U.S. PRODUCERS' QUESTIONNAIRE

PHOSPHATE FERTILIZERS FROM MOROCCO AND RUSSIA

This questionnaire must be received by the Commission by <u>December 29, 2020</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 investigations concerning phosphate fertilizers from Morocco and Russia (Inv. Nos. 701-TA-650-651 (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 fi	irm	
Address		
City	State Zip Code	
Website		
Has your fir	m produced phosphate fertilizers (as defined on next page) at any time since January 1, 2017?	
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)	
Return questionnaire via the U.S. International Trade Commission <i>Drop Box</i> by clicking on the following link: <u>https://dropbox.usitc.gov/oinv/</u> . (PIN: FERT)		

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 petitions filed on June 26, 2020, by The Mosaic Company, Plymouth, Minnesota. Countervailing 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. Questionnaires and other information pertinent to this proceeding are available at

https://usitc.gov/investigations/701731/2020/phosphate_fertilizers_morocco_and_russia/final.htm.

<u>Phosphate fertilizers</u> covered by these investigations is phosphate fertilizers in all physical forms (i.e., solid or liquid form), with or without coating or additives such as anti-caking agents. Phosphate fertilizers in solid form are covered whether granular, prilled (i.e., pelletized), or in other solid form (e.g., powdered).

The covered merchandise includes phosphate fertilizers in the following forms: ammonium dihydrogenorthophosphate or monoammonium phosphate (MAP), chemical formula NH4H2PO4; diammonium hydrogenorthophosphate or diammonium phosphate (DAP), chemical formula (NH4)2HPO4; normal superphosphate (NSP), also known as ordinary superphosphate or single superphosphate, chemical formula Ca(H2PO4)2·CaSO4; concentrated superphosphate, also known as double, treble, or triple superphosphate (TSP), chemical formula Ca(H2PO4)2·H2O; and proprietary formulations of MAP, DAP, NSP, and TSP.

The covered merchandise also includes other fertilizer formulations incorporating phosphorous and non-phosphorous plant nutrient components, whether chemically-bonded, granulated (e.g., when multiple components are incorporated into granules through, e.g., a slurry process), or compounded (e.g., when multiple components are compacted together under high pressure), including nitrogen, phosphate, sulfur (NPS) fertilizers, nitrogen, phosphorous, potassium (NPK) fertilizers, nitric phosphate (also known as nitrophosphate) fertilizers, ammoniated superphosphate fertilizers, and proprietary formulations thereof that may or may not include other nonphosphorous plant nutrient components. For phosphate fertilizers that contain nonphosphorous plant nutrient components, such as nitrogen, potassium, sulfur, zinc, or other nonphosphorous components, the entire article is covered, including the non-phosphorous content, provided that the phosphorous content (measured by available diphosphorous pentaoxide, chemical formula P2O5) is at least 5% by actual weight.

Phosphate fertilizers that are otherwise subject to this investigation are included when commingled (i.e., mixed or blended) with phosphate fertilizers from sources not subject to this investigation. Phosphate fertilizers that are otherwise subject to this investigation are included when commingled with substances other than phosphate fertilizers subject to this investigation (e.g., granules containing only non-phosphate fertilizers such as potash or urea). Only the subject component of such commingled products is covered by the scope of this investigation. The following products are specifically excluded from the scope of this investigation:

(1) ABC dry chemical powder preparations for fire extinguishers containing MAP or DAP in powdered form;

(2) industrial or technical grade MAP in white crystalline form with available P2O5 content of at least 60% by actual weight;

(3) industrial or technical grade diammonium phosphate in white crystalline form with available P2O5 content of at least 50% by actual weight;

(4) liquid ammonium polyphosphate fertilizers;

(5) dicalcium phosphate, chemical formula CaHPO4;

(6) monocalcium phosphate, chemical formula CaH4P2O8;

(7) trisodium phosphate, chemical formula Na3PO4;

(8) sodium tripolyphosphate, chemical formula Na5P3O10;

(9) prepared baking powders containing sodium bicarbonate and any form of phosphate;

(10) animal or vegetable fertilizers not containing phosphate fertilizers otherwise covered by the scope of this investigation;

(11) phosphoric acid, chemical formula H3PO4.

The Chemical Abstracts Service (CAS) numbers for covered phosphate fertilizers include, but are not limited to: 7722-76-1 (MAP); 7783-28-0 (DAP); and 65996-95-4 (TSP). The covered products may also be identified by Nitrogen-Phosphate-Potash composition, including but not limited to: NP 11-52-0 (MAP); NP 18-46-0 (DAP); and NP 0-46-0 (TSP).

The covered merchandise is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings 3103.11.0000; 3103.19.0000; 3105.20.0000; 3105.30.0000; 3105.40.0010; 3105.40.0050; 3105.51.0000; and 3105.59.0000 ("Primary HTS Statistical Reporting Numbers"). Phosphate fertilizers subject to this investigation may also enter under subheadings 3103.90.0010, 3105.10.0000, 3105.60.0000, 3105.90.0010, and 3105.90.0050. Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the scope is dispositive.

<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.

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. In addition, if your firm is a U.S. producer, the information you provide on your production and imports of phosphate fertilizers and your responses to the questions in Part I of the producer questionnaire will be provided to the U.S. Department of Commerce, upon its request, for use in connection with (and only in connection with) its requirement pursuant to section 702(c)(4)/732(c)(4) of the Act (19 U.S.C. § 1671a(c)(4)/1673a(c)(4)) to make a determination concerning

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the extent of industry support for the petition requesting this proceeding. Any information provided to Commerce will be transmitted under the confidentiality and release guidelines set forth above. Your response to these questions constitutes your consent that such information be provided to Commerce under the conditions described above.

D-GRIDS tool.--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (<u>https://www.usitc.gov/trade_remedy/question.htm</u>) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is <u>optional</u>. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool are available within the D-GRIDs tool itself.

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. <u>TAA information release</u>.--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, contact person's title, 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
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I-2a. <u>Establishments covered</u>.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. Firms operating more than one establishment should combine the data for all establishments into a single report.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>production</u> of phosphate fertilizers, 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 disc	¹ Additional discussion on establishments consolidated in this questionnaire:		

- I-2b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.
- I-2c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

I-3. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

No	Yes

I-4. <u>Petition support</u>.--Does your firm support or oppose the petition?

Country	Investigation type	Support	Oppose	Take no position
Morocco	Countervailing duty			
Russia	Countervailing duty			

- I-5. **Ownership**.--Is your firm owned, in whole or in part, by any other firm?
 - No Yes

Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

I-6. **<u>Related importers/exporters</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in importing phosphate fertilizers from Morocco or Russia into the United States or that are engaged in exporting phosphate fertilizers from Morocco or Russia to the United States?

No Yes--List the following information.

Country	Affiliation
	Country

- I-7. **<u>Related producers</u>**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of phosphate fertilizers?
 - 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 Calvin Chang (202-205-3062, <u>calvin.chang@usitc.gov</u>). **Supply all data requested on a** <u>calendar-year</u> basis.

II-1. <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 Part II.

Name	
Title	
Email	
Telephone	

II-2. **Changes in operations.--**Please indicate whether your firm has experienced any of the following changes in relation to the production of phosphate fertilizers since January 1, 2017.

(check as many as appropriate)	(If checked, please describe the nature, date(s), and significance of any such reported changes as well as the business reasons for them; leave completely blank if not applicable)
plant openings	
plant closings	
relocations	
expansions	
acquisitions	
consolidations	
prolonged shutdowns or production curtailments	
revised labor agreements	
weather / force majeure event(s)	
other (e.g., technology)	

- II-2b. **Distribution network.--**Please provide a description of your distribution network in the United States, including the location(s) of your warehouse(s) (whether owned or leased).
- II-2c. **COVID-19 pandemic.**—Since January 1, 2020, has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in relation to your firm's supply chain arrangements, production, employment, and sales relating to phosphate fertilizers?

No	Yes	If yes, describe these changes including a separate discussion of the (a) supply chain impact, (b) production and sales impact, and (c) employment impact of the COVID-19 pandemic.

II-3a. **Production using same machinery.--**Please report your firm's production of products using the same equipment, machinery, or employees as used to produce phosphate fertilizers, and the combined production capacity on this shared equipment, machinery, or employees 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 then the "overall production capacity" numbers reported in this question should be exactly equal to the "average production capacity" numbers reported in question II-7. If, however, your firm does produce out-of-scope merchandise using the same machinery and equipment as scope merchandise, then the "average production capacity" reported in question II-7 should exclude the portion of "overall production capacity" that was used to produce this out-of-scope merchandise.

"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 short tons)								
	C	Calendar year	January-Se	January-September				
Item	2017	2018	2019	2019	2020			
Overall production capacity ¹								
Production of: Phosphate fertilizers ²	0	0	0	0	0			
Other products ³								
Total production using same machinery or workers	0	0	0	0	0			
¹ Data reported for capacity (first line) s ² Data entered for production of phosp	-				-			

³ Please identify these products: _____.

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

Hours per week	Weeks per year

- II-3c. <u>Capacity calculation</u>.--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-4. <u>Product shifting</u>.—

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

No	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.

- (b) 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-5. **Tolling**.--Since January 1, 2017, has your firm been involved in a toll agreement regarding the production of phosphate fertilizers?

"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 yesPlease describe the toll arrangement(s) and name the firm(s) involved.

II-6. Foreign trade zones.--

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

"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 designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yesDescribe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).

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

No	Yes	If yesIdentify the firms and the FTZs.

II-7. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of phosphate fertilizers 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 <u>net values</u> (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. **Unless otherwise stated, report value in 1,000s of dollars.**

"Internal consumption/ including product shipped to own firm's retail establishments"--Product consumed internally by your firm, which includes merchandise that your firm transferred to your own firm's retail establishments (i.e., shipped to either a bricks-and-mortar store or to an online order fulfillment center). Such transactions are to be valued at fair market value and <u>not</u> the total value of final downstream processed merchandise in the case of internal consumption, <u>nor</u> the retail sale value in the case of your firm owning and operating its own retail establishments or using a third-party fulfillment center to place retail level sales.

"Transfers to related firms" –Shipments made to related firms. Such transactions are valued at fair market value.

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

"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-7. Production, shipment, and inventory data.--Continued

	C	alendar year	January-Se	January-September	
Item	2017	2018	2019	2019	2020
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories ² (quantity) (B)	0	0	0	0	C
Production (quantity) (C)					
U.S. shipments: Commercial shipments: Quantity (D)					
Value (E)					
Internal consumption / including product shipped to your firm's retail establishments: ³ <i>Quantity</i> (F)					
Value ³ (G)					
Transfers to related firms: ³ <i>Quantity</i> (H)					
Value ³ (I)					
Export shipments: ⁴ Quantity (J)					
Value (K)					
End-of-period inventories ² (quantity) (L)	0	0	0	0	C
¹ The production capacity reported is based o methodology used to calculate production capac ² BOP and EOP inventories reported here will ³ Internal consumption and transfers to relate basis for valuing these transactions in your record	city, and explain populate once re ed firms must be	any changes in r eported in quest valued at fair ma	eported capaci ion II-8a below arket value. If y	ty our firm uses a	

basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, *etc*.): _____. However, the data provided above in this table should be based on fair market value.

⁴ Identify your firm's principal export markets: ______.

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY</u>.--Generally, the data reported for the end-ofperiod inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). 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.

	Calendar year			January-September	
Reconciliation	2017	2018	2019	2019	2020
B + C - D - F - H - J - L = should equal					
zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above	are returning v	alues other that	$rac{1}{2}$	but are noneth	مامدد

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

II-8a. **Quarterly inventory levels.--**Report your firm's U.S. inventories (i.e., inventories physically held in the United States) of your firm's U.S.-produced phosphate fertilizers on each of the specified days (or nearest day).

Inventories as of (or nearest available date)	Quantity (in short tons)
December 31, 2016	
March 31, 2017	
June 30, 2017	
September 30, 2017	
December 31, 2017	
March 31, 2018	
June 30, 2018	
September 30, 2018	
December 31, 2018	
March 31, 2019	
June 30, 2019	
September 30, 2019	
December 31, 2019	
March 31, 2020	
June 30, 2020	
September 30, 2020	

II-8b. **Description of inventory trends.--**Please explain the information reported in part "a" of this question in term of major factors impacting trends, cyclicality or other technical observations relating to the reported inventory level by your firm.

II-9. **Channels of distribution**.--Report your firm's U.S. shipments (i.e. inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution.

Quantity (in short tons)							
	Calendar year			January-September			
Item	2017	2018	2019	2019	2020		
Channels of distribution: U.S. shipments: To distributors/wholesalers (M)							
To retailers (N)							
To end users (O)							

<u>RECONCILIATION OF CHANNELS</u>.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "O"), the data reported must be revised prior to submission to the Commission.

	Calendar year January-Septemb			eptember	
Reconciliation	2017	2018	2019	2019	2020
M + N + O – D – F – H = zero ("0"), if not					
revise.	0	0	0	0	0

II-10. <u>U.S. shipments by type</u>.--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of phosphate fertilizers by product type in the specified period.

Quantity (<i>in short tons</i>); value (<i>in \$1,000</i>)						
	Calendar year			January-September		
U.S. shipments	2017	2018	2019	2019	2020	
MAP:						
Quantity (P)						
Value (Q)						
DAP:						
Quantity (R)						
Value (S)						
TSP:						
Quantity (T)						
Value (U)						
NPS:						
Quantity (V)						
Value (W)						
NSP:						
Quantity (X)						
Value (Y)						
Other:1						
Quantity (Z)						
Value (AA)						
¹ Please describe these pr	oducts: <u>.</u>			•		

<u>RECONCILIATION OF U.S. SHIPMENTS</u>.--Please ensure that the quantity and value reported for U.S. shipments in this question (i.e., lines P through AA) in each time period equal the quantity reported for U.S. shipments in question II-7 (i.e., lines D through I) 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.

	Calendar year			January-September	
Reconciliation	2017	2018	2019	2019	2020
Quantity: $P + R + T + V + X + Z - D - F - H = zero ("0"), if not revise.$	0	0	0	0	0
Value: Q + S + U + W + Y + AA – E – G –					
I = zero ("0"), if not revise.	0	0	0	0	0

II-11. <u>Employment data</u>.--Report your firm's employment-related data related to the production of phosphate fertilizers and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) includes 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.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods, regardless of whether the interim periods are Jan-Mar (Q1), Jan-June (Q1+Q2), or Jan-Sept (Q1+Q2+Q3)."

"Hours worked" includes 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.

	Calendar year		January-September		
Item	2017	2018	2019	2019	2020
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (in \$1,000)					

Explanation of trends:

II-12. <u>Related firms</u>.--If your firm reported transfers to related firms in question II-7, please identify the firm(s) and 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-13. <u>Purchases</u>.--Has your firm purchased phosphate fertilizers produced in the United States or in other countries since January 1, 2017? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

"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.

"Import" –A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yesReport such purchases in the table below and explain the reasons for your firms' purchases.

Note: If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below

(Quantity in short tons)					
	Calendar year			January-September	
Item	2017 2018		2019	2019	2020
Purchases from U.S. importers ¹ of phosphate fertilizers from— Morocco					
Russia					
Saudi Arabia					
All other sources					
Purchases from domestic producers ²					
Purchases from other sources ³					
¹ Please list the name of the importer(s suppliers differ by source, please identify t ² Please list the name of the U.S. produ	he source for	each listed sup	plier:		

³ Please list the name of the firm(s) from which your firm purchased this product:

II-14. Imports.--Since January 1, 2017, has your firm imported phosphate fertilizers?

No	Yes	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

II-15. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Emily Kim (202-205-1800, <u>Emily.kim@usitc.gov</u>). **Supply all data requested on a <u>calendar-year</u> basis.**

III-1. <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 Part III.

Name	
Title	
Email	
Telephone	

- III-2. <u>Accounting system</u>.—Please provide the following information on 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:

Note.—Regardless of your firm's fiscal year, please report financial data on a calendar year basis.

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include phosphate fertilizers:
 - Does your firm prepare profit/loss statements for phosphate fertilizers:
 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, 10 Qs, Monthly, quarterly, semi-annually, annually
 - Accounting basis: U.S. GAAP, IFRS, Cash, Accounting basis: U.S. GAAP, Accounting 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 phosphate fertilizers, as well as specific statements and worksheets) used to compile these data.

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

- III-4. <u>Allocation basis</u>.--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 phosphate fertilizers and provide the share of net sales accounted for by these products in your firm's most recent calendar year.

Products	Share of sales
	0/
Phosphate fertilizers	%
	%
	%
	%
	%

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

YesContinue to question III-7	No—Skip to question III-9a.

III-7a. Inputs from related suppliers detailed.--Please identify the inputs used in the production of phosphate fertilizers 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 your most recently completed calendar year. 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
Input valuation as recorded i	n the firm's accounting books and reco	rds

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

Yes	No	If noIn the space below, please report the valuation basis of inputs purchased from related suppliers as reported in question III-9a.

III-8. <u>By-product</u>.—State how your firm classifies revenues from the sales of phosphogypsum, fluosilicic acid, sulphuric acid, phosphoric acid, and other products produced during the course of producing phosphate fertilizer as: Co-Product or By-Product

If your answer is "By-Product", report the revenues associated with the sale or transfer of such by-products for your firm's three most recently completed fiscal years, and for the specified interim periods. Note: the data provided below will appear in question III-9a as a reduction to COGS

Value (<i>in dollars</i>)				
Fiscal years Januar		January-S	y-September	
2017	2018	2019	2019	2020
By-product sales revenue ¹				
		Fiscal years	Fiscal years	Fiscal years January-S

¹ Please describe how your firm classifies these by-product revenues in the normal course of business (e.g., included in net sales values, as a reduction to COGS, included in "all other income").

III-9a. Operations on phosphate fertilizers.--Report the revenue and related cost information requested below on the phosphate fertilizers 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. Provide data for your firm's three most recently completed calendar year, and for the specified interim periods. If your firm was involved in tolling operations (either as the toller or as the tollee), please contact Emily Kim at (202) 205-1800 before completing this section of the questionnaire.

Quantity (in short tons) a	nd value (<i>in \$1</i>	,000)		
	C	alendar year		January-Se	eptember
Item	2017	2018	2019	2019	2020
Net sales quantities: ² Commercial sales ("CS")					
Internal consumption ("IC")					
Transfers to related firms ("Transfers")					
Total net sales quantities	0	0	0	0	0
Net sales values: ² Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
Cost of goods sold (COGS): ³ Raw materials					
Direct labor					
Other factory costs					
Less: by-product revenue	0	0	0	0	0
Total COGS	0	0	0	0	0
Gross profit or (loss)	0	0	0	0	0
Selling, general, and administrative (SG&A) expenses					
Operating income (loss)	0	0	0	0	0
Other expenses and income: Interest expense					
All other expense and income items, net ⁴					
Net income or (loss) before income taxes	0	0	0	0	0
Depreciation/amortization included above					
1 Include only sales (whether domestic or export)	and casts relates				

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>.

⁴ If the total reported amount is net other expenses, report as a positive number. If the total reported amount is net other income, report as a negative number. Please check the calculated "Net income or (loss) before income taxes" to ensure proper reporting of these items.

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

III-9b. <u>Financial data reconciliation</u>.--The calculable line items from question III-9a (i.e., total net sales quantities and values, total COGS, gross profit (or loss), operating income (or loss), 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	Νο	If noIf 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 negativeinstances 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-9c. **Raw materials**.--Report the share of total raw material costs in 2019 (reported in III-9a) for the following raw material inputs:

		Procureme	ent method	
Input	Share of total raw material costs (<i>percent</i>)	Primarily produced by your firm	Primarily purchased by your firm	
Phosphate rock				
Sulfur				
Ammonia				
Other material inputs ¹				
Total (should sum to 100 percent)	0.0			
¹ Please indicate any other notable "other" raw materials not expressly identified above and provide the share of the total raw material costs that they account for:				

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 year		January-S	eptember
Item	2017	2018	2019	2019	2020
			Value (<i>in \$1,000</i>)		
Nonrecurring item 1					
Nonrecurring item 2					
Nonrecurring item 3					
Nonrecurring item 4					
Nonrecurring item 5					
Nonrecurring item 6					
Nonrecurring item 7					

Nonrecurring item: In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a where the nonrecurring item is classified.

	Description and detailed explanation of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

- III-11. <u>Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company</u>.--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-12a. <u>Asset values</u>.--Report the <u>total</u> assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of phosphate fertilizers. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for phosphate fertilizers 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. Provide data as of the end of your firm's three most recently completed calendar year.

Note: Total assets should reflect <u>net assets</u> after any accumulated depreciation and allowances deducted. Total assets should be <u>allocated to the subject products</u> if these assets are also related to other products.

Value (<i>in \$1,000</i>)				
	Calendar year			
Item	2017	2018	2019	
Total assets (net)				

- III-12b. <u>Description of reported assets</u>.--Describe the main asset categories (both current and long-term assets) in the above response. 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.
- III-13a. Capital expenditures and research and development expenses.--Report your firm's capital expenditures and research and development ("R&D") expenses for phosphate fertilizers. Provide data for your firm's three most recently completed calendar year, and for the specified interim periods.

Value (<i>in \$1,000</i>)					
	Calendar year January-September			eptember	
Item	2017	2018	2019	2019	2020
Capital expenditures					
R&D expenses					

- III-13b. <u>Description of reported capital expenditures</u>.-- Describe the nature, focus, and significance of your firm's reported capital expenditures. If no capital expenditure data were reported, explain the reason.
- III-13c. <u>Description of reported R&D expenses</u>.-- Describe the nature, focus, and significance of your firm's reported R&D expenses. If no R&D expenses were reported, explain the reason.
- III-14. **Data consistency and reconciliation.--** Please note that we are requesting your firm's financial data for questions III-9, III-12a, and III-13a on a calendar year basis. Please confirm that your firm reported these data on a calendar-year basis:

Yes	No	If no, please explain.

Please note the quantities and values reported in question III-9a should reconcile with the data reported in question II-7 (including export shipments) as long as they are reported on the same calendar year basis.

<u>RECONCILIATION OF TRADE VS FINANCIAL DATA</u>.--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") and both are being reported on a calendar basis, please explain the discrepancy below.

		Calendar year			January-September		
Reconciliation	2017	2018	2019	2019	2020		
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	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	0	0		

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

Yes	No	If no, please explain.

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. <u>Effects of imports on investment</u>.--Since January 1, 2017, 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 phosphate fertilizers from Morocco or Russia?

No	Yes	
		If yes, my firm has experienced actual negative effects as follows.

(ch	eck as many as appropriate)	(please describe)
	Cancellation, postponement, or rejection of expansion projects	
	Denial or rejection of investment proposal	
	Reduction in the size of capital investments	
	Return on specific investments negatively impacted	
	Other	

III-16. <u>Effects of imports on growth and development</u>.--Since January 1, 2017, 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 phosphate fertilizers from Morocco or Russia?

No	Yes	
		If yes, my firm has experienced actual negative effects as follows.

(check	as many as appropriate)	(please describe)
	Rejection of bank loans	
	Lowering of credit rating	
	Problem related to the issue of stocks or bonds	
	Ability to service debt	
	Other	

III-17. <u>Anticipated effects of imports</u>.--Does your firm anticipate any negative effects due to imports of phosphate fertilizers from Morocco or Russia?

No	Yes	If yes, my firm anticipates negative effects as follows.

III-18. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Andrew Knipe (202-205-2390, <u>Andrew.Knipe@usitc.gov</u>).

IV-1. **<u>Contact information</u>**.--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 monthly quantity and value data for your firm's bulk commercial shipments to unrelated U.S. agricultural customers since January 1, 2017 of the following products produced by your firm:
 - **Product 1.--**Standard-grade monoammonium phosphate (MAP), chemical formula NH₄H₂PO₄, granular, excluding high-purity MAP. Barge-loaded, U.S. point of shipment NOLA.
 - **Product 2.-**-Standard-grade diammonium phosphate (DAP), chemical formula (NH₄)₂(HPO₄), granular. Barge-loaded, U.S. point of shipment NOLA.

Please report only barge shipments of MAP and DAP sold to arm's-length agricultural sector customers (exclude industrial or feed sector shipments).

Values should be f.o.b. NOLA and should not include U.S. inland transportation costs from the NOLA port. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts, rebates, or other allowances). If rebates are paid retroactively based on sales volume targets, base these deductions on estimates of rebates based on historical experience with customers.

IV-2a. During January 2017-September 2020, did your firm produce and sell in bulk to unrelated U.S. agricultural customers any of the above listed products?

YesPlease complete the following pricing data table as appropriate.
No.—Please explain below. Then skip to question IV-3.

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

	Product 1	l (MAP)	Product 2 (DAP)	
Period of shipment	Quantity	Value	Quantity	Value
2017:				
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				
2018:				
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				

Report data in *short tons* and *actual dollars* (not 1,000s).

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. NOLA. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred.
² Pricing product definitions are provided on the first page of Part IV.

See note on next page.

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

	Product 1	L (MAP)	Product 2 (DAP)	
Period of shipment	Quantity	Value	Quantity	Value
2019:				
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				
2020:				
January				
February				
March				
April				
May				
June				
July				
August				
September				

Report data in *short tons* and *actual dollars* (not 1,000s).

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:

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

Are the price data reported above:		
In actual dollars (<i>not</i> \$1,000) and short tons?		
F.o.b. U.S. point of shipment NOLA?		
Net of all discounts and rebates?		
Have discounts, rebates, and returns been credited to the month in which the sale occurred?		
Include only agricultural sector sales?		
Quantities do not exceed commercial shipments in question II-7 in each year?		
Explanation(s) for any boxes not checked:		

IV-2d. Pricing data rebates.--Does your firm give rebates to customers based on annual sales volume or based on any other product or service sold by your firm? If yes, please describe how such rebates were applied in your reported pricing data and indicate the average unit values of rebates excluded from pricing product values for 2019.

		Describe how rebates applied in	Average rebates excluded from pricing data, 2019 (dollars per short ton)		
No	Yes		МАР	DAP	

IV-2e. **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.

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IV-3. Price setting.—

(a) How does your firm determine the prices that it charges for sales of phosphate fertilizers (*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

(b) Does your firm refer to prices published in trade publications (e.g., Argus, CRU, Green Markets) in determining selling prices for phosphate fertilizers?

No	Yes	If yes, please describe how your firm's price indexing works including: 1. trade publications referenced, 2. formulas used, 3. whether formulas differ by customer, 4. whether prices can change between shipment and delivery, and 5. approximate percent of sales with price indexing.

(c) Since January 1, 2017, has your firm reported pricing data to any trade publication indices?

No	Yes	If yes, please identify the indices.

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	Rebates	Other	Describe

If your firm provides rebates to customers for phosphate fertilizer sales, please explain how rebates are determined and when they are paid to the customer. _____

IV-5. **Pricing terms.--**On what basis are your firm's prices of domestic phosphate fertilizers usually quoted (*check one*)?

Delivered	F.o.b.	If f.o.b., specify point

IV-6. Contract versus spot.--Approximately what share of your firm's sales of its U.S.-produced phosphate fertilizers in 2019 was on a (1) short-term contract basis, (2) annual contract basis, (3) long-term contract basis, and (4) spot sales basis?

	Type of sale					
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)	Spot sales (for a single delivery)	Tota l (shoul sum to 100.0%	d o
Share of 2019 sales	%	%	%	%	0.0	%

IV-7. <u>Contract provisions</u>.--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced phosphate fertilizers (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	ltem	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 No. of duration days			365	
Price renegotiation	Yes			
(during contract period)	No			
	Quantity			
Fixed quantity and/or price	Price			
	Both			
Indexed to raw	Yes			
material costs ¹	No			
Not applicable				
¹ Please identify the in	dexes used:	·		

IV-8. <u>Lead times</u>.--What share of your firm's sales is 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 phosphate fertilizers?

Source	Share of 2019 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
Total (should sum to 100.0%)	0.0 %	

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IV-9. Shipping information.--

- (a) Who generally arranges the transportation to your firm's customers' locations? Your firm Purchaser (check one)
- (b) Indicate the approximate percentage of your firm's sales of phosphate fertilizers 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. <u>Geographical shipments</u>.--In which U.S. geographic market area(s) has your firm sold its U.S.produced phosphate fertilizers since January 1, 2017 (check all that apply)?

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

IV-11. Inland transportation modes and costs.-

(a) Please report the share of your U.S.-produced phosphate fertilizer sales in 2019 that were shipped by each of the following modes.

Transport mode	Share of 2019 sales
Barge	%
Rail	%
Truck	%
Other (specify)	%
Total (should sum to 100.0%)	0.0 %

(b) For each mode for which your firm reported sales above, report the approximate percentage of the cost of your U.S.-produced phosphate fertilizers in 2019 that was accounted for by U.S. inland transportation costs.

Transport mode	Transport cost share
Barge	%
Rail	%
Truck	%
Other (specify)	%

IV-12. <u>Substitutes</u>.--Can other products be substituted for phosphate fertilizers?

🗌 No

Yes--Please fill out the table.

	End use in which this		Have changes in the price of this substitue affected the price for phosphate fertilized		
	Substitute	substitute is used	No	Yes	Explanation
1.					
2.					
3.					

IV-13. <u>Demand trends</u>.--Indicate how demand within the United States and outside of the United States (if known) for phosphate fertilizers has changed since January 1, 2017. Explain any trends (including the time period) and describe the principal factors (such as weather) 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					
Outside the United States					

IV-14. **Product changes.--**Have there been any significant changes in the product range, product mix, or marketing of phosphate fertilizers since January 1, 2017?

No	Yes	f yes, please describe and quantify if possible.	

IV-15. Conditions of competition.--

(a) Is the phosphate fertilizers market subject to business cycles and/or other conditions of competition distinctive to phosphate fertilizers? If yes, describe.

Check all that apply.		Please describe.
	No	Skip to question IV-16.
	Yes-Business cycles (e.g. seasonal business)	
	Yes-Other distinctive conditions of competition	

(b) If yes, have there been any changes in the business cycles or conditions of competition for phosphate fertilizers since January 1, 2017?

No	Yes	If yes, describe.

IV-16. Supply constraints.--Has your firm refused, declined, or been unable to supply phosphate fertilizers since January 1, 2017 (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	If yes, please describe, including the customers involved, the time period, and the reason(s) for the supply constraint (including weather-related issues, plant closures, and/or idling or curtailment of production facilities).

IV-17. **<u>Raw materials</u>.--**How have phosphate fertilizers raw material prices changed since January 1, 2017?

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 phosphate fertilizers.

IV-18. <u>Interchangeability</u>.--Is phosphate fertilizers 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	Morocco	Russia	Saudi Arabia	Other countries
United States				
Morocco				
Russia				
Saudi Arabia				
		.		

For any country-pair producing phosphate fertilizers that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude interchangeable use:

IV-19. Factors other than price.--Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, etc.) between phosphate fertilizers 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 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	Morocco	Russia	Saudi Arabia	Other countries		
United States						
Morocco						
Russia						
Saudi Arabia						
For any country-pair for which factors other than price <i>always</i> or <i>frequently</i> are a significant factor in your firm's sales of phosphate fertilizers, identify the country-pair and report the advantages or disadvantages imparted by such factors:						

IV-20. <u>Customer identification</u>.--List the names and contact information for your firm's 10 largest U.S. customers for phosphate fertilizers since January 1, 2017. Indicate the share of the quantity of your firm's total shipments of phosphate fertilizers that each of these customers accounted for in 2019.

	Customer's name	City	State	Share of 2019 sales (%)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

IV-21. Competition from imports.--

(a) <u>Lost revenue</u>.--Since January 1, 2017: To avoid losing sales to competitors selling phosphate fertilizers from Morocco or Russia, did your firm:

Item	No	Yes
Reduce prices		
Roll back announced price increases		

(b) Lost sales.--Since January 1, 2017: Did your firm lose sales of phosphate fertilizers to imports of this product from Morocco or Russia?

No	Yes

IV-22. <u>Other explanations</u>.--If your firm would like to further explain a response to a question in Part IV for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

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/701731/2020/phosphate_fertilizers_morocco_and_russ ia/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: FERT

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