FOREIGN PRODUCERS'/EXPORTERS' QUESTIONNAIRE

METHYLENE DIPHENYL DIISOCYANATE ("MDI") PRODUCTS FROM CHINA

This questionnaire must be received by the Commission by <u>February 26, 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 antidumping duty investigation concerning MDI products from China (Inv. No. 731-TA-1733 (Preliminary)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII.

	Name of firm				
Address					
Website _	Website				
Has your fir 2022?	m produced or exported MDI products (as de	efined on next page) in China at any time since Janu	ary 1,		
☐ NO	(Sign the certification below and promptly ret	turn only this page of the questionnaire to the Commissio	on)		
☐ YES	(Complete all parts of the questionnaire, and	return the entire questionnaire to the Commission)			
•		e portal by clicking on the following link: LIMINARY. See last page for detailed instruction	ons.		
	CERTIFIC	CATION			
and belief and unders certification I also gra this questionnaire an same or similar mercl I, the undersigned, a proceeding or other p	stand that the information submitted is subj int consent for the Commission, and its empl d throughout this proceeding in any other nandise. cknowledge that information submitted in proceedings may be disclosed to and used:	nuestionnaire is complete and correct to the best of ject to audit and verification by the Commission. By loyees and contract personnel, to use the information import-injury proceedings conducted by the Commission of the commission of the commission, its employees and Offices or a related proceeding or (b) in internal investigation.	y means of this ion provided in mission on the hroughout this s, and contract		
reviews, and evaluati 3; or (ii) by U.S. gove	ons relating to the programs, personnel, and	or a related proceeding, or (b) in internal investig d operations of the Commission including under 5 L , solely for cybersecurity purposes. I understand th	J.S.C. Appendix		
Name of Authorized (Official Title of Authorized Official	Date			
Signature	Phone	Email address			

PART I.—GENERAL INFORMATION

Background. --This proceeding was instituted in response to a petition filed on February 12, 2025, by This proceeding was instituted in response to a petition filed on February 12, 2025, by the MDI Fair Trade Coalition consisting of BASF Corporation, Florham Park, New Jersey; and The Dow Chemical Company, Midland, Michigan. 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 dumping. Pertinent information to this proceeding is available at:

Questionnaires: https://usitc.gov/reports/active_import_injury_questionnaires.

Other case information: https://ids.usitc.gov/case/8267/investigation/8705

MDI products covered by this petition is aromatic polyisocyanate material whose composition includes two or more isocyanate groups (i.e., functional group containing a nitrogen atom, a carbon atom, and an oxygen atom bonded together (-NCO)) attached to one or more benzene rings (i.e., flat, symmetrical molecule made up of six carbon atoms arranged in a hexagonal ring and has the chemical formula C6H6) that are joined by methylene bridges (i.e., a carbon atom bound to two hydrogen atoms (-CH2-) and connected by single bonds to two other distinct atoms in the rest of the molecule). These products are commonly called Polymeric, Monomeric, or Modified Methylene Diphenyl Diisocyanate ("MDI") and also known as Methylene bisphenyl isocyanate, 4,4'-Diphenylmethane diisocyanate, Methylene di-phenylene ester of isocyanic acid, Methylene bis(4-phenyl isocyanate), among others. MDI is normally associated with Chemical Abstracts Service ("CAS") registry numbers 9016-87-9, 101-68-8, 5873-54-1, 2536-05-2, 2536-05-2, 25686-28-6, 26447-40-5, and 39310-05-9, but several others are also used.

MDI ranges in physical form from low viscosity liquids to solids. MDI is covered by the scope of this petition irrespective of whether it has gone through a distillation process and regardless of acid content, reactivity, functionality, freeze stability, physical form, viscosity, grade, purity, molecular weight, or packaging.

MDI may contain additives, such as catalysts, solvents, plasticizers, antioxidants, fire retardants, colorants, pigments, diluents, thickeners, fillers, softeners, toughening agents. The scope does not include mixtures of MDI with other materials, when the combined MDI component comprises less than 40 percent of the total weight of the mixture.

MDI may be partially reacted with itself, polyol, or polyamines, and retain MDI component that has not fully chemically reacted so as to convert it into a different product no longer containing isocyanate groups. These products are known as homopolymer, uretonimine MDI, carbodiimide MDI, or prepolymers. The scope does not include partially reacted MDI when its NCO content is less than 10 weight percentage.

For MDI that enter as part of a system with separately packaged polyol, only the MDI portion of the system is included in the scope. The scope does not include any separately packaged polyol that would not fall within the scope if entered on its own.

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

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

This merchandise is currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 2929.10.8010 and 3909.31.0000. Subject merchandise may also be entered under subheadings 3909.50.5000, 3824.99.2900, 3824.99.9397, 3506.91.5000, 3815.90.5000, 3911.90.4500, 3921.13.5000, 3920.99.5000. The HTSUS subheadings are provided for convenience and customs purposes only; the written description of the scope is dispositive.

Reporting of information.--If information is not readily available from your records, provide carefully prepared estimates. 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 are provided at the end of this questionnaire and are available upon request from Lawrence Jones (202-205-3358, lawrence.jones@usitc.gov).

I-1.	Reporting requirementsPlease 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.

" <u>Establishment</u> "Each facility of a firm in China involved in the production or export of MDI
products, including auxiliary facilities operated in conjunction with (whether or not physically
separate from) such facilities. Firms operating more than one establishment in China 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 producersDoes your firm or any related firm produce, have the capability to produce,
	or have any plans to produce MDI products 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 U.S. producers' questionnaire.

I-4. Related U.S. importers.--Does your firm or any related firm import or have any plans to import MDI products 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 MDI products since January 1, 2024.

	Importer's name	Contact person	Email	Telephone	Share of your firm's 2024 U.S. exports (%)
1					
2					
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 Lawrence Jones (202-205-3358, Lawrence.jones@usitc.gov). **Supply all data requested on a <u>calendar-year</u> 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. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of MDI products since January 1, 2022.

Check	as many as appropriate.	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. 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 MDI products 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 MDI products, 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 cleanup. 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 MDI products capacity" – The level of production of MDI products 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 MDI products based on the actual product mix experienced over the period.

"Production" – All production in your establishment(s) in China, 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 MDI products 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 MDI products	No	No	Yes

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

Quantity (in short tons)						
	Calendar year					
Item	2022	2023	2024			
Capacity measures:						
Installed overall capacity ¹						
Practical overall capacity ¹²						
Practical MDI products capacity ^{3 4}	0	0	0			
Production of: MDI products ^{3 4}	0	0	0			
Other out-of-scope products: Toluene di-isocyanate (TDI products)						
Other products ⁵						
Subtotal, all out-of-scope products	0	0	0			
Total production using same machinery or workers	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.

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 MDI products capacity should be greater than the data reported for production of MDI products 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 MDI products then "practical overall" and "practical MDI products" capacity measures should be equal to each other.

⁵ Please identify these products: _____.

firm's were repor but w	practical overall capacity over the peri binding over different periods reported ted practical overall capacity. If a cons	se describe the constraint(s) that set the limit(s) on your iod reported in question II-3a. If different constraints d, please specify when each constraint was limiting your traint was not actually binding over the period reported, talled capacity level, indicate at what level it would have
	straint eck as many as appropriate)	Description (If checked, please describe the details, timing, and dura of 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 nee	describe and quantify the amount of time it would take eded (e.g., hiring new workers, expanding shifts, ply, etc.) for your firm to be able to fully utilize the in II-3a.

prante to pr	oduce M	DI products.
• •	your firm	able to switch production (capacity) between MDI products and other products ame equipment and/or labor?
No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
` '	g., time,	ribe the factors that affect your firm's ability to shift capacity between products cost, relative price change, etc.), and the degree to which these factors enhance is such shifts.

II-5.	Capacity checklistPlease 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 MDI products 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 MDI products capacity measures based on the actual availability of material inputs?	
Do both practical overall capacity and practical MDI products capacity measures account for <i>normal downtime, maintenance, repair and clean-up</i> activities?	
Does the difference between practical overall capacity and practical MDI products 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.

- II-6. <u>Share of sales.</u>--What percentage of your firm's total sales in its most recent fiscal year was represented by sales of MDI products? percent.
- II-7a. Firm's estimated share of production in China.--Please estimate the percentage of total production of MDI products in the country specified on the certification page accounted for by your firm's production in 2024. _____ percent.
- II-7b. <u>Firm's estimated share of exports from China</u>.--Please estimate the percentage of total exports to the United States of MDI products from the country specified on the certification page accounted for by your firm's exports in 2024. _____ percent.
- II-8. <u>Third country trade actions</u>.--Is the MDI products exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?

No	Yes	If yesList the products(s), countries affected, and the date of such findings/remedies/proceedings.

II-9. <u>Trade data</u>.--Report your firm's capacity, production, shipments, and inventories related to the production of MDI products in your establishment(s) in China during the specified periods. Do not include resales of MDI products 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-10.

<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, you are required to combine data for those establishments within one foreign producer questionnaire response.

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

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

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

"Export shipments"--Shipments to destinations outside of the country indicated on page 1 (China), 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. **Trade data.**--*Continued*.

	Quantity	(in short ton	s)			
	Ac	tual experier	Projections ¹			
	(Calendar yea	Calendar year			
Item	2022 2023		2024	2025	2026	
Practical MDI products capacity ² (A)						
Beginning-of-period inventories (B)						
Production 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	
Total shipments (I)	0	0	0	0	0	
End-of-period inventories (J)						
¹ Explain the basis of your firm's pro	jections:	·				

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

RECONCILIATION OF 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.

	Ac	tual experier	Projections			
		Calendar yea	r	Calendar year		
Item	2022	2023	2024	2025	2026	
B + C - D - E - F - G - J = should equal						
zero ("0") or provide an explanation. ¹	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:

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 MDI products that was produced in China but not by your firm during the specified periods. Note these data should <u>not</u> be included in question II-9.

Quantity (in short tons)					
	Actual experience		Projections Calendar year		
	Calendar year				
Item	2022	2023	2024	2025	2026
Exports of MDI products to the United States not produced by your firm ¹					
¹ List the producer(s)		•	•	•	•

II-11.	Other explanationsIf 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.

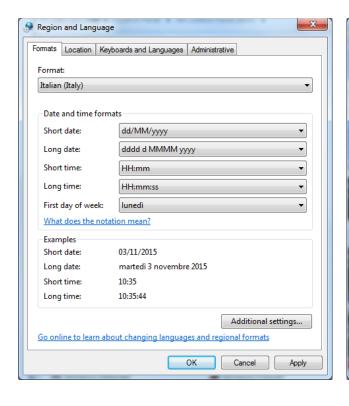
Correcting Valid number error messages. -- If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. 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.

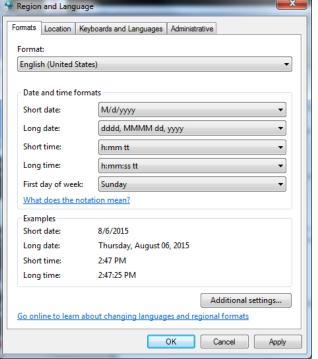
The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

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 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 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 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: MDIP Phase: Preliminary

• E-mail.— E-mail the MS Word questionnaire to <u>lawrence.jones@usitc.gov</u>; 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.