

U.S. PRODUCERS' QUESTIONNAIRE

CITRIC ACID AND CERTAIN CITRATE SALTS ("CACCS") FROM BELGIUM, COLOMBIA, AND THAILAND

This questionnaire must be received by the Commission by **March 5, 2018**
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 antidumping and countervailing duty investigations concerning CACCS from Belgium, Colombia, and Thailand (Inv. Nos. 701-TA-581 and 731-TA-1374-1376 (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 produced CACCS (as defined on next page) at any time since January 1, 2015?
<input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
<input type="checkbox"/> YES (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)
Return questionnaire via the U.S. International Trade Commission Drop Box by clicking on the following link: https://dropbox.usitc.gov/oinv/. (PIN: CBCT)

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 a petition filed on June 2, 2017, by Archer Daniels Midland Company, Decatur, Illinois; Cargill, Incorporated, Minneapolis, Minnesota; and Tate & Lyle Ingredients Americas, LLC, Hoffman Estates, Illinois. Countervailing/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/dumping. Questionnaires and other information pertinent to this proceeding are available at [https://usitc.gov/investigations/701731/2017/citric acid and certain citrate salts belgium/final.htm](https://usitc.gov/investigations/701731/2017/citric%20acid%20and%20certain%20citrate%20salts%20belgium/final.htm).

CACCS covered by these investigations is all grades and granulation sizes of citric acid, sodium citrate, and potassium citrate in their unblended forms, whether dry or in solution, and regardless of packaging type. The scope also includes blends of citric acid, sodium citrate, and potassium citrate; as well as blends with other ingredients, such as sugar, where the unblended form(s) of citric acid, sodium citrate, and potassium citrate constitute 40 percent or more, by weight, of the blend.

The scope also includes all forms of crude calcium citrate, including dicalcium citrate monohydrate, and tricalcium citrate tetrahydrate, which are intermediate products in the production of citric acid, sodium citrate, and potassium citrate.

The scope includes the hydrous and anhydrous forms of citric acid, the dihydrate and anhydrous forms of sodium citrate, otherwise known as citric acid sodium salt, and the monohydrate and monopotassium forms of potassium citrate. Sodium citrate also includes both trisodium citrate and monosodium citrate which are also known as citric acid trisodium salt and citric acid monosodium salt, respectively.

The scope does not include calcium citrate that satisfies the standards set forth in the United States Pharmacopeia and has been mixed with a functional excipient, such as dextrose or starch, where the excipient constitutes at least 2 percent, by weight, of the product.

Citric acid and sodium citrate are classifiable in subheadings 2918.14.00 and 2918.15.10 of the HTSUS, respectively. Potassium citrate and crude calcium citrate are classifiable in subheading 2918.15.50 and, if included in a mixture or blend, subheading 3824.99.92 (statistical reporting number 3824.99.9295) of the HTSUS. Blends that include citric acid, sodium citrate, and potassium citrate are also imported under statistical reporting number 3824.99.9295 of the HTSUS. Although the HTSUS subheadings are provided for convenience and customers purposes, the written description of the merchandise 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, 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.

I-1a. **OMB statistics.**--Please report below 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 50 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.

I-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

Yes No

I-2. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

"Establishment" – Each facility of a firm involved in the production of CACCS, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discussion on establishments consolidated in this questionnaire: _____.			

I-3. **Petition support.**--Does your firm support or oppose the petition?

Country	Support	Oppose	Take no position
Belgium	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Colombia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand (AD)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand (CVD)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information.

Firm name	Address	Extent of ownership (percent)

I-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing CACCS from Belgium, Colombia, and/or Thailand into the United States or that are engaged in exporting CACCS from Belgium, Colombia, and/or Thailand to the United States?

No Yes--List the following information.

Firm name	Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Amelia Shister (202-205-2047, amelia.shister@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	
Fax	

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of CACCS since January 1, 2015.

<i>(check as many as appropriate)</i>		<i>(If checked, please describe; leave blank if not applicable)</i>
<input type="checkbox"/>	plant openings	
<input type="checkbox"/>	plant closings	
<input type="checkbox"/>	relocations	
<input type="checkbox"/>	expansions	
<input type="checkbox"/>	acquisitions	
<input type="checkbox"/>	consolidations	
<input type="checkbox"/>	prolonged shutdowns or production curtailments	
<input type="checkbox"/>	revised labor agreements	
<input type="checkbox"/>	other (e.g., technology)	

II-3a. **Production using same machinery.**--Please report your firm's production of products made on the same equipment and machinery used to produce CACCS, and the combined production capacity on this shared equipment and machinery in the periods indicated.

"Overall production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Note.--If your firm does not produce any out-of-scope merchandise on the same machinery and equipment as scope merchandise (i.e., you have reported no data for "other products" in this question) then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-9. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise (i.e., you have reported data for "other products" in this question), then the "average production capacity" reported in question II-9 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise (i.e., "average production capacity" in question II-9 should be smaller than "overall production capacity" in this question).

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

Quantity (in 1,000 dry pounds)			
Item	Calendar years		
	2015	2016	2017
Overall production capacity			
Production of:			
Citric acid and certain citrate salts ¹	0	0	0
Other products ²			
Total, using same machinery	0	0	0
¹ Data entered for production of citric acid and certain citrate salts will populate here once reported in question II-7. ² Please identify these products: _____.			

II-3b. **Operating parameters.**--The production capacity reported in II-3a is based on operating _____ hours per week, _____ weeks per year.

II-3c. **Capacity calculation.**--Please describe the methodology used to calculate overall production capacity reported in II-3a, and explain any changes in reported capacity.

II-3d. **Production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's production capacity.

II-3e. **Product shifting.**--

(i) Is your firm able to switch production (capacity) between CACCS and other products using the same equipment and/or labor?

No

Yes--(i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:

_____.

(ii) Please describe the factors that affect your firm's ability to shift production capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

II-4. **Tolling.**--Since January 1, 2015, has your firm been involved in a toll agreement regarding the production of CACCS?

“Toll agreement” – Agreement between two firms whereby the first firm furnishes the raw materials and the second firm uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	If yes--Please describe the toll arrangement(s) and name the firm(s) involved.
<input type="checkbox"/>	<input type="checkbox"/>	

II-5. **Decline in capacity utilization in 2017.**--Was your firm’s capacity utilization lower in 2017 compared to 2016? If yes, please describe how your firm supplied CACCS to your U.S. customers in 2017 (e.g., drawing down inventories of domestically produced CACCS, providing resales of CACCS produced by another US producer or imported, or just lost sales).

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

II-6a. **Production processes.**--Please identify the production process your firm utilizes for production of citric acid?

- Deep tank method
- Shallow pan method
- Other (please specify:)

II-6b. **Raw materials.**--Please identify the raw materials your firm utilizes for production of citric acid?

- Corn
- Sugar beets
- Other (please specify:)

II-6c. **Operation costs.**--Based on a.) and b.), please discuss how that affects your operation costs.

II-7. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce CACCS in and/or admit CACCS into a foreign trade zone (FTZ)?

“**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. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes-- Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import CACCS into a foreign trade zone (FTZ) for use in distribution of CACCS and/or the production of downstream articles?

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

II-8. **Importer.**--Since January 1, 2015, has your firm imported CACCS?

“**Importer**” – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf. The importer may be the consignee, or the importer of record.

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

- II-9. **Production, shipment, and inventory data**--Report your firm's production capacity, production, shipments, and inventories related to the production of CACCS in its U.S. establishment(s) during the specified periods.

"Average production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

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

"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 domestic firms. Such transactions are valued at fair market value.

"Related firm" – A firm that your firm solely or jointly owns, manages, or otherwise controls.

"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-9. **Production, shipment, and inventory data.--Continued**

Quantity (in 1,000 dry pounds) and value (in \$1,000)			
Item	Calendar years		
	2015	2016	2017
Average production capacity ¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production (quantity).--			
Using corn substrates (C)			
Using sugar substrates (D)			
Using tapioca substrates (E)			
Using all other substrates ² (F)			
Total production (G)	0	0	0
U.S. shipments:			
Commercial shipments:			
Quantity (H)			
Value (I)			
Internal consumption: ³			
Quantity (J)			
Value ² (K)			
Transfers to related firms: ³			
Quantity (L)			
Value ² (M)			
Export shipments: ⁴			
Quantity (N)			
Value (O)			
End-of-period inventories (quantity) (P) ⁵			
<p>¹ The production capacity reported is based on operating ___ hours per week, ___ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity ____.</p> <p>² Identify the other substrates used in CACCS production: _____.</p> <p>³ Internal consumption and transfers to related firms must be valued at fair market value. In the event that your firm uses a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above: _____.</p> <p>⁴ Identify your firm's principal export markets: _____.</p> <p>⁵ Please describe any end-of-period inventory trends: _____.</p>			

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

Reconciliation	Calendar years		
	2015	2016	2017
B + C + D + E + F – H – J – L – N – P = should equal zero ("0") or provide an explanation. ¹	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.			

II-10. **Channels of distribution.**--Report your firm's commercial U.S. shipments by channel of distribution.

Quantity (in 1,000 dry pounds)			
Item	Calendar years		
	2015	2016	2017
Channels of distribution:			
Commercial U.S. shipments:			
To distributors (<i>quantity</i>) (Q)			
To food & beverage end users (R)			
To industrial end users (S)			
To other end users (T)			

***RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines Q through T) in each time period equal the quantity reported for commercial U.S. shipments (i.e., line H) 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 years		
	2015	2016	2017
Q + R + S + T – H = zero ("0"), if not revise.	0	0	0

II-11. **U.S. shipments by GMO classification.**--Please report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by GMO classification from 2015-17.

GMO.--In the context of U.S. producers' U.S. shipments of CACCS, GMO stands for CACCS that was produced using inputs (i.e., the substrates) that were genetically engineered or bioengineered.

Quantity (1,000 dry pounds) and Value (in \$1,000)			
Product type	Calendar years		
	2015	2016	2017
U.S. shipments.--			
GMO:			
<i>Quantity (U)</i>			
<i>Value (V)</i>			
Non-GMO but not certified or verified by any independent organization:			
<i>Quantity (W)</i>			
<i>Value (X)</i>			
"Non-GMO Project" verified:			
<i>Quantity (Y)</i>			
<i>Value (Z)</i>			
Verified or certified as non-GMO other than "Non-GMO Project" verified ¹ :			
<i>Quantity (AA)</i>			
<i>Value (AB)</i>			
¹ List the organization(s) that provide this certification and/or verification: _____			

RECONCILIATION OF SHIPMENT DATA.--Please ensure that the quantity and value of U.S. shipments reported above (i.e., lines U through AB) equal the quantity and value of U.S. shipments in in each period as reported the main trade grid, question II-8 (i.e., lines H through M). If the calculated field below returns a value other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar years		
	2015	2016	2017
Quantity: U + W + Y + AA – H – J – L = zero ("0"), if not revise.	0	0	0
Value: V + X + Z + AB – I – K – M = zero ("0"), if not revise.	0	0	0

II-12. **U.S. shipments by product type.**--Please report your firm's U.S. shipments (*i.e.*, inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by product type.

Quantity (1,000 dry pounds) and Value (in \$1,000)			
Product type	Calendar years		
	2015	2016	2017
U.S. shipments.--			
Citric acid:			
<i>Quantity (AA)</i>			
<i>Value (AB)</i>			
Sodium citrate:			
<i>Quantity (AC)</i>			
<i>Value (AD)</i>			
Potassium citrate:			
<i>Quantity (AE)</i>			
<i>Value (AF)</i>			
Crude calcium citrate:			
<i>Quantity (AG)</i>			
<i>Value (AH)</i>			
Blends: ¹			
<i>Quantity (AI)</i>			
<i>Value (AJ)</i>			
¹ Describe the blends reported: _____			

RECONCILIATION OF SHIPMENT DATA.--Please ensure that U.S. shipments reported above equal U.S. shipments as reported in question II-7. 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 years		
	2015	2016	2017
Quantity: AA + AC + AE + AG + AI – H – J – L = zero ("0"), if not revise.	0	0	0
Value: AB + AD + AF + AH + AJ – I – K – M = zero ("0"), if not revise.	0	0	0

II-13. **Commercial U.S. shipments by sale type.**--Please report your firm's commercial U.S. shipments by type of sale.

Spot sales.--Single delivery shipments (Such sales can involve a purchase agreement or contract, but which does not include provisions for multiple deliveries).

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.

Quantity (1,000 dry pounds) and Value (in \$1,000)			
Product type	Calendar years		
	2015	2016	2017
Commercial U.S. shipments.--			
Spot sales:			
Quantity (AK)			
Value (AL)			
Short term contract sales:			
Quantity (AM)			
Value (AN)			
Annual contract sales:			
Quantity (AO)			
Value (AP)			
Long-term contract sales:			
Quantity (AQ)			
Value (AR)			
¹ Describe the blends reported: _____			

RECONCILIATION OF COMMERCIAL SHIPMENT DATA.--Please ensure that commercial U.S. shipments reported above equal commercial U.S. shipments as reported in question II-7. 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 years		
	2015	2016	2017
Quantity: AK + AM + AO+ AQ – H = zero ("0"), if not revise.	0	0	0
Value: AL + AN + AP + AR – I = zero ("0"), if not revise.	0	0	0

II-14. **Employment data.**--Report your firm's employment-related data related to the production of CACCS and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) – Working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

"Hours worked" – Time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

"Wages paid" – Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar years		
	2015	2016	2017
Average number of PRWs (<i>number</i>)			
Hours worked by PRWs (<i>1,000 hours</i>)			
Wages paid to PRWs (<i>\$1,000</i>)			

Explanation of trends:

II-15. **Related firms.**--If your firm reported transfers to related firms in question II-7, please indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

II-16. **Purchases.**--Other than direct imports, has your firm otherwise purchased CACCS since January 1, 2015?

“Purchase” – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

“Direct import” –A transaction to buy from a foreign supplier where your firm is the importer of record or consignee.

No Yes--Report such purchases below and explain the reasons for your firms' purchases:

(Quantity in 1,000 dry pounds)			
Item	Calendar years		
	2015	2016	2017
Purchases from U.S. importers¹ of citric acid and certain citrate salts from-- Belgium			
Colombia			
Thailand			
All other sources			
Purchases from domestic producers²			
Purchases from other sources²			
¹ Please list the name of the importer(s) from which your firm purchased this product. If your firm’s import suppliers differ by source, please identify the source for each listed supplier: _____. ² Please list the name of the producer(s) or U.S. distributor(s) from which your firm purchased this product: _____.			

II-16. **Other explanations.**--If your firm would like to further explain a response to a question in Part II that did not provide a narrative box, 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.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Jennifer Brinckhaus (202-205-3188, jennifer.brinckhaus@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	
Fax	

III-2. **Accounting system.**--Briefly describe your firm's financial accounting system.

A. When does your firm's fiscal year end (month and day)? _____
 If your firm's fiscal year changed during the data-collection period, explain below:

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include CACCS:

2. Does your firm prepare profit/loss statements for CACCS:
 Yes No

3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.
 Audited, unaudited, annual reports, 10Ks, Monthly,
 quarterly, semi-annually, annually

4. Accounting basis: GAAP, cash, tax, or other comprehensive basis of accounting (specify) _____

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes CACCS, as well as specific statements and worksheets) used to compile these data.

III-3. **Cost accounting system.**--Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. **Allocation basis.**--Briefly describe your firm's allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

III-5. **Product listing.**--Please list the products your firm produced in the facilities in which your firm produced CACCS, and provide the share of net sales accounted for by these products in 2017.

Products	Share of sales in 2017
CACCS	%
	%
	%
	%
	%

III-6. Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of CACCS from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

Yes--Continue to question III-7. No--Continue to question III-9a.

III-7. **Inputs from related suppliers.**--Please identify the inputs used in the production of CACCS that your firm purchases from related suppliers and that are reflected in question III-9a. For "Share of total COGS" please report this information by relevant input on the basis of calendar year 2017. For "Input valuation" please describe the basis, as recorded in your company's own accounting system, of the purchase cost from the related supplier; e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate fair market value.

Input	Related supplier	Share of total COGS in 2017
Input valuation as recorded in the firm's accounting books and records (e.g., the related supplier's actual cost, cost plus, negotiated transfer price to approximate FMV, etc.)		

III-8. **Inputs purchased from related suppliers.**--Please confirm that the inputs purchased from related suppliers, as identified in III-7, were reported in III-9a (financial results on CACCS) in a manner consistent with your firm's accounting books and records.

Yes

No--In the space below, please report the valuation basis of inputs purchased from related suppliers as reported in table III-9a.

III-9a. **Operations on CACCS.**--Report the revenue and related cost information requested below on the CACCS operations of your firm's U.S. establishment(s).¹ **Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records.**

Quantity (in 1,000 dry pounds) and value (in \$1,000)			
Item	Calendar year		
	2015	2016	2017
Net sales quantities: ²			
Commercial sales ("CS")			
Internal consumption ("IC")			
Transfers to related firms ("Transfers")			
Total net sales quantities	0	0	0
Net sales values: ²			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS): ³			
Raw materials			
Direct labor			
Other factory costs			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
Selling, general, and administrative (SG&A) expenses:			
Selling expenses			
General and administrative expenses			
Total SG&A expenses	0	0	0
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0
Depreciation/amortization included above			
¹ Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u> . ² Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire. ³ COGS (whether for domestic or export sales) should include <u>costs associated with CS, IC, and Transfers</u> .			

Note--The table above contains calculations that will appear when you have entered data in the MS Word form fields.

III-9b. **Financial data reconciliation.**--The calculable line items from question III-9a (i.e., total net sales quantities and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) have been calculated from the data submitted in the other line items. Do the calculated fields return the correct data according to your firm's financial records ignoring non-material differences that may arise due to rounding?

Yes No--If the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.

Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negative--instances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (i.e., income is positive, expenses or reversals are negative).

If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

III-10. **Nonrecurring items (charges and gains) included in the subject product financial results.**--For each annual and interim period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (*in \$1,000*), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

	Calendar years		
	2015	2016	2017
Nonrecurring item: In this column please provide a brief description of each nonrecurring item and indicate the specific line item in table III-9a where the nonrecurring item is classified.	Nonrecurring item: In these columns please report the amount of the relevant nonrecurring item reported in question III-9a.		
	Value (\$1,000)		
1. , classified as			
2. , classified as			
3. , classified as			
4. , classified as			
5. , classified as			
6. , classified as			
7. , classified as			

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**--If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items are reported in question III-9a.

--

III-12. **Asset values.**--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of CACCS. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for CACCS in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a.

Note: Total assets should reflect net assets after any accumulated depreciation and allowances deducted.

Total assets should be allocated to the subject products if these assets are also related to other products. Please provide a brief explanation if there are any substantial changes in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Value (in \$1,000)			
Item	Calendar years		
	2015	2016	2017
Total assets (net) ¹			
¹ Describe _____			

III-13. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses for CACCS.

Value (in \$1,000)			
Item	Calendar years		
	2015	2016	2017
Capital expenditures ¹			
Research and development expenses ²			
¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product.			
² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product.			

III-14. **Data consistency and reconciliation.**--Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments).

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure that the quantities and values reported for total shipments in part II equal the quantities and values reported for total net sales in part III of this questionnaire in each time period. If the calculated fields below return values other than zero (i.e., "0"), please reconcile the tables or provide an explanation for the discrepancy below.

Reconciliation	Full year data		
	2015	2016	2017
Quantity: Trade data from question II-7 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II-7 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

Do these data in question III-9a reconcile with data in question II-7?

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

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15. **Effects of imports on investment.**--Since January 1, 2015, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of CACCS from Belgium, Colombia, and/or Thailand?

- No Yes--My firm has experienced actual negative effects as follows:

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

III-16. **Effects of imports on growth and development.**--Since January 1, 2015, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of CACCS from Belgium, Colombia, and/or Thailand?

- No Yes--My firm has experienced actual negative effects as follows:

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

III-17. **Anticipated effects of imports.**--Does your firm anticipate any negative effects due to imports of CACCS from Belgium, Colombia, and/or Thailand?

No	Yes	If yes, my firm anticipates negative effects as follows:
<input type="checkbox"/>	<input type="checkbox"/>	

III-18. **Other explanations.**--If your firm would like to further explain a response to a question in Part III that did not provide a narrative box, 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.

--

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from **Fernando Gracia** (fernando.gracia@usitc.gov, 202-205-2747).

IV-1. **Contact information.**--Please identify the individual that Commission staff may contact regarding the confidential information submitted in part IV.

Name	
Title	
Email	
Telephone	

PRICE DATA

IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2015 of the following products produced by your firm.

NOTE.--All values and quantities should be reported in an anhydrous equivalent basis.

For purposes of this section, the terms "spot/short term" and "annual contract" sales are defined as follows:

"Spot/short term" are any sales made pursuant to agreements of a length for less than one year.

"Annual contract" are any sales made pursuant to an annual contract (i.e., a one-year contract).

Product 1.--Citric acid, granular, in dry form in 25 kilogram and 50 pound bags, spot/short term sales.

Product 2.--Citric acid, granular, in dry form in 25 kilogram and 50 pound bags, annual contract sales.

Product 3.--Citric acid, fine granular, in dry form in 25 kilogram and 50 pound bags, spot/short term sales.

Product 4.--Citric acid, fine granular, in dry form in 25 kilogram and 50 pound bags, annual contract sales.

Product 5.--Citric acid, granular, in dry form packed in bulk sacks ("supersacks"), spot/short term sales.

Product 6.--Citric acid, granular, in dry form packed in bulk sacks ("supersacks"), annual contract sales.

Product 7.--Sodium citrate, granular, in dry form in 25 kilogram and 50 pound bags, spot/short term sales.

Product 8.--Sodium citrate, granular, in dry form in 25 kilogram and 50 pound bags, annual contract sales.

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).

IV-2a. During January 2015-December 2017, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were directly competitive with these products)?

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

IV-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

Report data in **actual dry pounds** (not 1,000s of pounds) and **actual dollars** (not 1,000s of dollars).

(Quantity in dry pounds, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2015:								
January-March								
April-June								
July-September								
October-December								
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								
October-December								

¹ 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.

² Pricing product definitions are provided on the first page of Part IV.

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:

IV-2b. **Price data.**--Continued.

Report data in **actual dry pounds** (not 1,000s of pounds) and **actual dollars** (not 1,000s of dollars).

(Quantity in dry pounds, value in dollars)								
Period of shipment	Product 5		Product 6		Product 7		Product 8	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
2015:								
January-March								
April-June								
July-September								
October-December								
2016:								
January-March								
April-June								
July-September								
October-December								
2017:								
January-March								
April-June								
July-September								
October-December								

¹ 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.

² Pricing product definitions are provided on the first page of Part IV.

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 5:
 Product 6:
 Product 7:
 Product 8:

IV-2c. **Price data checklist.**--Please check that the pricing data in question IV-2(b) has been correctly reported.

Is the price data reported above:	√ if Yes
In actual dollars (<i>not</i> \$1,000)	<input type="checkbox"/>
In actual dry pounds (<i>not</i> 1,000s of dry pounds)	<input type="checkbox"/>
F.o.b. U.S. point of shipment (i.e., does not include U.S. transport costs)?	<input type="checkbox"/>
Net of all discounts and rebates?	<input type="checkbox"/>
Have returns credited to the quarter in which the sale occurred?	<input type="checkbox"/>
Less than reported commercial shipments in question II-9 in each year?	<input type="checkbox"/>

IV-2d. **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.

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of CACCS (*check all that apply*)? If your firm issues price lists, please submit sample pages of a recent list.

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-4. **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"/>	

IV-5. **Pricing terms.**--

(a) What are your firm's typical sales terms for its U.S.-produced CACCS?

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(b) On what basis are your firm's prices of domestic CACCS usually quoted (*check one*)?

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

IV-6. **Bundling.**--For each year, please provide the quantity of shipments that were bundled sales. "Bundling" is defined as an instance in which you sold CACCS together with any other product(s) to the same customer pursuant to the same purchase agreement/contract.

Report data in **actual dry pounds** (not 1,000s of pounds).

2015	2016	2017

- (a) What products are bundled with CACCS sales?
- (b) How does your firm assign value to CACCS in its reported pricing data given the existence of any bundled sales?

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced CACCS (or check "not applicable" if your firm does not sell on a long-term, short-term and/or annual 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	<i>No. of days</i>		365	
Price renegotiation (during contract period)	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	<i>Quantity</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Price</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>Both</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Meet or release provision	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material prices ¹	<i>Yes</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<i>No</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹ Please describe method, raw material, and price index source:

IV-8. **Lead times.**--What is your firm's share of sales from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced CACCS?

Source	Share of 2017 sales	Lead time (average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

IV-9. **Shipping information.**--

- (a) What is the approximate percentage of the cost of U.S.-produced CACCS that is accounted for by U.S. inland transportation costs? _____ percent
- (b) Who generally arranges the transportation to your firm's customers' locations?
 Your firm Purchaser (*check one*)
- (c) Indicate the approximate percentage of your firm's sales of CACCS that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced CACCS since January 1, 2015 (check all that apply)?

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

IV-11. **End uses.**--List the end uses of the CACCS that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by CACCS and other inputs?

End use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	CACCS	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-12. **Substitutes.**--Can other products be substituted for CACCS?

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 CACCS?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-13. **Demand trends.**--Indicate how demand within the United States and outside of the United States (if known) for CACCS has changed since January 1, 2015. Explain any trends and describe the principal factors that have affected these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors
Within the United States	<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"/>	

IV-14. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of CACCS since January 1, 2015?

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

IV-15. **Conditions of competition.**--

(a) Is the CACCS market subject to business cycles (other than general economy-wide conditions) and/or other conditions of competition distinctive to CACCS? If yes, describe.

Check all that apply.	Please describe.
<input type="checkbox"/> No	Skip to question IV-16.
<input type="checkbox"/> Yes-Business cycles (e.g. seasonal business)	
<input type="checkbox"/> Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for CACCS since January 1, 2015?

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

IV-16. **Certifications.**--

(a) Does your firm sell CACCS that have any of the following certifications?

Certification			If yes, indicate the share of your firm's 2017 sales that were certified (percent)	Explain (including name of certifying organization and time to certify)
	No	Yes		
Halal	<input type="checkbox"/>	<input type="checkbox"/>		
Kosher	<input type="checkbox"/>	<input type="checkbox"/>		
Non-GMO but not certified or verified by any independent organization	<input type="checkbox"/>	<input type="checkbox"/>		
"Non-GMO Project" verified	<input type="checkbox"/>	<input type="checkbox"/>		
Verified or certified non-GMO by other than "Non-GMO Project" verified ¹	<input type="checkbox"/>	<input type="checkbox"/>		
Other:	<input type="checkbox"/>	<input type="checkbox"/>		
Other:	<input type="checkbox"/>	<input type="checkbox"/>		
¹ Please describe the criteria, process, and documentation that your firm considers for non-GMO product:				

(b) Has your firm's ability to supply CACCS that have certifications changed since January 2015?

No	Yes		If yes, please identify specific certifications and explain.
	Increased	Decreased	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(c) Does your firm anticipate applying to The Non-GMO Project in 2018 or 2019 or to any other organization that certifies CACCS as non-GMO, or changes in certification status?

No	Yes	If yes, please describe the changes, reasons why you anticipate applying for non-GMO certification, and certifying organization.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-17. **Supply constraints.**--Has your firm refused, declined, or been unable to supply CACCS 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, inability to supply non-GMO CACCS, etc.)?

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

IV-18. **Raw materials.**--How have CACCS raw material prices changed since January 1, 2015?

Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for CACCS.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-19. **Interchangeability.**--Is CACCS 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	Belgium	Colombia	Thailand	Canada	Other countries
United States					
Belgium					
Colombia					
Thailand					
Canada					
For any country-pair producing CACCS which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:					

IV-20. **Factors other than price.**--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between CACCS 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	Belgium	Colombia	Thailand	Canada	Other countries
United States					
Belgium	X				
Colombia	X	X			
Thailand	X	X	X		
Canada	X	X	X	X	
For any country-pair producing CACCS which is <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude interchangeable use:					

IV-21. **Customer identification.**--List the names and contact information for your firm's 5 largest U.S. customers for CACCS since January 1, 2015. Indicate the share of the quantity of your firm's total shipments of CACCS that each of these customers accounted for in 2017.

	Customer's name	City	State	Share of 2017 sales (%)
1				
2				
3				
4				
5				

Customer identification.—Continued. List the names and contact information for your firm's 5 largest U.S. customers for non-GMO CACCS since January 1, 2015. Indicate the share of the quantity of your firm's total shipments of non-GMO CACCS that each of these customers accounted for in 2017.

	Customer's name	City	State	Share of 2017 sales (%)
1				
2				
3				
4				
5				

IV-22. **Competition from imports.**--

(a) **Lost revenue.**--Since January 1, 2015: To avoid losing sales to competitors selling CACCS from Belgium, Colombia, and/or Thailand, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

(b) **Lost sales.**--Since January 1, 2015: Did your firm lose sales of CACCS to imports of this product from Belgium, Colombia, and/or Thailand?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

IV-23. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, 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.

PART V.—ALTERNATIVE PRODUCT INFORMATION (non-GMO CACCS)

Further information on this part of the questionnaire can be obtained from **Amelia Shister (202-205-2047, amelia.shister@usitc.gov)**.

The Commission is requesting information on the comparability of non-GMO CACCS and GMO CACCS.

V-1. **Comparability of GMO CACCS vs. non-GMO CACCS.**--For each of the following indicate whether non-GMO CACCS and GMO CACCS are: fully comparable or the same, *i.e.*, have no differentiation between them; mostly comparable or similar; somewhat comparable or similar; never or not-at-all comparable or similar; or no familiarity with products.

(a) **Characteristics and Uses.**--The differences and similarities in the physical characteristics and end uses for non-GMO CACCS versus GMO CACCS.

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their *characteristics and uses*:

(b) **Interchangeability.**--The ability to substitute non-GMO CACCS with GMO CACCS for the same application.

Fully interchangeable	Mostly interchangeable	Somewhat interchangeable	Not at all interchangeable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their *interchangeability*:

V-1. **Comparability of non-GMO CACCS vs. GMO CACCS.--Continued**

(c) **Manufacturing facilities, production processes, and production employees.--** Whether non-GMO CACCS and GMO CACCS are manufactured in the same facilities, from the same inputs, on the same machinery and equipment, and using the same employees.

Fully the same	Mostly the same	Somewhat the same	Not at all the same	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their manufacturing processes:

(d) **Channels of distribution.--**Channels of distribution/market situation through which non-GMO CACCS and GMO CACCS are sold (i.e., sold direct to end users, through distributors, etc.).

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their channels of distribution:

V-1. **Comparability of non-GMO CACCS vs. GMO CACCS.--Continued**

(e) **Customer and producer perceptions.**--Perceptions as to the differences and/or similarities in non-GMO CACCS versus GMO CACCS in the market (*e.g.*, sales/marketing practices).

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their customer and producer perceptions:

(f) **Price.**--Whether prices are comparable or differ for non-GMO CACCS and versus GMO CACCS.

Fully comparable	Mostly comparable	Somewhat comparable	Not at all comparable	NA/no familiarity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a narrative discussion for the comparability ratings you provided in terms of their prices:

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/investigations/701731/2017/citric_acid_and_certain_citrate_salts_belgium/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.

- **Upload via Secure Drop Box.**--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:** **CBCT**

- **E-mail.**--E-mail the MS Word questionnaire to amelia.shister@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 does not produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

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 (202-205-1803). 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.