U.S. PURCHASERS' QUESTIONNAIRE

SODIUM GLUCONATE, GLUCONIC ACID, AND DERIVATIVE PRODUCTS FROM CHINA

This questionnaire must be received by the Commission by <u>August 6, 2018</u>
See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing duty and antidumping investigations concerning sodium gluconate, gluconic acid, and derivative products ("GNA products") from China (Inv. Nos. 701-TA-590 and 731-TA-1397 (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)). Further information on this questionnaire can be obtained from Fernando Gracia (202-205-2747, Fernando.Gracia@usitc.gov).

Name of firm

	State Zip Code	
Website		
Has your firm time since Jan	purchased GNA products (as defined on next page) from <u>any</u> source (domestic or foreign) at any uary 1, 2015?	
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)	
-	tionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the k: https://dropbox.usitc.gov/oinv/ . (PIN: GNAP)	
	CERTIFICATION	
lge and belief ar ng this certifica	mation herein supplied in response to this questionnaire is complete and correct to the and understand that the information submitted is subject to audit and verification by the Compition I also grant consent for the Commission, and its employees and contract personnel, this auestionnaire and throughout this proceeding in any other import-injury proceedings co	nission. By to use the
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PART I.—GENERAL INFORMATION

<u>Background</u>. -- This proceeding was instituted in response to a petition filed on November 30, 2017, by PMP Fermentation Products, Inc., Peoria, Illinois. 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 https://www.usitc.gov/investigations/701731/2017/sodium_gluconate_gluconic_acid_and_derivative/final.htm.

GNA products covered by these investigations are defined as all grades of sodium gluconate, liquid gluconate, and gluconic acid, regardless of physical form (including, but not limited to substrates; solutions; dry granular form or powders, regardless of particle size; or as a slurry). The scope also includes sodium gluconate, liquid gluconate, and gluconic acid that has been blended or is in solution with other product(s) where the resulting mix contains 35 percent or more of sodium gluconate, liquid gluconate, and/or gluconic acid (including glucono delta lactone, in essence dry gluconic acid, commonly referred to as GDL) by dry weight. Sodium gluconate has a molecular formula of NaC₆H₁₁O₇; gluconic acid has a molecular formula of C₆H₁₂O₇; liquid gluconate is a blend of gluconic acid and sodium gluconate in an aqueous solution; and GDL has a molecular formula of $C_6H_{10}O_6$. Sodium gluconate has a Chemical Abstract Service (CAS) registry number of 527-07-1, and can also be called "sodium salt of gluconic acid" and/or sodium 2, 3, 4, 5, 6-pentahydroxy-hexanoate. Liquid gluconate has CAS registry numbers of 527-07-1, 526-95-4, and 7732-18-5, and can also be called 2, 3, 4, 5, 6-Pentahydroxycaproic acid-hexanoate. Gluconic acid has a CAS registry number of 526-95-4, and can also be called 2, 3, 4, 5, 6-Pentahydroxycaproic Acid. GDL has a CAS registry number of 90-80-2, and can also be called D-Glucono-1,5-lactone. The merchandise covered by the scope of this investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings 2918.16.1000, 2918.16.5010, and 2932.20.5020. Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the merchandise is dispositive.

GNA products are currently imported under statistical reporting numbers 2918.16.10 and 2918.16.50 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

<u>Purchaser</u>.--Any firm engaged, either directly or through a parent company or subsidiary, in purchasing GNA products from another firm that produces, imports, or otherwise distributes GNA products.

<u>Reporting of information</u>.-- If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

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

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

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

by this questionnaire, if	<u>Establishments covered.</u> Provide the name and address of your U.S. establishment(s) covered by this questionnaire, if different from that listed on the cover page. Firms operating more than one establishment should combine the data for all establishments into a single response.					
		purchase of GNA products, including er or not physically separate from) such				
. OwnershipIs your firm	n owned, in whole or in part, by	any other firm?				
No Yes-	-List the following information.					
Firm name	Address	Extent of ownership (percent)				
foreign, which import G United States?		y related firms, either domestic or ates or which export GNA products to the				
Firm name	Country	Affiliation				
produce GNA products?	Related producersDoes your firm have any related firms, either domestic or foreign, which produce GNA products? No YesList the following information.					
Firm name	Country	Affiliation				
1						

PART II.--PURCHASES

<u>Contact information</u>.--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this questionnaire.

Name	
Title	
Email	
Telephone	

II-1. <u>Purchases and imports.--</u>Report <u>separately</u> your firm's domestic purchases and imports of GNA products.

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

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

Quantity (in 1,000 dry pounds)						
		Januar	y-June			
Item	2015	2016	2017	2017	2018	
Purchases of GNA products produced in United States						
China						
All other countries ¹						
Sources unknown						
Total purchases	0	0	0	0	0	
Imports of GNA products from— China						
All other countries ¹						
Total imports	0	0	0	0	0	
¹ Please identify these countries:						

II-2. Changes in purchasing patterns.--Please indicate how the shares of your firm's purchases of GNA products from different sources have changed since January 1, 2015.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	paremase					Explanation for trend
China						
All other countries						
Sources unknown						

II-3. <u>Country knowledge</u>.--Please indicate the countries of origin with which your firm has experience or information in the GNA products market.

United States	China	Other countries	Other countries (specify)

II-4. <u>Supplier identification</u>.--Please list your firm's <u>FIVE</u> largest suppliers for GNA products since January 1, 2015. Also, provide the share of the quantity of your firm's total purchases of GNA products that each of these suppliers accounted for in 2017.

No.	Supplier's name	City and state	Share of quantity of 2017 purchases
1			%
2			%
3			%
4			%
5			%

PART III.--MARKET CHARACTERISTICS AND PURCHASING PRACTICES

III-1.	Firm typeWhich of the following best describes your firm as a purchaser of GNA products
	(check all that apply)?

End user	Distributor	Other	Describe other

If your firm is a distributor of GNA products, please answer questions III-2 and III-3.

III-2. <u>Competition for sales.</u>--Does your firm compete for sales to customers with the manufacturers or importers from which your firm purchases GNA products?

No	Yes	If yes, please describe.

III-3.	Types of customersWhat are the major types of consumers to which your firm sells GNA
	products?

If your firm is an end user of GNA products, please answer questions III-4 and III-5.

III-4. <u>End uses.</u>--List the top 3 products your firm makes using GNA products and estimate the percentage of your <u>total production cost</u> that is accounted for by GNA products and by other inputs (such as labor, energy, and other raw materials).

	Share of total cost in e		•	ır	Total (should
Product(s) your firm produces	GNA products		Other inputs		sum to 100.0% across)
produces	5 p . 5		Const. inputs		5.5.5557
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %
	%	+	%	=	0.0 %

III-5.	Demand	for	end-use	products

(a) Has the demand for your firm's final products incorporating GNA products changed since January 1, 2015?

Increased	No change	Decreased	Fluctuated

(b) Has this had any effect on your firm's demand for GNA products?

No	Yes	Explain

	U.S.	Purchase	rs' Que	stionnaire -	GNA Prod	ucts (Final)			Page 9
	III-6	. <u>Subst</u>	itutes	-Can other	products b	e substitute	d for G	iNA pı	roducts?
				lo	YesPle	ease fill out	the tal	ole.	
				F	nd use in w	hich this			changes in the price of this substitute fected the price for GNA products?
		Substi	itute		substitute		No	Yes	Explanation
	1.								
	2.								
	3.								
	III-7	States	(if kno	wn) for GN	A products	has change	d since	Janu	States and outside of the United ary 1, 2015. Explain any trends and nges in demand.
				Overall	No	Overall		tuate h no	
	M	larket		increase	change	decrease	clear		Explanation and factors
Withi	n the	e United S	tates						
Outsi	de the	e United S	tates						
	III-8. <u>Country preferences.</u> Do you or your customers ever specifically order GNA products from one country in particular over other possible sources of supply?								
		No	Y	es If yes	, identify t	he countrie	s and e	xplaiı	n.

III-9.	Importance of purchasing domestic productPlease fill out the table below, estimating the
	percentage of your firm's total 2017 purchases of GNA products that required GNA products
	produced in the United States.

Item	Estimated percentage of your firm's total 2017 purchases of GNA products
Purchases that did not require domestic product	%
Purchases that were required by law or regulation to be domestic product (e.g., government purchases under "Buy American" provisions)	%
Purchases that were not required by law or regulation, but were required by your customers to be domestic product	%
Purchases that were required to be domestic product for other reasons (explain:)	%
Total (should sum to 100.0%)	0.0 %

III-10. Conditions of competition.--

(a) Is the GNA products market subject to business cycles (other than general economywide conditions) and/or other conditions of competition distinctive to GNA products?

Check a	all that apply.	Please describe.
	No	Skip to question III-11.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) Have there been any changes in the business cycles or conditions of competition for GNA products since January 1, 2015?

No	Yes	If yes, describe.

U.S. Purchasers' Questionnaire - GNA Products (Final	U.S.	Purchasers'	Questionn	aire - GNA	Products	(Fina
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III-11.	Decisions based on producer and country-of-originHow often does your firm, and if known,
	do your customers, make purchasing decisions involving GNA products based on its producer or
	country of origin?

	Always	Usually	Sometimes	Never	If at least sometimes, explain.
		D	ecision based o	on produc	cer
Your firm					
Your customers					
Decision based on country of origin					origin
Your firm					
Your customers					

III-12. **Availability of supply.--**Has the availability of GNA products in the U.S. market changed since January 1, 2015?

Availability in the U.S.			Please explain, noting the countries and reasons for the
market	No	Yes	changes.
U.Sproduced product			
Subject imports			
Nonsubject imports			

III-13. <u>Supply constraints.</u>--Has any firm refused, declined, or been unable to supply your firm with GNA products since January 1, 2015 (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, etc.)?

No	Yes	If yes, please describe.

III-14. **Availability of specific product types.--**Are certain grades/types/sizes of GNA products only available from certain country sources?

No	Yes	If yes, please identify the countries and the grade/type/size.

III-15. Purchasing frequency.--

	(a)	How frequently does your firm make purchases of GNA products (check one)?						
		Daily	Weekly	Monthly	Quarterly	Annually	Other	If other, specify
	(b)	Has this purchasing frequency changed since January 1, 2015?						
		No	Yes	If yes, please	describe.			
III-16.				ntactedHow weena		•	r firm ger	nerally contact before
III-17.		_		Do your firm's irchaser?	purchases of	GNA produc	cts usually	y involve negotiations
		No	If yes, explain the factors your firm generally negotiates and note No Yes whether your firm quotes competing prices during negotiations.					
III-18.	<u>Change</u>	in suppl	iers Ha	ıs your firm ch	anged suppli	ers since Jan	uary 1, 20	015?
			.,					rm was added or
		No	Yes	dropped, and	the reasons	for the char	nge.	
III-19.		v suppliersAre you aware of any new suppliers, either foreign or domestic, that have ered the market since January 1, 2015?						
	No	Yes If yes, please identify the firms.						

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III-20.	<u>Supplier qualification</u> Do you require your suppliers to be or to become certified or qualified
	to sell GNA products to your firm?

If yes, provide the following information.

- The number of days to qualify a new supplier.
- A general description of the certification or qualification process. Also, a brief description of the factors that you consider when qualifying a new supplier (e.g., quality of product, reliability of supplier, etc.).

No	Number of days	Process and factors

III-21. <u>Failure to certify</u>.--Since January 1, 2015, have any domestic or foreign producers failed in their attempts to certify or qualify their GNA products with your firm or have any producers lost their approved status?

No	If yes, please identify these firms, the countries where they are located, and the reasons why they failed the certification/qualification.

III-22. <u>Major purchasing factors</u>.--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase GNA products (examples include availability, extension of credit, contracts, price, quality, range of supplier's product line, traditional supplier, etc.).

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

III-23. Purchasing factors.--Please rate the importance of the following factors in your firm's purchasing decisions for GNA products.

Factor	Very important	Somewhat important	Not important
Availability			
Delivery terms			
Delivery time			
Discounts offered			
Extension of credit			
Minimum quantity requirements			
Packaging			
Price			
Product consistency			
Product range			
Quality meets industry standards			
Quality exceeds industry standards			
Reliability of supply			
Technical support/service			
U.S. transportation costs			

	U.S. transportation costs			
III-24.	Quality characteristics What charact quality of GNA products?	eristics does your	firm consider who	en determining th

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III-25.	Minimum qualityHow often do GNA products from the following countries meet minimum
	quality specifications for your uses or your customers' uses?

Source	Always	Usually	Sometimes	Rarely or never	Don't know
United States					
China					
Other:					

III-26. <u>Frequency of decisions based on price</u>.--How often does your firm purchase the GNA products that are offered at the lowest price?

Always	Usually	Sometimes	Never

III-27. <u>Price leaders.--</u>A price leader is defined as (1) one or more firms that initiate a price change, either upward or downward, that is followed by other firms, or (2) one or more firms that have a significant impact on prices. A price leader is not necessarily the lowest-priced supplier.

Please list the names of any firms you considered price leaders in the GNA products market since January 1, 2015.

Firm(s)	Describe how the firm(s) exhibited price leadership	

III-28. Purchasing subject imports rather than domestic products.—

(a)	Since January 2015, did your firm purchase imports of GNA products from China instead
	of U.Sproduced GNA products?

	Yes	No
Source	(also respond to parts (b) and (c))	(If "No", skip to next question)
China		

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

Source	Yes	No
China		

(c) If you responded "Yes" to part (a), was price a primary reason for purchasing subject imports from China rather than domestic product?

Source	Yes	If Yes, estimate the quantity of imports purchased instead of domestic product since January 2015 (in 1,000 dry pounds)	No	If No, please indicate the reason your firm purchased imports instead of domestic product
China				

III-29. U.S. producers and import competition.—

(a) Since January 1, 2015, in connection with a sale or offer to sell GNA products to your firm, did U.S. producers reduce their prices of domestically produced GNA products in order to compete with lower-priced imports of GNA products from China?

Source	Yes (also respond to question part (b))	No (If "No", skip to next question)	Don't know
China			

(b) If your firm responded "yes", please provide an estimate of the reduction in U.S. producers' prices, and any additional explanations, such as timing (e.g., months/years), frequency of price reductions, or other market/competitive factors.

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

PART IV.—PRODUCT COMPARISONS

IV-1. <u>Interchangeability.--</u>Are GNA products produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

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

F = the products are *frequently* interchangeable

S = the products are sometimes interchangeable

N = the products are *never* interchangeable

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

Country-pair	China	Other countries
United States		
China		

For any country-pair producing GNA products which is *sometimes* or *never* interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:

IV-2. <u>Factors other than price</u>.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between GNA products produced in the United States and in other countries a significant factor in your firm's purchases of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are always significant

F = such differences are *frequently* significant

S = such differences are sometimes significant

N = such differences are *never* significant

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

Country-pair	China	Other countries
United States		
China		

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

IV-3. <u>Factor country comparisons.</u>--For the factors listed below, please rate how GNA products produced in each country you identified in your response to the first question in Part IV compares with GNA products produced in each of the other countries you identified.

If you are unfamiliar with the product from a particular country, please leave the boxes for those country comparisons blank.

	Product from <u>United States</u> compared to product from <u>China</u>			Product from <u>United States</u> compared to product from <u>Nonsubject</u> countries			Product from China compared to product from Nonsubject countries		
Factor	Superior	Comparable	Inferior	Superior	Comparable	Inferior	Superior	Comparable	Inferior
Availability									
Delivery terms									
Delivery time									
Discounts offered									
Extension of credit									
Minimum quantity requirements									
Packaging									
Price ¹									
Product consistency									
Product range									
Quality meets industry standards									
Quality exceeds industry standards									
Reliability of supply									
Technical support/service									
U.S. transportation costs ¹									

¹ A rating of superior on price and U.S. transportation costs indicates that the first country generally has lower prices/U.S. transportation costs than the second country.

PART V.—ADDITIONAL INFORMATION

V-1.	<u>Other explanations</u> If your firm would like to further explain a response to any question that did not provide a narrative response box, please note the question number and the explanation in the space provided below.					

V-2. **OMB statistics.**--Please report the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 25 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 attach such comments to your response or send to the Office of Investigations, USITC, 500 E St. SW, Washington, DC 20436.

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://www.usitc.gov/investigations/701731/2018/sodium_gluconate_gluconic_acid_a nd_derivative/final.htm

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 Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: https://dropbox.usitc.gov/oinv/ Pin: GNAP

• E-mail.—E-mail the MS Word questionnaire to Fernando.gracia@usitc.gov; include a scanned copy of the signed certification page (page 1). Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure drop-box system and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm's nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.

If your firm <u>does not</u> purchase this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

<u>Parties to this proceeding</u>.—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission's Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire your firm submits (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.