ("0")	0	0	0	0	0
<b>Value:</b> $S + U + W - C - E =$ should equal zero ("0")	0	0	0	0	0



- II-7a. **U.S. imports from all other sources: 2,4-D.** –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 or India) by your firm during the specified periods. As noted on page 2, the country of origin of any 2,4-D derivative salt or ester is determined by the country in which the underlying 2,4-D acid is produced.

## All other sources

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

Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Beginning-of-period inventories</b> (quantity) (A)					
<b>Imports of 2,4-D under:<sup>1</sup></b> <b>Primary HTS number</b> <b>2918.99.2010</b> Quantity (B)					
Value (C)					
<b>All other HTS numbers:<sup>2</sup></b> Quantity (D)					
Value (E)					
<b>U.S. shipments of 2,4-D:</b> <b>Commercial shipments:</b> Quantity (F)					
Value (G)					
<b>Internal consumption:<sup>3</sup></b> Quantity (H)					
Value <sup>2</sup> (I)					
<b>Transfers to related firms:<sup>3</sup></b> Quantity (J)					
Value <sup>2</sup> (K)					
<b>Export shipments of 2,4-D:<sup>4</sup></b> Quantity (L)					
Value (M)					
<b>End-of-period inventories:</b> (quantity) (N)					

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

<sup>2</sup> Please identify the other HTS statistical reporting numbers used to classify those imports: \_\_\_\_\_.

<sup>3</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>4</sup> Identify your firm's principal export markets: \_\_\_\_\_.

II-7a. **U.S. imports from all other sources: 2,4-D. –Continued**

**RECONCILIATION OF SHIPMENTS, IMPORTS, AND INVENTORIES.** —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.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
A + B + D – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

II-7b. **Channels of distribution of 2,4-D: All other sources.** —Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of imports from all other sources by channel of distribution during the specified periods.

## All other sources

Quantity (in 1,000 pounds dry weight acid equivalent)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments of 2,4-D to:</b>					
Converters / formulators (O) <sup>1</sup>					
Distributors (P)					
End users (Q)					
<sup>1</sup> If your firm mixes in-scope 2,4-D with out-of-scope products within proprietary or other formulations, please ensure those were labeled as internal consumption in part a of this question and are included in this line in this grid.					

**RECONCILIATION OF CHANNELS.** —Please ensure that the quantities reported for channels of distribution (i.e., lines O through Q) in each time period equal the quantity reported for U.S. shipments (i.e., lines 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.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
O + P + Q - F - H - J = zero ("0"), if not revise.	0	0	0	0	0

II-7c. **U.S. imports by form: All other sources** —Report your firm's U.S. imports from all other sources (e.g., sources other than China or India) by chemical form during the specified periods.

Quantity (in 1,000 pounds dry weight acid equivalent), value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>U.S. shipments. —</b>					
2,4-D acid:					
Quantity (R)					
Value (S)					
2,4-D salt:					
Quantity (T)					
Value (U)					
2,4-D ester:					
Quantity (V)					
Value (W)					

**RECONCILIATION OF U.S. SHIPMENTS BY TYPE.** —Please ensure that the data reported for U.S. shipments by type (i.e., lines R through W) equal the data reported for U.S. imports (i.e., lines B through E) in part a of this question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> $R + T + V - B - D =$ should equal zero ("0")	0	0	0	0	0
<b>Value:</b> $S + U + W - C - E =$ should equal zero ("0")	0	0	0	0	0

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

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- II-9. **Country of origin.** — Per the instructions, were there any instances where you firm classified its imports based on a country of origin that differs from what was reported to U.S. Customs and Border Protection (“CBP”) (i.e., imported a 2,4-D salt and reported that as country of origin based where the acid was converted to salt form but have as instructed reported it based on a different country or origin based on where the acid was manufactured)?

No (all the same country of origin classification).	Yes (some portion based on a different country of origin classification).
<input type="checkbox"/>	<input type="checkbox"/>

If yes, please indicate what share of U.S. imports by source so reclassified in this questionnaire and indicate the country of conversion.

Item	Share in calendar year 2023 (percent)	Indicate the country of origin reported for Customs purposes (i.e., last substantial transformation)
Share of U.S. imports where the country-of-origin classification reported in this questionnaire (per instructions) differs from the country-of-origin reported to CBP: China data in II-5a		
India data in II-6a		
All other sources in II-7a		

- II-10. **Conversion operations.** —Since January 1, 2021, has your firm engaged in conversion operations on imported 2,4-D?

**“Conversion operations”** – Your firm imported in-scope 2,4-D, and then converted those already in-scope 2,4-D products into another form of in-scope product (e.g., imported in-scope 2,4-D acid, converted that imported in-scope 2,4-D acid into in-scope 2,4-D salts and/or esters). Your firm may or may not then perform additional domestic activities that process its converted 2,4-D into downstream out-of-scope formulations.

<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	If yes— <b><u>COMPLETE AND RETURN A U.S. PRODUCERS' QUESTIONNAIRE</u></b>

- II-11. **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.

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

Further information on this part of the questionnaire can be obtained from Pamela Davis (202-205-2218; [Pamela.Davis@usitc.gov](mailto:Pamela.Davis@usitc.gov)).

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

Name	
Title	
Email	
Telephone	

**PRICE DATA**

- III-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 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 choline salt, Form: any

**Product 3.**— 2,4-D non-choline salt, Form: any

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

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

- III-2a. During January 2021-September 2024, did your firm import from China and/or India and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

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

- III-2b. **Price data.**—Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> imported from China and sold by your firm, in the same form it was imported (i.e., excluding domestic converted salts and esters using imported 2,4-D acid).

## China

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

(Quantity in 1,000 pounds dry weight acid equivalent, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								
April-June								
July-September								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:

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

## India

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

(Quantity in 1,000 pounds dry weight acid equivalent, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								
April-June								
July-September								

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

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

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

Product 1:

Product 2:

Product 3:

Product 4:



III-2d. **Price data checklist.**—Please check that the pricing data in questions III-2b and III-2c have been correctly reported.

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000s) and actual 1,000 pounds dry weight acid equivalent?	<input type="checkbox"/>
Valued f.o.b. U.S. point of shipment (i.e., exclude U.S. inland transportation costs)?	<input type="checkbox"/>
Reported net of all discounts, rebates, “loyalty” payments to distributors, and returns (deducted from the quarter in which the original sale occurred)?	<input type="checkbox"/>
Reported for commercial U.S. shipments only (i.e., exclude internal consumption, transfers, and exports)?	<input type="checkbox"/>
Less than or equal to the quantities and values reported in part II for commercial U.S. shipments in each period?	<input type="checkbox"/>
Reported in the same product form in which it was imported? (i.e., excluding domestic converted salts and esters using imported 2,4-D acid)	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

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

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

**PURCHASE COST DATA**

- III-3. **Imports for internal use**—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 from China and/or India since January 1, 2021.

Purchase cost data should be classified in the product form in which it was imported (e.g., if your firm imported 2,4-D acid in solid form for conversion into a salt or ester form for commercial sale or downstream formulation, this would be classified as purchase cost data for Product 1).

During January 2021-September 2024, did your firm import any of the products listed on page 23 from China and/or India for internal consumption?

<input type="checkbox"/>	<b>Yes.</b> —Please complete the following tables as appropriate.
<input type="checkbox"/>	<b>No.</b> —Skip to question III-4.

III-3a. **Imports for internal use.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from China and used by your own firm.

Please note that values should be **landed, duty-paid (LDP)** 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).

(Quantity in 1,000s of pounds dry weight acid equivalent, value in dollars)								
Period of importation	Product 1		Product 2		Product 3		Product 4	
	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								
April-June								
July-September								

<sup>1</sup> LDP value (i.e., landed duty-paid 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). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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

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

Product 1:

Product 2:

Product 3:

Product 4:

III-3b. **Imports for internal use.**—Report below the import data<sup>1</sup> for pricing products<sup>2</sup> imported from India and used by your own firm.

Please note that values should be **landed, duty-paid (LDP)** 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).

(Quantity in 1,000s of pounds dry weight acid equivalent, value in dollars)								
Period of importation	Product 1		Product 2		Product 3		Product 4	
	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value	Quantity	LDP Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								
April-June								
July-September								

<sup>1</sup> LDP value (i.e., landed duty-paid 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). See "Import values" definition in Part II (Trade and Related Information – Definitions).

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

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

Product 1:

Product 2:

Product 3:

Product 4:

III-3c. **Purchase cost data checklist.**—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 ( <b>not</b> \$1,000) and actual 1,000s of pounds dry weight acid equivalent?	<input type="checkbox"/>
Valued at landed duty-paid import value (i.e., value at the U.S. border after clearing Customs)?	<input type="checkbox"/>
Reported only for imports used for internal consumption or for your firm's retail sale?	<input type="checkbox"/>
Less than or equal to the quantities and values reported in part II for imports in each period?	<input type="checkbox"/>
Reported in the same product form in which it was imported? (i.e., excluding domestic converted salts and esters using imported 2,4-D acid)	<input type="checkbox"/>
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, or retail sale.—**

- 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.
- ii. Please provide an estimate of the total additional cost incurred (as a percentage compared to LDP value) when importing 2,4-D rather than purchasing from a U.S. producer or importer. (Report only the portion that is related to your firm's importing activities, either directly or indirectly, and not already included in the LDP value. Do NOT include any costs that also would be incurred if your firm purchased the product from a U.S. producer or importer.) \_\_\_\_\_ percent compared to LDP value.
- iii. Please identify and explain the specific additional costs incurred by your firm and estimate each cost (in percent) compared to the cost of importing. (Only report costs and the portion of each cost that was related to your firm's importing activities for 2,4-D, either directly or indirectly, and that are not already included in the LDP value. Do NOT report costs that your firm would incur when purchasing 2,4-D from a U.S. producer or importer.)

Costs	Estimated percentage compared to LDP 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.

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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 and/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	<input type="checkbox"/>	<input type="checkbox"/>
Including the additional costs above	<input type="checkbox"/>	<input type="checkbox"/>

- 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, 2021 (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	<input type="checkbox"/>
Market research	<input type="checkbox"/>
Other – Please explain	<input type="checkbox"/>

*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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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

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

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

III-7. **Contract versus spot.**— 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?

Item	Type of sale				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	
Share of 2023 sales	%	%	%	%	0.0 %



- III-8. **Contract provisions.**—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 (during contract period)	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	Quantity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs <sup>1</sup>	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Please identify the indexes used: _____.				

- III-9. **Lead times.**— What share of your firm's sales of its 2,4-D imported from China and/or India was from inventory and produced to order, and what was 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	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

III-10. **Shipping information.**—

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm   ☐ Purchaser (*check one*)
- (b) When your firm sells 2,4-D imported from China and/or India, from where is it shipped?  
☐ Point of importation   ☐ Storage facility (*check one*)
- (c) Indicate the approximate percentage of your firm's sales of 2,4-D imported from China and/or India that are delivered the following distances from your firm's U.S. point of shipment.

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

- III-11. **Geographical shipments.**—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
<b>Northeast.</b> —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Midwest.</b> —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Southeast.</b> —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Central Southwest.</b> —AR, LA, OK, and TX.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Mountains.</b> —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pacific Coast.</b> —CA, OR, and WA.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Other.</b> —All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>	<input type="checkbox"/>

- III-12. **Inland transportation costs.**—What is the approximate percentage of the cost of 2,4-D imported from China and/or India that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent.

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

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

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

☐ No

☐ Yes—Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for 2,4-D?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Demand trends.**— 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-16. **Product changes.**—Have there been any significant changes in the product range, product mix or marketing of 2,4-D since January 1, 2021?

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

- III-17. **Business cycles.**—Is the 2,4-D market subject to business cycles, either during the year or across years? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-18. **Conditions of competition.**—Is the 2,4-D market subject to conditions of competition distinctive to 2,4-D other than the business cycles described in the previous question? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

**III-19. Supply constraints.—**

- (a) Has your firm refused, declined, or been unable to supply 2,4-D at any time since January 1, 2021 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

No (skip to III-20)	Yes (respond to part b)
<input type="checkbox"/>	<input type="checkbox"/>

- (b) For each year that your firm faced supply constraints, check yes and describe the constraints with the details requested below.

Check if yes	Period	Description: include the timing, duration, and reason for the constraint.
<input type="checkbox"/>	2021	
<input type="checkbox"/>	2022	
<input type="checkbox"/>	2023	
<input type="checkbox"/>	January 1- March 14, 2024	
<input type="checkbox"/>	Since March 14, 2024	

- III-20. **EPA regulation.**—Does EPA regulation on the use or importation of 2,4-D limit entrance or participation in the U.S. 2,4-D market?

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

- III-21. **Patent protections.**—Do patent protections on the production use, or importation of 2,4-D limit entrance or participation in the U.S. 2, 4-D market?

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

- III-22. **Raw materials.**— Have 2,4-D raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021?

Select one box per row.

Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for 2,4-D.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- III-23. **Interchangeability.**—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 O in the table below:

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

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	India	Other countries
United States			
China			
India			
For any country-pair producing 2,4-D that is <i>sometimes</i> or <i>never</i> 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-24. **Factors other than price.**—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 O in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

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

Country-pair	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-25. **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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts.

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- III-26. **Customer identification.**—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.

	Customer's name	City	State	Share of 2023 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

- III-27. **Other explanations.**—If your firm would like to further explain a response to a question in Part III for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

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**PART IV.—SEMI-FINISHED PRODUCTION ANALYSIS**

Further information on this part of the questionnaire can be obtained from Charles Cummings (202-708-1666, [Charles.Cummings@usitc.gov](mailto:Charles.Cummings@usitc.gov)).

- IV-1. **Semi-finished product analysis.** —Please answer the following questions regarding the differences and similarities in 2,4-D acid and 2,4-D salts and/or esters in this proceeding as defined below:

**2,4-D acid** is 2,4-dichlorophenoxyacetic acid (2,4-D) and has the Chemical Abstracts Service (CAS) registry number of 94-75-7 and the chemical formula  $C_8H_6Cl_2O_3$ .

**2,4-D salts** are 2,4-D derivative products where the 2,4-D acid has been converted into one of the following salt forms:

- 2,4-D sodium 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 tri-isopropanolamine salt (CAS 3234180-3); or
- 2,4-D choline salt (CAS 1048373-72-3).

**2,4-D esters** are 2,4-D derivative products where the 2,4-D acid has been converted into one of the following ester forms:

- 2,4- D butoxyethyl ester (CAS 1929-733);
- 2,4-D 2- ethylhexylester (CAS 1928-43-4); or
- 2,4-D isopropylester (CAS 94-11-1).

- (i) Are there uses for 2,4-D acid other than for the production of 2,4-D salts and/or esters?

No	Yes	If yes--Please describe these uses.
<input type="checkbox"/>	<input type="checkbox"/>	

- (ii) Is the market for 2,4-D acid separate and distinct from the market for 2,4-D salts and/or esters?

No	Yes	If yes--Please describe how they are separate and distinct.
<input type="checkbox"/>	<input type="checkbox"/>	

- (iii) Are there differences in the physical characteristics and functions of 2,4-D acid and 2,4-D salt and/or esters?

No	Yes	If yes--Please describe these differences.
<input type="checkbox"/>	<input type="checkbox"/>	

- (iv) Is there a significant difference in the cost or value between 2,4-D acid and 2,4-D salt and/or esters?

No	Yes	If yes--Please describe these differences.
<input type="checkbox"/>	<input type="checkbox"/>	

- (v) Would you describe the processes used to transform the 2,4-D acid into 2,4-D salt and/or esters as significant and particularly labor or capital intensive?

No	Yes	If yes--Please describe the labor or capital intensively of the conversion process.
<input type="checkbox"/>	<input type="checkbox"/>	

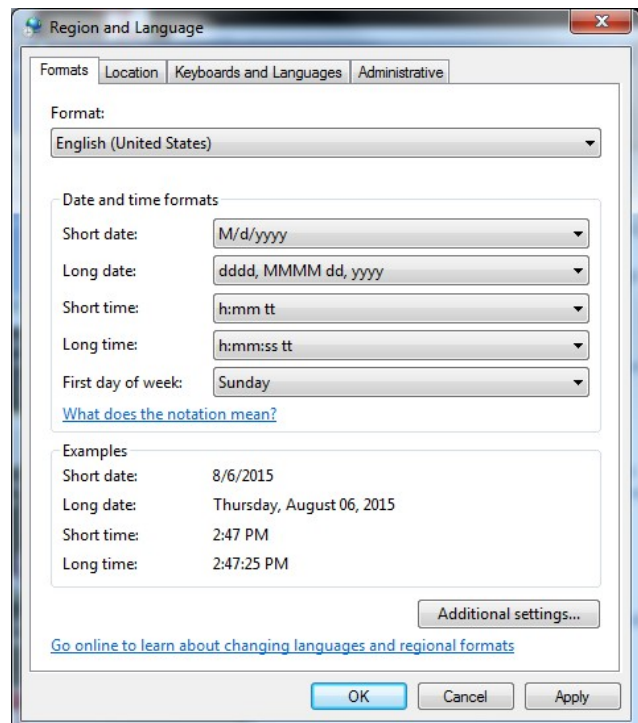
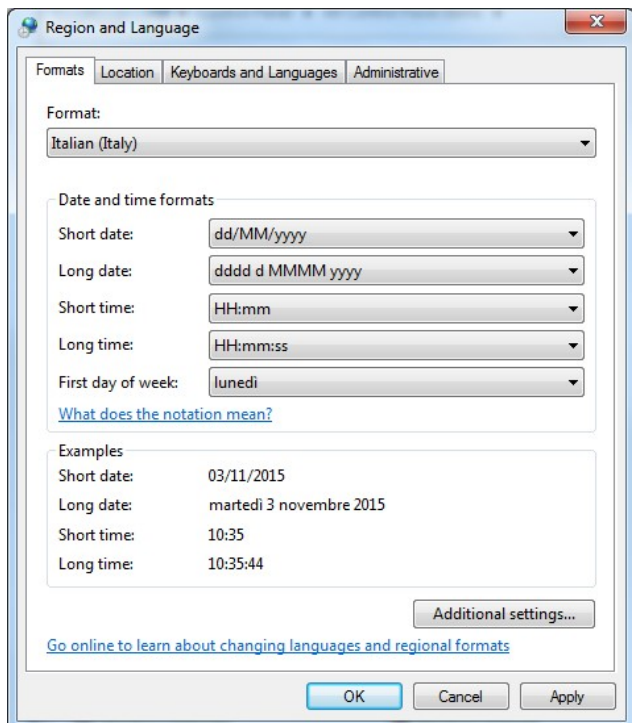
**Correcting valid number error messages.** —If you are completing this questionnaire in a country that uses periods (“.”) to delineate multiples of 1000 (i.e., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in the numeric form 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://usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://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://usitc.gov/qportal>      **Pin:** PLANT      **Phase:** Final

• **E-mail.** —*E-mail the MS Word questionnaire to [Charles.Cummings@usitc.gov](mailto:Charles.Cummings@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 import this product,** please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission’s secure submission portal or email.

**Parties to this proceeding.** —If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.