FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

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

This questionnaire must be received by the Commission by <u>January 21, 2025</u>
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 or 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.

Name of firm

Address				
Website				
Has your firm January 1, 202	•	as defined on next page) a	at any time from China and/or India since	
☐ NO	(Sign the certification below and	d promptly return only this p	page of the questionnaire to the Commission)	
☐ YES	(Complete all parts of the quest	ionnaire, and return the ent	cire questionnaire to the Commission)	
Data reporte	d in this questionnaire relat	te to (Check one):		
	☐ CHINA	☐ INDIA		
		CERTIFICATION		ä
nowledge and belief ar neans of this certificat nformation provided in	nd understand that the inforn ion I also grant consent for	nation submitted is subjection the Commission, and i	nnaire is complete and correct to the besect to audit and verification by the Commisits employees and contract personnel, to any other import-injury proceedings conditions.	sion. By use the
proceeding or other propersonnel (a) for developersonnel (a) for developersonnel (a) for developersonnel (a) for (ii) by U.S.	ceedings may be disclosed to ping or maintaining the reco ns relating to the programs,	o and used: (i) by the Co rds of this or a related p personnel, and operat I contract personnel, solo	o this request for information and through ommission, its employees and Offices, and proceeding, or (b) in internal investigations tions of the Commission including under ely for cybersecurity purposes. I understand	contract , audits, 5 U.S.C.
Name of Authorized Offic	cial Title of Authoria	zed 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. Other case information: https://ids.usitc.gov/case/8184/investigation/8599.

<u>2,4-D</u> 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.

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, purchaser and/or foreign producer questionnaire), you need not respond to duplicated questions.

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 Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as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

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

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

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

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 30 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.

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

"Establishment"—Each facility of a firm in China or India involved in the production or export of
2,4-D, including auxiliary facilities operated in conjunction with (whether or not physically
separate from) such facilities. Firms operating more than one establishment in China or India
should combine the data for all establishments into a single report.

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

I-3. Related producers. —Does your firm or any related firm produce, have the capability to produce, or have any plans to produce 2,4-D in the United States or other countries?

No	Yes	If yes, please name the firm(s) and country(ies) below and, if U.S. producer(s), ensure that they complete the Commission's producer questionnaire.

I-4. Related U.S. importers. —Does your firm or any related firm import or have any plans to import 2,4-D into the United States?

No	If yes, please name the firm(s) below and ensure that they complete the Commission's importer questionnaire.

I-5.	<u>Stock symbol information.</u> — If your firm or any of the entities reported in questions I-2
	through I-4 are publicly traded in the United States, please specify the stock exchange and
	trading symbol (including American Depository Receipts, if applicable):

I-6. <u>External counsel.</u> — 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-7. <u>U.S. importers</u>. —Please provide the names, contacts, telephone numbers, and e-mail addresses of the <u>TEN</u> largest U.S. importers of your firm's 2,4-D since January 1, 2021.

	Importer's name	Contact person	Email	Telephone	Share of your firm's 2023 U.S. exports (%)
1					
2				H	
3					
4					
5					
6					
7					
8					
9					
10					

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). Supply all data requested on a calendar-year basis.

II-1.		nation. —Please identify the responsible aff may contact that individual regarding	le individual and the manner by which ng the confidential information submitted
	Name		
	Title		
	Email		
	Telephone		

II-2a. <u>Changes in operations.</u> —Please indicate whether your firm has experienced any of the following changes in relation to the production of 2,4-D since January 1, 2021.

		If checked, please describe the nature, timing / duration, and impact on operations of any such reported changes as well as the business reasons for them; leave completely blank if not applicable
	Plant openings	
	Plant closings	
	Prolonged shutdowns	
	Production curtailments	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Weather-related or force majeure events	
	Other (e.g., revised labor agreements, technology)	

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, production, and shipments (including exports to the United States) 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	If yes, describe these changes including the impact over time on the (a) supply chain and (b) production and shipments with respect to 2,4-D.

II-2c. Anticipated changes in operations. —Does your firm anticipate any changes in the character of its operations or organization (as noted above) relating to the production of 2,4-D in the future?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for them.

II-3a. **Production using same machinery.**—Please report your firm's production of products using the same equipment, machinery, or employees as used to produce 2,4-D, and the combined capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

"Installed overall capacity" – The level of production that your establishment(s) could have attained, assuming your firm's optimal product mix, and based solely on existing capital investments, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does <u>not</u> take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity.

"Practical overall capacity" – The level of production that your establishment(s) could reasonably have expected to attain, taking into account your firm's actual product mix over the period. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate; but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) your firm's existing in place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited your firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production your firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

"Practical 2,4-D capacity" – The level of production of 2,4-D that your establishment(s) could reasonably have expected to attain. The same assumptions apply to this capacity measure as for practical overall capacity, but only includes the portion of practical overall capacity allocated to the production of 2,4-D based on the actual product mix experienced over the period.

"Production" – All production in your establishment(s) in China or India, including production consumed internally within your firm and production for another firm under a toll agreement.

Takes into account	Installed overall capacity	Practical overall capacity	Practical 2,4-D capacity
Existing capital investments	Yes	Yes	Yes
Product mix	Yes	Yes	Yes
Normal downtime, maintenance, repair and clean-up	No	Yes	Yes
Existing labor force	No	Yes	Yes
Availability of material inputs	No	Yes	Yes
Actual number of shifts and hours operated	No	Yes	Yes
Limited to 2,4-D	No	No	Yes

II-3a. Production using same machinery. —Continued

Quantity (in 1,000 pounds dry weight acid equivalent)												
		Calendar year	January-September									
Item	2021	2022	2023	2023	2024							
Capacity measures: Installed overall capacity ¹												
Practical overall capacity ¹²												
Practical 2,4-D capacity ^{3 4}	0	0	0	0	0							
Production of: 2,4-D ^{3 4}	0	0	0	0	0							
Other products ⁵												
Total production using same machinery or												
workers	0	0	0	0	0							

¹ Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period.

5	Please	identify	these	products:	

II-3b. **Operating parameters.**—The **practical** overall capacity reported in II-3a is based on the following operating parameters:

Hours per week	Weeks per year

² Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" and "practical" overall production capacities.

³ Data entered in question II-9 for this indicator will populate here.

⁴ Data reported for practical 2,4-D capacity should be greater than the data reported for production of 2,4-D in each period, if not revise prior to submission to the Commission. Additionally, if your firm reports the production of no other products on the same machinery and using the same workers as 2,4-D then "practical overall" and "practical 2,4-D" capacity measures should be equal to each other.

firm's were repor but w	practical overall capacity over the per binding over different periods reporte ted practical overall capacity. If a cons	ase describe the constraint(s) that set the limit(s) on your riod reported in question II-3a. If different constraints d, please specify when each constraint was limiting your straint was not actually binding over the period reported, stalled capacity level, indicate at what level it would have
	straint ck as many as appropriate)	Description (If checked, please describe the details, timing, and duratiof the constraint; leave completely blank if not applicable,
	Production bottlenecks	
	Existing labor force	
	Supply of material inputs	
	Fuel or energy	
	Storage capacity	
	Logistics/transportation	
	Other constraints (list the specific constraints in the description field)	
and the	ne additional actions that would be ne	e describe and quantify the amount of time it would take eded (e.g., hiring new workers, expanding shifts, oply, etc.) for your firm to be able to fully utilize the in II-3a.

itch :																						
itch ı																						
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	(i.e., h			-	-					-								-	•	duc	e ot	ther
							-						-				-	-				-
							-						-				-	-				ween

II-5. <u>Capacity checklist.</u> —Please check that the capacity numbers reported in question II-3a follow the Commission's relevant definitions for capacity.

Item	√ if Yes
Are all three capacity measures reported based on <u>currently installed machinery</u> <u>and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	
Are practical overall capacity and practical 2,4-D capacity measures reported based on <u>existing labor force</u> (i.e., the reported capacity level would not require hiring additional production related workers or adding shifts)?	
Are practical overall capacity and practical 2,4-D capacity measures based on <i>the actual availability of material inputs</i> ?	
Do both practical overall capacity and practical 2,4-D capacity measures account for <i>normal downtime, maintenance, repair and clean-up</i> activities?	
Does the difference between practical overall capacity and practical 2,4-D capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	

Note: If your firm is not able to answer "yes" to any of the above criteria as it relates to your firm's reported capacity levels, please revise your capacity numbers to be in conformance with the appropriate definition prior to submission to the Commission.

I-6.			hat percentage of your firm's total sales in its most recent fiscal year was s of 2,4-D? percent.
I-7a.	productio	n of 2,4-D	nare of production in China or India. —Please estimate the percentage of total in the country specified on the certification page (China or India) accounted for action in 2023 percent.
I-7b.	total expo	rts to the	united States of 2,4-D from the country specified on the certification page bunted for by your firm's exports in 2023 percent.
I-8.		-	e actions. —Is the 2,4-D exported by your firm subject to ervailing duty/safeguard findings, remedies, or proceedings?
	No	Yes	If yes—List the products(s), countries affected, and the date of such findings/remedies/proceedings.

II-9. <u>Trade data: 2,4-D</u>. — Report your firm's capacity, production, shipments, and inventories related to the production of 2,4-D in your establishment(s) in China or India during the specified periods. Do not include resales of 2,4-D that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-11.

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

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

"Production" – All production in your establishment(s) in China or India, including production consumed internally within your firm and production for another firm under a toll agreement.

"Shipments"—Shipments of products produced in your establishment(s) in China or India. Quantities reported should be net of returns.

"Home market commercial shipments"—Shipments, other than internal consumption and transfers to related firms, within China or India.

"Home market internal consumption/transfers to related firms"—Shipments made to related firms in China or India, including product consumed internally by your firm.

"Export shipments"—Shipments to destinations outside of the country indicated on page 1 (China or India), 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-9. <u>Trade data: 2,4-D.</u> — *Continued.*

Q	uantity (<i>in</i>	1,000 pound	s dry weigh	nt acid equi	valent)			
		Acti	Projections ¹					
	C	alendar yea	r	January-S	eptember	Calendar year		
Item	2021	2022	2023	2023	2024	2024	2025	
Practical 2,4-D capacity ² (A)								
Beginning-of-period inventories (B)								
Production of 2,4-D ² (C)								
Home market shipments: Internal consumption/ transfers (D)								
Commercial shipments (E)								
Export shipments: to the United States (F)								
to all other markets (G) ³								
Total exports (H)	0	0	0	0	0	0	0	
Total shipments (I)	0	0	0	0	0	0	0	
End-of-period inventories (J)								
¹ Explain the basis of your firm	's projection	s: .						

RECONCILIATION OF 2,4-D SHIPMENTS, PRODUCTION, AND INVENTORY. —Generally, the data reported for the end-of-period inventories (i.e., line J) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

		Act	ual experie	ence		Projections			
	C	alendar yea	r	January-	September	Calendar year			
Item	2021	2022	2023	2023	2024	2024	2025		
B + C - D - E - F - G - J = should equal									
zero ("0") or provide an explanation.1	0	0	0	0	0	0	0		

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

² Report your firm's practical 2,4-D capacity consistent with the definitions and instructions included in question II-3a.

³ Identify your firm's principal other export markets:

II-10. Exports to the United States not produced by your firm. —Report your firm's exports to the United States of 2,4-D that was produced in China or India but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-9.

Quantity (in 1,000 pounds dry weight acid equivalent)							
	Actual experience				Projections		
	Calendar year			January-September		Calendar year	
Item	2021	2022	2023	2023	2024	2024	2025
Exports of 2,4-D to the United States not produced by your firm ¹							
¹ List the producer(s)		•		•			

II-11.	Other explanations. —If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

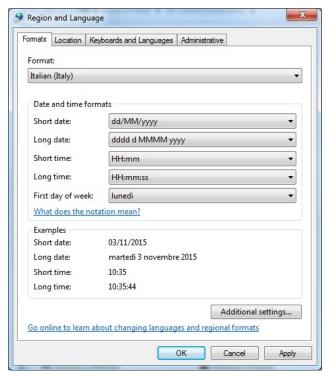
Correcting Valid number error messages. —If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields.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

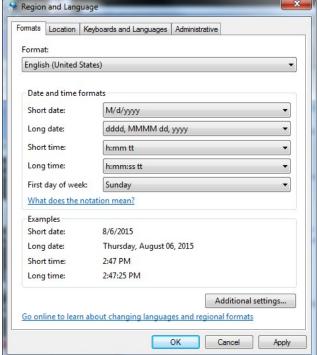
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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

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

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

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

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

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

• E-mail. — E-mail the MS Word questionnaire to 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 produce or export this product, please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission's secure submission portal or email.

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