

**LOST SALES AND LOST REVENUE SURVEY**  
**SODIUM GLUCONATE, GLUCONIC ACID, AND DERIVATIVE PRODUCTS FROM**  
**CHINA AND FRANCE**

This survey must be received by the Commission by **December 14, 2017**  
*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 and France (Inv. Nos. 701-TA-590 and 731-TA-1397-1398 (Preliminary)). 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 survey can be obtained from Caroline Peters (202-708-1443, [caroline.peters@usitc.gov](mailto:caroline.peters@usitc.gov)) or Cindy Cohen (202-205-3230, [cindy.cohen@usitc.gov](mailto:cindy.cohen@usitc.gov)).

Name of firm _____		
Address _____		
City _____	State _____	Zip Code _____
Website _____		
Has your firm purchased sodium gluconate (as defined on next page) at any time since January 1, 2014?		
<input type="checkbox"/> NO	(Sign the certification below and promptly return <b>only</b> this page of the survey to the Commission)	
<input type="checkbox"/> YES	(Complete all parts of the survey, and return the entire survey to the Commission)	
Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: <a href="https://dropbox.usitc.gov/oinv/">https://dropbox.usitc.gov/oinv/</a> . (PIN: <b>GNAP</b> )		

**CERTIFICATION**

*I certify that the information herein supplied in this survey 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 submitting this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this survey 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 investigation or other proceeding 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

**GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to a petition filed on November 30, 2017, by PMP Fermentation Products, Inc., Peoria, 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. U.S. producers of GNA products have provided the USITC with allegations about sales or revenue that they have lost due to competition from imports of GNA products from France and China. One or more domestic producer(s) have named your firm in such an allegation.

**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  $\text{NaC}_6\text{H}_{11}\text{O}_7$ ; gluconic acid has a molecular formula of  $\text{C}_6\text{H}_{12}\text{O}_7$ ; liquid gluconate is a blend of gluconic acid and sodium gluconate in an aqueous solution; and GDL has a molecular formula of  $\text{C}_6\text{H}_{10}\text{O}_6$ . 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.

**Reporting of information.**-- If information is not readily available from your records, provide carefully prepared estimates.

**Confidentiality.**--The data furnished in response to this survey 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.

**Release of information.**--The information provided by your firm in response to this survey, 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. Please also retain a copy of the final document that you submit.

**Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in this survey. This may or may not be the person whose signature is at the bottom of page 1.

Name	
Title	
Email	
Telephone	

**Firms operating more than one establishment should combine the data for all establishments into a single response.**

**PURCHASE INFORMATION**

1. **Purchases and imports.**--Report separately your firm’s domestic purchases and imports of GNA products.

**“Purchase”** – Purchase from a U.S. entity 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.

Item	2014	2015	2016	Jan-Sept 2017
	Quantity (in 1,000 dry pounds)			
<b>Purchases of GNA products produced in—</b>				
United States				
China				
France				
All other countries: <sup>1</sup>				
Sources unknown				
Total purchases	0	0	0	0
<b>Imports of GNA products from—</b>				
China				
France				
All other countries: <sup>1</sup>				
Total imports	0	0	0	0
<sup>1</sup> Please identify these countries:				

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, 2014.

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated	Explanation for trend
United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
France	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All other countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sources unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

3. **Major purchasing factors.**--Please list, in order of their importance, the main factors your firm considers in deciding from whom to purchase GNA products.

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

4. **Purchasing subject imports rather than domestic products.—**

(a) Since January 2014, did your firm purchase imports of GNA products from China and France instead of U.S.-produced GNA products? Respond for each subject country.

<b>Source</b>	<b>Yes (also respond to parts (b) and (c))</b>	<b>No (If “No” for all countries, skip to next question)</b>
China	<input type="checkbox"/>	<input type="checkbox"/>
France	<input type="checkbox"/>	<input type="checkbox"/>

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

<b>Source</b>	<b>Yes</b>	<b>No</b>
China	<input type="checkbox"/>	<input type="checkbox"/>
France	<input type="checkbox"/>	<input type="checkbox"/>

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

<b>Source</b>	<b>Yes</b>	<b>If Yes, estimate the quantity of imports purchased instead of domestic product since January 2014 (in 1,000 dry pounds)</b>	<b>No</b>	<b>If No, please indicate the reason your firm purchased imports instead of domestic product</b>
China	<input type="checkbox"/>		<input type="checkbox"/>	
France	<input type="checkbox"/>		<input type="checkbox"/>	

5. **U.S. producers and import competition.**—

(a) Since January 1, 2014, 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 the subject countries? Respond for each subject country.

Source	Yes (also respond to question part (b))	No (If “No” for all countries, skip to next question)	Don’t know
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
France	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) If your firm responded “yes” to any of the above countries, 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	%	
France	%	

6. **Method of purchase**--Please provide a general description of your firm’s method(s) of purchase (e.g., individual purchase, contract, bids, Internet purchases, etc.) for GNA products.

7. **Other explanations**--Please provide any additional comments in this box.

**OMB INFORMATION**

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

Hours	Dollars

The questions in this survey 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 survey is estimated to average 4 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the survey.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this survey. 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 SURVEY RESPONSE

***Please do not attempt to modify the format or permissions of the survey document.***

Please submit the completed survey using one of the methods noted below. If your firm is unable to complete the MS Word survey 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 survey 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/>
- **Enter Investigation:** Select “**INVESTIGATION-SPECIFIC MENU ITEM**” in the drop down menu
- **Pin:** **GNAP**

- **E-mail.**—E-mail the MS Word survey to [caroline.peters@usitc.gov](mailto:caroline.peters@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 did not purchase this product**, please fill out page 1, print, sign, and submit a scanned copy to the Commission.