BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE
AND THE UNITED STATES INTERNATIONAL TRADE COMMISSION

IN THE MATTER OF

CERTAIN UNCOATED PAPER FROM
AUSTRALIA, BRAZIL, THE PEOPLE’S
REPUBLIC OF CHINA, INDONESIA,
AND PORTUGAL

PETITIONS FOR THE IMPOSITION
OF ANTIDUMPING AND
COUNTERVAILING DUTIES
VOLUME I: GENERAL
INFORMATION AND INJURY

PETITIONERS:
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and
Service Workers International Union; Domtar Corporation; Finch Paper LLC;
P.H. Glatfelter Company; and Packaging Corporation of America

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# TABLE OF CONTENTS

LIST OF EXHIBITS ........................................................................................................ iv

I. INTRODUCTION ........................................................................................................ 1

II. GENERAL INFORMATION ....................................................................................... 1

A. The Petitioners ..................................................................................................... 1

B. Description Of The Domestic Industry ................................................................. 2

C. Degree Of Industry Support For The Petition .................................................... 2

D. Previous Requests For Import Relief For The Merchandise ....................... 4

E. Detailed Description Of The Subject Merchandise ........................................ 4

1. Physical characteristics, specifications, and uses ............................................. 4

2. U.S. tariff classification numbers ................................................................. 6

3. Production methods ..................................................................................... 8

4. Proposed scope of investigation .................................................................. 9

F. Class Or Kind Of Merchandise And Domestic Like Product .................... 10

G. Countries Of Exportation ............................................................................. 11

H. Producers And Exporters Of Subject Merchandise .................................. 11

I. Names, Addresses, And Phone Numbers Of Importers Of Subject Merchandise 11

J. Proposed Products For Collection Of Pricing Information .......................... 12

III. THE DOMESTIC LIKE PRODUCT AND INDUSTRY DEFINITIONS ............ 12

A. The Domestic Like Product Is Certain Uncoated Paper ............................... 12

1. Physical characteristics and end uses .......................................................... 13

2. Interchangeability ....................................................................................... 16

3. Channels of distribution ........................................................................... 17

4. Customer and producer perceptions .......................................................... 18
5. Common manufacturing facilities, production processes, and production employees .................................................. 20

6. Price .................................................................................. 21

B. U.S. Producers Of Certain Uncoated Paper Constitute The Domestic Industry... 22

IV. CUMULATION AND NEGLIGENCE........................................... 22

A. The Subject Imports Should Be Cumulated............................................... 22

1. Certain Uncoated Paper is highly interchangeable, regardless of source. 22

2. There is a high degree of geographic market overlap, and subject imports were sold in the U.S. market throughout the period of investigation .................................................. 23

3. The channels of trade are the same .............................................. 23

B. Subject Imports Are Not Negligible ........................................... 23

V. THE DOMESTIC INDUSTRY IS MATERIALLY INJURED BY REASON OF SUBJECT IMPORTS ........................................ 24

A. Conditions Of Competition ..................................................... 24

1. Certain Uncoated Paper is a commodity-like product that competes on the basis of price .................................................. 24

2. Demand for Certain Uncoated Paper is declining ....................... 24

3. Production of Certain Uncoated Paper is capital intensive .......... 25

B. The Volume Of Subject Imports And The Increase In The Volume Of Subject Imports Are Significant................................. 25

C. Subject Imports Are Causing Negative Price Effects ................... 28

1. Certain Uncoated Paper is a price-sensitive product .................. 28

2. Subject imports have undersold the domestic like product by significant margins .................................................. 28

3. Subject imports significantly depressed and suppressed prices for the domestic like product .............................. 29

4. Lost sales and lost revenues ............................................... 30

-I-ii-
D. Subject Imports Have Had An Adverse Impact On The Domestic Industry ....... 30
   1. Mill closures................................................................. 30
   2. Trade data................................................................. 32
   3. Financial data.............................................................. 32

VI. SUBJECT IMPORTS THREATEN TO CAUSE FURTHER MATERIAL INJURY..... 33
   A. Subject Imports Should Be Cumulated In Assessing Threat Of Material Injury . 33
   B. Application Of The Statutory Factors Demonstrates Threat Of Further Material Injury
      .................................................................................. 34
         1. Subject imports are rapidly increasing........................................ 34
         2. Subject producers are expanding capacity and are highly export
            oriented with a focus on the U.S. market.................................... 34
         3. Chinese and Indonesian producers receive significant countervailable
            subsidies........................................................................ 41
         4. Subject imports are likely to depress or suppress U.S. prices for the
            domestic like product............................................................ 42
         5. The domestic industry is vulnerable to subject imports.................. 43

VII. CONCLUSION........................................................................... 43
LIST OF EXHIBITS

Exhibit I-1  Declaration of Jon Geenen (Public)
Exhibit I-2  U.S. Producers Of Certain Uncoated Paper (Public)
Exhibit I-3  Measurement Of Industry Support For Petitions Using Shipments Of Uncoated Freesheet In Sheets (2013) (BPI)
Exhibit I-4  Apparent U.S. Consumption Of Certain Uncoated Paper (BPI)
Exhibit I-5  RISI Global Outlook for Cut Size Uncoated Freesheet Paper Markets (Public)
Exhibit I-6  Harmonized Tariff Schedule of the United States (2014) – Excerpts (Public)
Exhibit I-7  Foreign Producers And Exporters Of Certain Uncoated Paper In Australia, Brazil, China, Indonesia, And Portugal (Public)
Exhibit I-8  Importers Of Certain Uncoated Paper From Australia, Brazil, China, Indonesia, And Portugal (Public)
Exhibit I-9  Price Difference Between Copy Paper And 50 Lb. Offset Paper In Rolls In The United States ($/ton) (Public)
Exhibit I-10  Subject Imports By District Of Entry And Unlading, 2011-2013 And January-September 2014 (Public)
Exhibit I-11  Subject Imports, By Month, 2011-2013 And January-September 2014 (Public)
Exhibit I-12  Subject Imports And All Other Imports By Month, December 2013-November 2014 (Public)
Exhibit I-13  Petitioning Producers’ Trade And Operations Data (BPI)
Exhibit I-14  RISI Pricing Data (Public)
Exhibit I-15  Petitioning Producers’ Financial Data (BPI)
Exhibit I-16  Lost Sales And Lost Revenue Information (BPI)
Exhibit I-17  Trade Adjustment Assistance Certifications (Public)
Exhibit I-20  “Make it Recycled’ partnership will boost recycled paper,” Australia Paper Press Release (Public)
PETITIONS FOR THE IMPOSITION OF ANTIDUMPING DUTIES ON IMPORTS OF CERTAIN UNCOATED PAPER FROM AUSTRALIA, BRAZIL, CHINA, INDONESIA, AND PORTUGAL AND COUNTERVAILING DUTIES ON IMPORTS FROM CHINA AND INDONESIA

I. INTRODUCTION

These petitions are filed on behalf of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("USW"), Domtar Corporation ("Domtar"), Finch Paper LLC ("Finch"), P.H. Glatfelter Company ("Glatfelter"), and Packaging Corporation of America ("PCA") ("Petitioners") seeking the imposition of antidumping duties on imports of Certain Uncoated Paper (as defined in the proposed scope of investigations) from Australia, Brazil, China, Indonesia, and Portugal and countervailing duties on imports of Certain Uncoated Paper from China and Indonesia.

Petitioners file these petitions before the International Trade Administration of the U.S. Department of Commerce (the "Department") and the U.S. International Trade Commission (the "ITC" or the "Commission") on behalf of the domestic industry producing Certain Uncoated Paper, pursuant to Sections 701 and 731 of the Tariff Act of 1930, as amended ("the Act"), 19 U.S.C. §§ 1671 and 1673. These petitions set forth the information reasonably available to Petitioners in support of these allegations.

II. GENERAL INFORMATION

A. The Petitioners

The USW represents workers employed in the U.S. mills of Domtar, Finch, Flambeau River Papers LLC, Georgia-Pacific LLC, International Paper, Glatfelter, PCA, Mohawk Fine Papers, Inc., and Neenah Papers, Inc. that produce Certain Uncoated Paper. The USW, therefore, is an interested party within the meaning of 19 U.S.C. § 1677(9)(D). The mills where USW members are employed are identified in Exhibit I-1. As shown in that exhibit, the USW

- I-1 -
represents workers employed by nine of the eleven U.S. companies that currently produce Certain Uncoated Paper. Based on the capacity to produce Certain Uncoated Paper at the mills operated by the nine companies where the USW has representation, the USW accounted for approximately 86.66 percent of the domestic industry’s capacity in 2013.

Domtar, Finch, Glatfelter, and PCA ("Petitioning Producers") produce Certain Uncoated Paper and are thus interested parties within the meaning of 19 U.S.C. § 1677(9)(C). The addresses and additional contact information for USW, Petitioning Producers, and other U.S. producers of Certain Uncoated Paper are provided in Exhibit I-2. As shown in Exhibit I-3, Petitioning Producers accounted for [ ] percent of the domestic industry’s U.S. shipments in 2013.

Certain Uncoated Paper includes only unprinted paper that is in finished sheet form (whether cut-size or folio) and that meets the brightness, basis weight, and other physical characteristics provided for in the scope definition.

B. Description Of The Domestic Industry

The domestic industry consists of all U.S. producers of Certain Uncoated Paper, the domestic like product.

C. Degree Of Industry Support For The Petition

Sections 702(c)(4)(A) and 732(c)(4)(A) of the Tariff Act of 1930, as amended (the Act), state that the administering authority shall determine that a petition has been filed by or on behalf of the industry if the domestic producers or workers who support the petition account for (1) at least 25 percent of the total production of the domestic like product and (2) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition.
Petitioners are filing these petitions on behalf of the domestic industry producing Certain Uncoated Paper. The Department typically determines whether there is sufficient industry support with reference to production over a 12-month period. Petitioners are unaware of any reasonably available public data source that reports on U.S. production of Certain Uncoated Paper for the U.S. industry as a whole. Petitioners note that the Department has accepted shipment data in lieu of production data where the petitioners in prior cases were able to establish that shipments were a reasonable proxy for production data to measure industry support.\(^1\) Shipment data for the U.S. industry as a whole is available from public sources for 2013.\(^2\) In order to determine the extent to which shipment data are a reasonable proxy for production data, Petitioners compared shipment data to production data for the four producers of Certain Uncoated Paper that are Petitioners. During each of the past three calendar years and January–September 2014, the Petitioning Producers’ total shipments of Certain Uncoated Paper equaled within [ ] percent of their total production of Certain Uncoated Paper.\(^3\)

Because Petitioning Producers’ total shipments of Certain Uncoated Paper closely approximate their production of Certain Uncoated Paper, shipments of Certain Uncoated Paper are a reasonable proxy for production.

The domestic industry’s U.S. shipments of the domestic like product totaled 4,168,100 short tons in 2013, based on data collected by the American Forest & Paper Association.

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\(^2\) See Exhibit I-3. Such data are not available for calendar year 2014.

\(^3\) See Exhibit I-4.
"AF&PA"). The Petitioning Producers accounted for [__] percent of the domestic industry’s U.S. shipments in 2013.\(^4\)

In addition, the USW represents workers employed in the mills of the following U.S. producers of Certain Uncoated Paper: Domtar, Finch, Flambeau River Papers LLC, Georgia-Pacific LLC, International Paper, Glatfelter, PCA, Mohawk Fine Papers, Inc., and Neenah Papers, Inc. Thus, the USW represents workers in nine of the eleven U.S. mills that currently produce Certain Uncoated Paper. Petitioners estimate that the USW represents workers in facilities accounting for 86.66 percent of U.S. capacity to produce Certain Uncoated Paper.\(^5\) Thus, Petitioners represented well over [__] percent of the domestic industry’s production in 2013.

D. Previous Requests For Import Relief For The Merchandise


E. Detailed Description Of The Subject Merchandise

1. Physical characteristics, specifications, and uses

Certain Uncoated Paper consists of uncoated paper in the form of finished sheets; weighing at least 40 grams per square meter ("gsm") but not more than 150 gsm; that either is a white paper with a GE brightness level of 85 or higher or is a colored paper; whether or not

\(^4\) See Exhibit I-3.

\(^5\) See Exhibit I-1.
surfacedecorated, printed (except as described below), embossed, perforated, or punched; irrespective of the smoothness of the surface; and irrespective of dimensions.

Certain Uncoated Paper produced in the United States is typically uncoated freesheet ("UFS") paper, that is, paper made primarily with chemical pulp or a combination of chemical and recycled pulp. UFS paper is sometimes known as uncoated woodfree paper ("UWF"). Producers in some other countries, including China and Indonesia, may produce some Certain Uncoated Paper from bleached chemi-thermomechanical pulp ("BCTMP"). BCTMP is considered a groundwood pulp, rather than a chemical pulp. Certain Uncoated Paper produced with BCTMP is indistinguishable from UFS and is substitutable for all the same end uses.

According to RISI, over 95 percent of Certain Uncoated Paper is sheeted by the paper manufacturer. Typically, independent converters only convert sheeter rolls for specialty cut size products such as those with perforations or punched holes or special size folio sheets. Therefore, only a very minor portion of Certain Uncoated Paper is sold in the form of sheeter rolls to independent converters who then convert the paper into finished sheets.

Certain Uncoated Paper is typically (but not exclusively) used for office reprographics (copy and printer paper), books, business forms, instruction manuals, inserts, flyers, brochures, and maps. Certain Uncoated Paper is used in office and home printers/copiers, as well as sheetfed printing presses, including but not limited to offset presses, digital color presses, color printers, and color copiers.

Certain Uncoated Paper consists of cut-size sheets and folio sheets. Cut-size sheets are produced in the following standard sizes: 8½ x 11 inches (letter size), 8½ x 14 inches (legal

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size), and 11 x 17 inches.\textsuperscript{7} Folio sheets have various dimensions and are larger than cut size sheets. According to the AF&PA, cut-size sheets account for over 90 percent of U.S. shipments of Certain Uncoated Paper. Letter and legal size sheets alone account for over 84 percent of U.S. shipments of Certain Uncoated Paper.\textsuperscript{8}

2. U.S. tariff classification numbers

Certain Uncoated Paper enters the United States under the following statistical reporting numbers of the Harmonized Tariff Schedule of the United States ("HTSUS")\textsuperscript{9}:

<table>
<thead>
<tr>
<th>HTSUS Number</th>
<th>Dimension</th>
<th>Weight</th>
<th>Other Specifics</th>
</tr>
</thead>
<tbody>
<tr>
<td>4802.56.1000</td>
<td>sheets with one side exceeding 360 mm and the other side exceeding 150 mm in the unfolded state, but not exceeding 435 mm on one side and/or 297 mm on the other side</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>writing and cover paper</td>
</tr>
<tr>
<td>4802.56.2000</td>
<td></td>
<td></td>
<td>drawing paper</td>
</tr>
<tr>
<td>4802.56.3000</td>
<td></td>
<td></td>
<td>India or bible paper</td>
</tr>
<tr>
<td>4802.56.4000</td>
<td></td>
<td></td>
<td>other</td>
</tr>
<tr>
<td>4802.56.6000</td>
<td>sheets with one side not exceeding 360 mm and/or the other side not exceeding 150 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Basic paper to be sensitized for use in photography</td>
</tr>
</tbody>
</table>

\textsuperscript{7} Outside the United States, where metric measurements are more predominant, typical cut-size sheets are A4 paper (210 x 297 mm, 8.3 x 11.7 inches) and A3 paper (297 x 420 mm, 11.7 x 16.5 inches).

\textsuperscript{8} American Forest & Paper Association, 2013 Uncoated Free Sheet Survey p. 4, provided in Exhibit I-3 (Attachment A).

\textsuperscript{9} Papers classified under HTSUS six-digit categories 4802.56 and 4802.57 are made from pulp that does not contain more than 10 percent mechanical and chemi-mechanical pulp. Papers classified under HTSUS six-digit categories 4802.62 and 4802.69 are made from pulp that contains 10 percent or more mechanical and chemi-mechanical pulp. Substantially all Certain Uncoated Paper enters the United States under HTS categories 4802.56 and 4802.57. Exhibit I-6 contains the relevant pages from the HTSUS.
<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Weight</th>
<th>Other Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>4802.56.7020</td>
<td>sheets with one side not exceeding 360 mm and/or the other side not exceeding 150 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Containing by weight 25 percent or more cotton fiber</td>
</tr>
<tr>
<td>4802.56.7040</td>
<td>sheets with one side not exceeding 360 mm and/or the other side not exceeding 150 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Other</td>
</tr>
<tr>
<td>4802.57.1000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Writing and cover paper</td>
</tr>
<tr>
<td>4802.57.2000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>writing and cover paper</td>
<td>Drawing paper</td>
</tr>
<tr>
<td>4802.57.3000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>writing and cover paper</td>
<td>India or bible paper</td>
</tr>
<tr>
<td>4802.57.4000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>writing and cover paper</td>
<td>Other</td>
</tr>
<tr>
<td>4802.62.1000</td>
<td>sheets with one side exceeding 360 mm and/or the other side exceeding 150 mm</td>
<td>writing and cover paper</td>
<td>Drawing paper</td>
</tr>
<tr>
<td>4802.62.2000</td>
<td>sheets with one side exceeding 360 mm and/or the other side exceeding 150 mm in the unfolded state, but not exceeding 435 mm on one side and/or 297 mm on the other side</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Other</td>
</tr>
<tr>
<td>4802.62.3000</td>
<td>sheets with one side exceeding 360 mm and/or the other side exceeding 150 mm in the unfolded state, but not exceeding 435 mm on one side and/or 297 mm on the other side</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Other</td>
</tr>
<tr>
<td>4802.62.5000</td>
<td>sheets with one side not exceeding 360 mm and/or the other side not exceeding 150 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Basic paper to be sensitized for use in photography</td>
</tr>
<tr>
<td>4802.62.6020</td>
<td>sheets with one side not exceeding 360 mm and/or the other side not exceeding 150 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Containing by weight 25 percent or more cotton fiber</td>
</tr>
<tr>
<td>4802.62.6040</td>
<td>sheets with one side not exceeding 360 mm and/or the other side not exceeding 150 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Other</td>
</tr>
<tr>
<td>4802.69.1000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Writing and cover paper</td>
</tr>
<tr>
<td>4802.69.2000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Drawing paper</td>
</tr>
<tr>
<td>4802.69.3000</td>
<td>sheets with one side exceeding 435 mm and/or the other side exceeding 297 mm</td>
<td>weighing 40 gsm or more but not more than 150 gsm</td>
<td>Other</td>
</tr>
</tbody>
</table>
3. Production methods

Many of the production facilities of the domestic industry are integrated operations which produce both pulp and paper. Sheeting and packaging of the final paper product occurs off-line in separate sheeting facilities which can be located at the paper mill or off site.\textsuperscript{10}

The manufacturing process begins with the removal of the bark from the hardwood and softwood logs in a debarking machine. The logs are then chipped into small uniformly sized chips in a chipper. The wood chips next undergo a chemical pulping process whereby they are cooked under pressure with water and chemicals in a digester cooking vessel to separate the cellulose fibers from the lignin, the glue that holds the fibers together, and other impurities. The resulting wood pulp is washed and bleached to attain a level of whiteness and brightness required for the grade of paper being produced and then refined to enable the wood fibers to mesh together and to increase their bonding properties. The paper is made from both hardwood pulp and softwood pulp. The short hardwood fibers help to provide a good printing surface, while the longer softwood fibers provide strength to the sheet. Different materials are added to the pulp, including kaolin clay and calcium carbonate for brightness, opacity, and smoothness; dyes for shade control; optical brighteners for whiteness; and sizing agents for moisture control. The exact proportions of these materials are determined by the specifications for the particular type of paper that is being produced. A large volume of water is also added.

At this stage of the manufacturing process, the pulp mixture is 99.5 percent water and is ready to be run continuously through a paper machine. A paper machine has three major parts – the base sheet forming section (the wet end), the press section, and the dryer section. The

\textsuperscript{10} Some U.S. producers also repulp recycled paper and use this recycled pulp, solely or in combination with virgin pulp, in the production of some their paper. Other companies may also purchase chemical pulp or bleached chemi-thermomechanical pulp (discussed below) on the open market to supplement their own pulp production.
mixture is pumped out onto a continuously moving wire web that is usually oriented horizontally and which loops around rollers at both ends. As the wire web moves along, water drains through it, the fibers begin to bond, and a sheet (web) of paper begins to form on the wire. The web at this point has an 80 percent water content. The web of paper leaves the moving wire and enters the press section, where steel rollers squeeze more water out of the web, reducing its water content to about 65 percent. The web then proceeds into the dryer section and passes over and under successive steam-heated drying cylinders. This drying process removes most of the remaining water from the web of paper.

At the end of the paper machine, the large reels of paper (known as “parent rolls”) are typically cut to the appropriate width for the sheeters. The various widths of these narrower “sheeter rolls” are dictated by the sheet sizes into which they will be cut in order to minimize waste in the sheeting process. Sheeter rolls typically have diameters of at least 50 inches and widths of 52 to 103 inches, which are efficient sizes for cutting standard 8.5 inch wide letter and legal size sheets. The sheeter rolls are processed on a sheeting and packaging production line, which slits the rolls to the desired width (typically 8.5 inches), cuts the rolls into sheets, performs a quality check on the surface of the paper, removes defective sheets, counts and packages the sheets in ream quantities, places them in cartons, and stacks them on pallets ready for delivery.

4. Proposed scope of investigation

Petitioners propose the following scope for these investigations:

The merchandise covered by this investigation includes certain paper in sheet form that has not been coated on either side; weighing at least 40 grams per square meter but not more than 150 grams per square meter; that either is a white paper with a GE brightness level of 85 or higher or is a colored paper\(^\text{11}\); whether or

\(^{11}\) One of the key measurements of any grade of paper is brightness. Generally speaking, the brighter the paper the better the contrast between the paper and the ink. Brightness is measured using a GE Reflectance Scale, which measures the reflection of light off a grade of
not surface-decorated, printed (except as described below),
embossed, perforated, or punched; irrespective of the smoothness
of the surface; and irrespective of dimensions ("Certain Uncoated
Paper").

Certain Uncoated Paper includes (a) uncoated free sheet paper that
meets this scope definition; (b) uncoated groundwood paper
produced from bleached chemi-thermo-mechanical pulp
("BCTMP") that meets this scope definition; and (c) any other
uncoated paper that meets this scope definition regardless of the
type of pulp used to produce the paper.

Specifically excluded from the scope are imports of paper printed
with final content of printed text or graphics.

Imports of the subject merchandise are provided for under HTSUS
categories 4802.56.1000, 4802.56.2000, 4802.56.3000,
4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040,
4802.57.1000, 4802.57.2000, 4802.57.3000, and 4802.57.4000.
Some imports of subject merchandise may also be classified under
4802.62.1000, 4802.62.2000, 4802.62.3000, 4802.62.5000,
4802.62.6020, 4802.62.6040, 4802.69.1000, 4802.69.2000, and
4802.69.3000. While HTSUS subheadings are provided for
convenience and customs purposes, the written description of the
scope of the investigations is dispositive.

F. Class Or Kind Of Merchandise And Domestic Like Product

There is a single class or kind of merchandise that consists of Certain Uncoated Paper as
defined herein. Pursuant to 19 U.S.C. § 1677(10), the product which is “like, or in the absence
of like, most similar in characteristics and uses with the article subject to investigation” is
Certain Uncoated Paper. Accordingly, the product that is like the subject merchandise is Certain
Uncoated Paper.
G. Countries Of Exportation

The countries of origin of the subject imports of Certain Uncoated Paper are Australia, Brazil, China, Indonesia, and Portugal.

Although official import statistics show imports of Certain Uncoated Paper from Hong Kong, there is no known Hong Kong production of paper products, including Certain Uncoated Paper. One Chinese producer, Shandong Chenming Paper Holdings Ltd., has been transshipping subject merchandise through Hong Kong since June 2012. See Petition Volume VII, Section 5 (China Antidumping Petition). Thus, all imports reported entered as Hong Kong in origin are believed to originate from China.

H. Producers And Exporters Of Subject Merchandise

The names, addresses, phone numbers, and other available contact information of companies that produce or export subject merchandise are provided in Exhibit I-7.13

I. Names, Addresses, And Phone Numbers Of Importers Of Subject Merchandise

The names, addresses, phone numbers, and other available contact information of companies that may be U.S. importers of subject merchandise are provided in Exhibit I-8.

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12 See Volume VII at Exhibit VII-14 (\[ \]

13 Petitioners certify that each item of information specified in 19 C.F.R. § 207.11(b)(2) that is not included in these petitions was not reasonably available to Petitioners. See 19 C.F.R. § 207.11(3).
J. Proposed Products For Collection Of Pricing Information

Petitioners recommend that the Commission collect product-specific pricing information for the following products in the preliminary investigations:

**Product 1** – Uncoated paper, weighing 20 lb. (75 gsm), with dimensions of 8 1/2 x 11 inches, and with GE brightness greater than 90

**Product 2** – Uncoated paper, weighing 50 - 60 lb. (74-89 gsm), with dimensions of 23 x 35 inches and with GE brightness greater than 90

**Product 3** – Uncoated paper, weighing 50 - 60 lb. (74-89 gsm), with dimensions of 25 x 38 inches and with GE brightness greater than 90

III. THE DOMESTIC LIKE PRODUCT AND INDUSTRY DEFINITIONS

A. The Domestic Like Product Is Certain Uncoated Paper

The domestic like product is defined as the product that is “like, or in the absence of like, most similar in characteristics and uses with the article subject to investigation.” 19 U.S.C. § 1677(10). The Commission should define the domestic like product in these investigations as co-extensive with the scope of investigations.

The starting point for the like product analysis is the scope definition. The domestic like product is the product that is “like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.” This petition defines the scope as:

The merchandise covered by this investigation includes uncoated paper in sheet form; weighing at least 40 grams per square meter but not more than 150 grams per square meter; that either is a white paper with a GE brightness level of 85 or higher or is a colored paper\(^\text{14}\); whether or not surface-decorated, printed (except

\(^{14}\) One of the key measurements of any grade of paper is brightness. Generally speaking, the brighter the paper the better the contrast between the paper and the ink. Brightness is measured using a GE Reflectance Scale, which measures the reflection of light off a grade of paper. One is the lowest reflection, or what would be given to a totally black grade, and 100 is the brightest measured grade. “Colored paper” as used in this scope definition means a paper with a hue other than white that reflects one of the primary colors of magenta, yellow, and cyan (red, yellow, and blue) or a combination of such primary colors.
as described below), embossed, perforated, or punched; irrespective of the smoothness of the surface; and irrespective of dimensions ("Certain Uncoated Paper").

Certain Uncoated Paper includes (a) uncoated free sheet paper that meets this scope definition; (b) uncoated groundwood paper produced from bleached chemi-thermo-mechanical pulp ("BCTMP") that meets this scope definition; and (c) any other uncoated paper that meets this scope definition regardless of the type of pulp used to produce the paper.

Specifically excluded from the scope are imports of paper printed with final content of printed text or graphics.

Imports of the subject merchandise are provided for under HTSUS categories 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.57.1000, 4802.57.2000, 4802.57.3000, and 4802.57.4000. Some imports of subject merchandise may also be classified under 4802.62.1000, 4802.62.2000, 4802.62.3000, 4802.62.5000, 4802.62.6020, 4802.62.6040, 4802.69.1000, 4802.69.2000, and 4802.69.3000. While HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the investigations is dispositive.

Based on the plain language of the scope, the Commission’s like product analysis, and prior Commission determinations, the Commission should find that there is a single like product that is co-extensive with the scope and that does not include any other type or form of paper.

1. **Physical characteristics and end uses**

All Certain Uncoated Paper shares the same physical characteristics and end uses. As described above, Certain Uncoated Paper typically is produced with chemical pulp (sometimes referred to as kraft pulp) or BCTMP (which has many of the physical characteristics as a chemical pulp, but is technically considered a mechanical pulp), and may also be produced with recycled pulp. In the United States, Certain Uncoated Paper typically is made with chemical pulp, which would classify the paper as UFS.
Certain Uncoated Paper is unlike coated paper in terms of physical characteristics and uses. In *Coated Free Sheet Paper*, the Commission found that the coating on coated freesheet paper gives it a better printing surface – in terms of brightness, smoothness, and gloss – than Certain Uncoated Paper. Moreover, for a given basis weight, Certain Uncoated Paper is “bulkier than coated . . . paper, consumes more ink, and has inferior printing surfaces . . . {while coated paper} has higher print performance and fidelity due to superior ink retention (i.e., hold out).”

Certain Uncoated Paper also is unlike groundwood paper in terms of physical characteristics and uses. In *Coated Groundwood Paper*, the Commission found groundwood paper and free sheet paper to be distinct in their physical characteristics and uses. In particular, groundwood papers (excluding those produced with BCTMP) are produced with

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15 *Coated Free Sheet Paper from China, Indonesia, and Korea*, Inv. Nos. 701-TA-444-446 (Preliminary) and 731-TA-1107-1109 (Preliminary), USITC Pub. 3900 (Dec. 2006) at 6, 1-10-11 (“*Coated Free Sheet Paper from China, Indonesia, and Korea (Preliminary)*”).  

16 *Id.*  

17 *Coated Groundwood Paper From Belgium, Finland, France, Germany, and the United Kingdom*, Inv. Nos. 731-TA-487, -488, -489, -490, -494 (Final), USITC Pub. 2467 (Dec. 1991) at 4, A-4, n.4 (“{T}wo broad categories of printing paper have emerged in recent periods – groundwood paper, with mechanically obtained fibers constituting more than 10 percent of its total fiber weight; and freesheet paper, with mechanically obtained fibers constituting 10 percent or less of its total fiber weight.”) (“*Coated Groundwood Paper From Belgium, Finland, France, Germany, and the United Kingdom (Final)*”).  

18 *Id.* at 4, A-6. The Commission described coated and uncoated free sheet paper as being used “primarily for more permanent and high priced publications, such as premium magazines, gift books, and art reproductions” and “finer drawing and handwritten paper, commercial correspondence paper, letterhead, carbonizing base, and wallpaper base,” respectively. *Id.* (emphasis supplied). By contrast, the Commission described coated groundwood paper as being used for “multi-colored publications that commonly remain in use from several days to a month – primarily magazines and merchandizing catalogues, but also better quality newspaper inserts, direct mail advertisements, and coupons.” *Id.* (emphasis supplied).
mechanical pulp, which is pulp produced by a mechanical grinding process, in which heat may also be applied. Mechanical pulp content is important because "significant mechanical pulp content causes paper to discolor with age." In addition, uncoated groundwood paper is generally not sold in sheet form.

Certain Uncoated Paper also is unlike rolls of uncoated paper in terms of physical characteristics and end uses. Certain Uncoated Paper consists of sheets of generally standardized dimensions that are packaged and sold for use in sheet fed printers and copiers. Thus, Certain Uncoated Paper cannot be used in web offset printers. Conversely, rolls of uncoated paper cannot be used in sheet fed printers and copiers without first being converted to finished sheets. Petitioners are not aware of any imports of rolls that are converted into finished sheets meeting the scope definition of Certain Uncoated Paper.

Certain Uncoated Paper with a basis weight within the scope of the petition (i.e., paper weighing at least 40 gsm but not more than 150 gsm) is unlike uncoated paper of less than 40 gsm or more than 150 gsm in terms of physical characteristics and end uses. For example, Certain Uncoated Paper has different weight, stiffness, thickness, opacity, strength (i.e., tensile/tear resistance) than does uncoated paper of less than 40 gsm or more than 150 gsm. In particular, uncoated paper of less than 40 gsm has lower strength and stability than Certain Uncoated Paper; is difficult to sheet; and will not perform in common imaging equipment. Uncoated paper of more than 150 gsm is heavier and stiffer than Certain Uncoated Paper, and is not economical in high volume applications like copying or imaging.

Uncoated paper of less than 40 gsm or more than 150 gsm also has different uses than does Certain Uncoated Paper. In particular, uncoated paper of less than 40 gsm is used for high

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19 Coated Free Sheet Paper from China, Indonesia, and Korea (Preliminary) at 6.
page count books (such as bibles and reference books) and certain financial publications and pharmaceutical inserts. Uncoated paper of more than 150 gsm is used for file folders, tag stock, posters, menus, and report covers, among other things.

2. Interchangeability

All Certain Uncoated Paper is generally interchangeable. By contrast, Certain Uncoated Paper is rarely substituted for coated paper because of the unique printing characteristics of each.\(^{20}\) Certain Uncoated Paper also is infrequently substituted for groundwood paper.\(^{21}\) According to the Commission in Certain Groundwood Paper, "(m)ost buyers decide upon the printing effect, both visual and tangible, they wish to achieve and select a paper accordingly. Switching may occur, if another type of paper better suits their needs or constraints, but most publishers – particularly those of recurring products like magazines and catalogues – are neither indifferent nor capricious as to their choice of paper."\(^{22}\)

Certain Uncoated Paper is not interchangeable with uncoated paper in rolls. Rolls cannot be used in sheet-fed presses and copiers, and Certain Uncoated Paper cannot be used in web presses.

Certain Uncoated Paper also is not interchangeable with uncoated paper of less than 40 gsm or more than 150 gsm. Uncoated paper of less than 40 gsm cannot be interchanged with Certain Uncoated Paper because of the difficulty of running the lighter weight paper through a digital copier or printer and due to the sheet handling and flimsy feel of the lighter weight paper. Uncoated paper of more than 150 gsm is not interchangeable with Certain Uncoated Paper, as the

\(^{20}\) Id. at 6, 1-12.

\(^{21}\) Coated Groundwood Paper From Belgium, Finland, France, Germany, and the United Kingdom (Final) at 4, A-9.

\(^{22}\) Id.
stiffness of the heavier paper makes it difficult to run through a digital copier or printer. In addition, uncoated paper of more than 150 gsm is sold at a higher price per sheet than Certain Uncoated Paper.

3. **Channels of distribution**

All Certain Uncoated Paper is sold in the same channels of distribution, specifically to office superstores (such as Office Depot and Staples), club stores (such as Sam’s Club, Costco, and BJ’s), retailers (such as Wal-Mart, Target, Rite-Aid, Kroger, Walgreen’s, CVS, and Best Buy), paper merchants, and end users (such as commercial printers, offices, and schools). Certain Uncoated Paper is marketed under various brands and labels. Certain Uncoated Paper produced by U.S. manufacturers can be sold as private label product which has the customer’s brand/label on the box (e.g., Staples, Office Depot, Wal-Mart). Certain Uncoated Paper can be mill branded product which is sold under the brands that are owned and marketed by the manufacturing mills. Certain Uncoated Paper can also be OEM branded, which is a private label brand for an Office Equipment Manufacturer (e.g., Xerox, Canon, HP).

Certain Uncoated Paper and coated paper are both sold through distributors and end users, but coated paper “is sold directly to users such as magazine, catalogue, and book publishers, whereas direct sales of uncoated free sheet often go to envelope and forms converters and office supply stores in addition to book publishers.”

Certain Uncoated Paper is not sold in the same channels of distribution as uncoated groundwood paper, which is sold primarily to newspaper printers and publishers.

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23 *Coated Free Sheet Paper from China, Indonesia, and Korea (Preliminary)* at 6.

24 *Id.* at 1-13.
Certain Uncoated Paper is sold in different channels of distribution than uncoated rolls. Web rolls frequently are sold to publishers or advertisers, who contract with printers for printing jobs. Web rolls are typically produced in smaller runs to customers' specification and are not held in inventory. By contrast, Certain Uncoated Paper is a standard commodity product that is not produced to order, is sold in large volumes to office supply stores, retailers, and paper merchants, and is frequently held in inventory.

Finally, Certain Uncoated Paper is sold through different channels of distribution than uncoated paper of less than 40 gsm or more than 150 gsm. As described above, Certain Uncoated Paper is sold through office superstores, club stores, retailers, and paper merchants. Uncoated paper of less than 40 gsm is sold through paper merchants or brokers or directly to paper converters to print, coat, or otherwise convert the paper into office products, but the purchasers are a small group of specialized printers. Uncoated paper of more than 150 gsm is primarily sold in smaller volumes through paper merchants; there are few direct sales to printers or other users.

4. Customer and producer perceptions

All Certain Uncoated Paper shares the same customer and producer perceptions. By contrast, customers and producers view Certain Uncoated Paper as distinct from coated paper. As pointed out by the Commission in *Coated Free Sheet Paper*, "the general perception is that {coated free sheet paper} is a superior product {to uncoated free sheet paper} because it prints better than uncoated free sheet {paper}."^25

Customers and producers also view Certain Uncoated Paper as different from groundwood paper. As described above, Certain Uncoated Paper is made by a chemical pulping

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^25 *Coated Free Sheet Paper from China, Indonesia, and Korea (Preliminary)* at I-12.
higher prices, due to the lower volumes of production, the niche applications served, and the increased raw material usage (fiber, chemicals, etc.).

B. U.S. Producers Of Certain Uncoated Paper Constitute The Domestic Industry

The statute defines the term “industry” as “the producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.” 19 U.S.C. § 1677(4)(A). The domestic industry is comprised of the U.S. producers of Certain Uncoated Paper.

IV. CUMULATION AND NEGLIGIBILITY

A. The Subject Imports Should Be Cumulated

Imports of the subject merchandise from Australia, Brazil, China, Indonesia, and Portugal satisfy all of the criteria for cumulation. Specifically, all of the petitions are being filed on the same day and, as discussed below, there is a reasonable overlap in competition in the U.S. market among subject imports and the domestic like product.

1. Certain Uncoated Paper is highly interchangeable, regardless of source

Domestically produced Certain Uncoated Paper and subject imports are highly interchangeable. U.S. producers and producers in the subject countries produce the full array of basis weights and sizes demanded in the U.S. market. Over 90 percent of Certain Uncoated Paper is sold as cut-size paper, that is, in standard size formats – 8½ x 11 inches, 8½ x 14 inches, and 11 x 17 inches. All domestic and subject producers make these standard sizes. No specific customer requirements detract from the high degree of competition from all sources. Subject imports and the domestic like product are also comparable in terms of quality.

34 American Forest & Paper Association, 2013 Uncoated Free Sheet Survey p. 4, provided in Exhibit 1-3 (Attachment A).
Data on monthly U.S. import volumes and the relative shares of the subject countries for the period December 2013-November 2014 demonstrate that subject imports from each of the subject countries exceeded the negligibility threshold.\textsuperscript{37}

V. THE DOMESTIC INDUSTRY IS MATERIALLY INJURED BY REASON OF SUBJECT IMPORTS

A. Conditions Of Competition

1. Certain Uncoated Paper is a commodity-like product that competes on the basis of price

Certain Uncoated Paper is sold primarily as office paper for use in photocopy machines and printers. Certain Uncoated Paper is typically sold in the United States in standard sizes, e.g., 8½ x 11 inches (letter size), 8½ x 14 inches (legal size), and 11 x 17 inches. In fact, letter and legal size sheets account for 84 percent of the U.S. market for Certain Uncoated Paper.\textsuperscript{38} This high degree of standardization makes Certain Uncoated Paper a fungible, price sensitive product regardless of source.

2. Demand for Certain Uncoated Paper is declining

In evaluating the significance of subject imports, the Commission considers certain conditions of competition, including trends in U.S. consumption. U.S. demand for Certain Uncoated Paper has declined in response to diminishing demand for printing and writing papers. RISI estimates that over the past 15 years, shipments of UFS paper decreased by 42 percent, or an average of approximately 2.8 percent per year.\textsuperscript{39} The declining demand for all printing and

\textsuperscript{37} See Exhibit I-12.

\textsuperscript{38} American Forest & Paper Association, 2013 Uncoated Free Sheet Survey p. 4, provided in Exhibit I-3 (Attachment A).

\textsuperscript{39} RISI – Market Profile/Uncoated Freesheet Paper: Big Shutdown by IP at Courtland Spurs a Turnaround Drive.
writing papers, including Certain Uncoated Paper, stems from the increased popularity of on-line bill paying, e-mail communications, electronic record keeping, and e-readers, all of which have reduced the demand for office and book papers.

3. Production of Certain Uncoated Paper is capital intensive

Production of Certain Uncoated Paper is capital intensive. Petitioners estimate that a new paper machine installed in an existing paper mill with supporting pulp production would cost in excess of $600 million. Moreover, many U.S. producers of Certain Uncoated Paper also produce the pulp used to make the paper. Pulping equipment is also costly. A new greenfield pulp and paper mill would cost well in excess of $1 billion.

B. The Volume Of Subject Imports And The Increase In The Volume Of Subject Imports Are Significant

In evaluating whether there is material injury by reason of subject imports, the Commission must “consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”40 Whether measured on an absolute basis or relative to apparent U.S. consumption and U.S. production, the volume of subject imports is significant. See Table I-1. The increase in subject imports is also significant.

In 2013, subject imports totaled 671,208 short tons and constituted 79.6 percent of imports from all countries. Petitioners estimate that, in 2013, subject imports equaled 14.6 percent of U.S. consumption. Thus, subject imports are significant within the meaning of the statute in terms of absolute volume and in relation to U.S. consumption.

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Table I-1 Imports of Certain Uncoated Paper

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2013</th>
<th>2014</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Australia</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume (short tons)</td>
<td>22,083</td>
<td>51,046</td>
<td>53,678</td>
<td>44,375</td>
<td>66,950</td>
</tr>
<tr>
<td>Value ($1,000)</td>
<td>19,611</td>
<td>42,096</td>
<td>44,008</td>
<td>36,288</td>
<td>54,303</td>
</tr>
<tr>
<td>AUV ($/ton)</td>
<td>888</td>
<td>825</td>
<td>820</td>
<td>818</td>
<td>811</td>
</tr>
<tr>
<td><strong>Brazil</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Value ($1,000)</td>
<td>159,592</td>
<td>150,593</td>
<td>200,264</td>
<td>148,776</td>
<td>178,742</td>
</tr>
<tr>
<td>AUV ($/ton)</td>
<td>995</td>
<td>983</td>
<td>920</td>
<td>925</td>
<td>915</td>
</tr>
<tr>
<td><strong>China ¹</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume (short tons)</td>
<td>18,330</td>
<td>49,974</td>
<td>95,089</td>
<td>72,569</td>
<td>113,249</td>
</tr>
<tr>
<td>Value ($1,000)</td>
<td>19,814</td>
<td>44,661</td>
<td>76,541</td>
<td>58,394</td>
<td>91,096</td>
</tr>
<tr>
<td>AUV ($/ton)</td>
<td>1,081</td>
<td>894</td>
<td>805</td>
<td>805</td>
<td>804</td>
</tr>
<tr>
<td><strong>Indonesia</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume (short tons)</td>
<td>105,560</td>
<td>116,421</td>
<td>128,071</td>
<td>82,723</td>
<td>183,448</td>
</tr>
<tr>
<td>Value ($1,000)</td>
<td>98,122</td>
<td>102,747</td>
<td>109,175</td>
<td>71,511</td>
<td>158,799</td>
</tr>
<tr>
<td>AUV ($/ton)</td>
<td>930</td>
<td>883</td>
<td>852</td>
<td>864</td>
<td>866</td>
</tr>
<tr>
<td><strong>Portugal</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume (short tons)</td>
<td>159,955</td>
<td>156,101</td>
<td>176,580</td>
<td>135,104</td>
<td>136,900</td>
</tr>
<tr>
<td>Value ($1,000)</td>
<td>166,444</td>
<td>156,616</td>
<td>176,594</td>
<td>134,799</td>
<td>137,093</td>
</tr>
<tr>
<td>AUV ($/ton)</td>
<td>1,041</td>
<td>1,003</td>
<td>1,000</td>
<td>998</td>
<td>1,001</td>
</tr>
<tr>
<td><strong>Total Subject Imports</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volume (short tons)</td>
<td>466,291</td>
<td>526,731</td>
<td>671,208</td>
<td>495,658</td>
<td>695,942</td>
</tr>
<tr>
<td>Value ($1,000)</td>
<td>463,583</td>
<td>496,713</td>
<td>606,582</td>
<td>449,769</td>
<td>620,034</td>
</tr>
<tr>
<td>AUV ($/ton)</td>
<td>994</td>
<td>943</td>
<td>904</td>
<td>907</td>
<td>891</td>
</tr>
</tbody>
</table>

Source: USITC Dataweb imports for HTSUS 4802.56 and 4802.57.

¹ Includes imports from Hong Kong, which are all believed to originate from China.

The increase in subject imports is also significant. As shown in Table I-2 below, subject imports increased by 43.9 percent from 2011 to 2013 and another 40.4 percent from January-September 2013 to January-September 2014. Subject imports increased from 9.8 percent of U.S. consumption in 2011 to 14.6 percent of U.S. consumption in 2013 and from 14.2 percent of U.S. consumption in January-September 2013 to 20.5 percent of U.S. consumption in January-September 2014.
Table I-2: U.S. Shipments and Imports of Certain Uncoated Paper, Apparent Consumption, and Market Shares

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>Change '11 to '13</th>
<th>January-September</th>
<th>Change '13 to '14</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Shipments and Imports (Short Tons)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>U.S. Industry</td>
<td>4,069,200</td>
<td>3,889,600</td>
<td>3,740,100</td>
<td>-8.1%</td>
<td>2,869,100</td>
<td>2,591,400</td>
</tr>
<tr>
<td>Australia</td>
<td>22,083</td>
<td>51,046</td>
<td>53,678</td>
<td>143.1%</td>
<td>44,375</td>
<td>66,950</td>
</tr>
<tr>
<td>Brazil</td>
<td>160,363</td>
<td>153,189</td>
<td>217,791</td>
<td>35.8%</td>
<td>160,887</td>
<td>195,395</td>
</tr>
<tr>
<td>China1</td>
<td>18,330</td>
<td>49,974</td>
<td>95,089</td>
<td>418.8%</td>
<td>72,569</td>
<td>113,249</td>
</tr>
<tr>
<td>Indonesia</td>
<td>105,560</td>
<td>116,421</td>
<td>128,071</td>
<td>21.3%</td>
<td>82,723</td>
<td>183,448</td>
</tr>
<tr>
<td>Portugal</td>
<td>159,955</td>
<td>156,101</td>
<td>176,580</td>
<td>10.4%</td>
<td>135,104</td>
<td>136,900</td>
</tr>
<tr>
<td>Subject Imports</td>
<td>466,291</td>
<td>526,731</td>
<td>671,208</td>
<td>43.9%</td>
<td>495,658</td>
<td>695,942</td>
</tr>
<tr>
<td>All Other Countries</td>
<td>206,841</td>
<td>179,296</td>
<td>171,861</td>
<td>-16.9%</td>
<td>132,153</td>
<td>114,797</td>
</tr>
</tbody>
</table>

**Apparent Consumption (Short Tons)**

|                  | 4,742,332| 4,595,627| 4,583,170| -3.4%             | 3,496,911         | 3,402,138        | -2.7%            |

**Shares of Apparent Consumption (%)**

<p>| | | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Industry</td>
<td>85.8%</td>
<td>84.6%</td>
<td>81.6%</td>
<td></td>
<td>82.0%</td>
<td>76.2%</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>0.5%</td>
<td>1.1%</td>
<td>1.2%</td>
<td></td>
<td>1.3%</td>
<td>2.0%</td>
<td></td>
</tr>
<tr>
<td>Brazil</td>
<td>3.4%</td>
<td>3.3%</td>
<td>4.8%</td>
<td></td>
<td>4.6%</td>
<td>5.7%</td>
<td></td>
</tr>
<tr>
<td>China1</td>
<td>0.4%</td>
<td>1.1%</td>
<td>2.1%</td>
<td></td>
<td>2.1%</td>
<td>3.3%</td>
<td></td>
</tr>
<tr>
<td>Indonesia</td>
<td>2.2%</td>
<td>2.5%</td>
<td>2.8%</td>
<td></td>
<td>2.4%</td>
<td>5.4%</td>
<td></td>
</tr>
<tr>
<td>Portugal</td>
<td>3.4%</td>
<td>3.4%</td>
<td>3.9%</td>
<td></td>
<td>3.9%</td>
<td>4.0%</td>
<td></td>
</tr>
<tr>
<td>Subject Imports</td>
<td>9.8%</td>
<td>11.5%</td>
<td>14.6%</td>
<td></td>
<td>14.2%</td>
<td>20.5%</td>
<td></td>
</tr>
<tr>
<td>All Other Countries</td>
<td>4.4%</td>
<td>3.9%</td>
<td>3.7%</td>
<td></td>
<td>3.8%</td>
<td>3.4%</td>
<td></td>
</tr>
</tbody>
</table>


1 Includes imports from Hong Kong, which are all believed to originate from China.

Subject imports also increased relative to Petitioning Producers' U.S. production, as shown on Table I-3 below:
decreased from 2011 to 2013. The AUVs continued to fall for three of the five countries in the interim period, and remained below 2011 levels for all five countries. As imports increased and their AUVs decreased, domestic prices for Certain Uncoated Paper were also driven downwards from 2011 to 2013. There was a slight improvement in domestic prices in 2014 following major plant closures in the United States due to the adverse impact of subject imports.

The increasing volume and price underselling of subject imports also suppressed the prices of the domestic like product. 

\[41\]

4. Lost sales and lost revenues

Petitioning Producers have provided available information regarding lost sales and lost revenues.\[42\] Petitioners note that this exhibit is by no means comprehensive. Because much Certain Uncoated Paper is sold through merchant/distributors, it is difficult to document and quantify specific instances of lost sales in the format and at the level of detail that the Commission has traditionally required. In such circumstances, Petitioners request the Commission and its staff to consider more general lost sales and lost revenue allegations.

D. Subject Imports Have Had An Adverse Impact On The Domestic Industry

1. Mill closures

U.S. producers of Certain Uncoated Paper have shuttered capacity as demand for printing and writing paper has declined and subject imports have increased. Efforts to rationalize production and supply in the United States have been undermined by an influx of subject

\[41\] See Exhibit I-15.

\[42\] See Exhibit I-16. In accordance with 19 C.F.R. § 207.11(b)(2)(v), Petitioners will submit all lost sales and lost revenue allegations electronically in the manner specified in the Commission’s Handbook on Filing Procedures.

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imports. Since January 2011, the following eight U.S. mills producing UFS paper have been permanently or indefinitely shuttered:

- Boise, Inc., International Falls, Minnesota, September 30, 2013 (partial closure, 265 workers laid off)
- Domtar, Ashdown, Arkansas, July 1, 2011 (110 workers laid off)
- Georgia-Pacific, Crossett, Arkansas, November 15, 2013 (20 workers laid off)
- International Paper, Courtland, Alabama, one machine shut down on November 20, 2013. Two additional machines shut down in February 2014 (1,127 workers laid off)
- Lincoln Paper and Tissue, Lincoln, Maine, December 11, 2013 (200 workers laid off)
- Mohawk Fine Papers, Hamilton, Ohio, January 13, 2012 (137 workers laid off)
- Wausau Paper, Brokaw, Wisconsin, December 9, 2011 (450 workers laid off)

As a result of these closures, workers at seven of these mills have applied for assistance under the Trade Adjustment Assistance (“TAA”) program. Under TAA, the Department of Labor certifies workers for assistance when “increased imports contributed importantly to worker group separations.” The Department of Labor has certified workers for TAA at the following UFS mills:

- Boise mill in International Falls, Minnesota
- Domtar mill in Ashdown, Arkansas
- Harbor Paper mill in Hoquiam, Washington
- International Paper mill in Courtland, Alabama
- Lincoln Paper and Tissue mill in Lincoln, Maine
- Mohawk Paper mill in Hamilton, Ohio
- Wausau Paper mill in Brokaw, Wisconsin

TAA certifications for the above closed mills are included in Exhibit I-17.
b) Brazil

International Paper is considering a second paper machine at its Três Lagoas site in 2016, which would add 200,000 metric tons of capacity in Brazil.\textsuperscript{56}

c) China

As described more fully in Volume VIII of the Petition, papermaking has been consistently encouraged by the Government of China ("GOC") in recent industrial policies.\textsuperscript{57} The current 12\textsuperscript{th} Five Year Plan (in effect from 2011 through 2015) continues this treatment, identifying the integration of forestry and papermaking as a "key" task for the country.\textsuperscript{58} The 12\textsuperscript{th} Five Year Plan for Papermaking Industry Development\textsuperscript{59} calls for transforming "the traditional papermaking industry \{into a\} sustainable modern papermaking industry"\textsuperscript{60} and for "cultivating key enterprises" by, for example, allocating "woodland resources" to particular companies.\textsuperscript{61} It also addresses subject merchandise, directing the industry to develop "low-density uncoated paper \ldots with good color printing performance \ldots such as \ldots inkjet printing


\textsuperscript{58} Twelfth Five Year Outline Of the Guidelines for National Economic and Social Development of the People's Republic of China, English translation of plan as published in Chinese by the Xinhua News Agency (Mar. 16, 2011) at 13, attached to Volume VIII at Exhibit VIII-29.

\textsuperscript{59} National Development and Reform Commission, Ministry of Industry and Information Technology, State Forestry Administration, "Twelfth Five-Year Plan for Papermaking Industry Development" (December 2011), attached to Volume VIII at Exhibit VIII-30.

\textsuperscript{60} Id.

\textsuperscript{61} Id.
paper.” An additional “objective” identified by the GOC in the plan is the addition or improvement of “4,300,000 tons of uncoated writing paper” capacity.

Additional national and provincial policies implement the GOC’s industrial policies with respect to expanding papermaking capacity for export sales. See, e.g., Development Program of Light Industry in the 12th Five Year Period (directing the “paper-making sector” to undertake a number of projects); Decision No. 40 of the State Council on Promulgating and Implementing the “Temporary Provisions on Promoting Industrial Structure Adjustment” (urging the industries of … paper making to develop towards bases and large scale.”); Opinion on Guiding the Papermaking Industry Development of Guangdong Province During the Twelfth Five-Year Plan Period (identifying papermaking as one of nine “mainstay” industries and calls on the provincial paper industry to improve its competitiveness, develop “bases” for production, and otherwise expand); Industrial Economic Development Program of Jiangsu Province in the 12th Five-Year Period (stating that the province should improve equipment in “key sectors” including

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62 Id.
63 Id.
64 Ministry of Industry and Information Technology, Development Program of Light Industry in the 12th Five Year Period (Jan. 19, 2012), attached to Volume VIII at Exhibit VIII-31.
65 Decision No. 40 of the State Council on Promulgating and Implementing the “Temporary Provisions on Promoting Industrial Structure Adjustment,” (2005) (“Decision No. 40”), attached to Volume VIII at Exhibit VIII-32. The Catalogue for the Guidance of Foreign Investment Industries applies to foreign invested enterprises, and the Directory Catalogue on Readjustment of Industrial Structure covers all other kinds of enterprises in China. The Department has found that this list of encouraged industries serves as an “important basis for guiding investment decisions, and for the governments to administer investment projects.”
papermaking), and *Twelfth Five Year Plan for the Papermaking Industry Development of Shandong Province* (calling for the continued development of writing and office paper).

Consistent with these plans, producers in China are adding substantial new capacity to produce Certain Uncoated Paper. For example, Shandong Huatai has started to shift from the production of newsprint to production of UFS at its Dongying mill, adding 250,000 metric tons of capacity. Starting in March 2014, Wuhan Chenming is shifting from newsprint production to UFS at Wuhan City, which will add 200,000 metric tons of capacity. Asia Pacific Resources International is adding a second UFS paper machine to its mill in Xinhui, which will add 450,000 metric tons of capacity. In 2014, Shandong Tralin is opening two machines at its mill in Liaocheng City, which will add 350,000 metric tons of capacity. Shandong Tianhe is starting a second machine at Ningyang in 2014, which will add 100,000 metric tons of capacity. Shandong Chenming has announced that it will start up a new UFS paper machine at Zhanjiang in June 2015. This mill is estimated to add 95,000 metric tons of capacity. Finally, UPM has announced that it will start a new paper machine at Changshu by the end of 2015, which will add 180,000 metric tons of UFS capacity.

d) **Indonesia**

The Government of Indonesia ("GOI") has named pulp and paper as one of its priority industries in its National Industry Policy, and it is actively supporting the growth of its paper

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68 Economic and Information Technology Committee of Shandong Province, *The Twelfth Five Year Plan for the Papermaking Industry Development of Shandong Province* (Dec. 11, 2011), attached to Volume VIII at Exhibit VIII-35.

Continued future growth in export markets is a key component of Portucel’s corporate strategy. In a December 2013 press release entitled “Portucel Sopocel group steps up export drive,” the company explained that it would be presenting its brands at a trade fair “as part of its strategy of finding new opportunities and consolidating business partnerships around the world.”

The company explained that ongoing investment had permitted it to “operate continuously at full capacity, placing nearly all our output on foreign markets.”

3. **Chinese and Indonesian producers receive significant countervailable subsidies**

The statute directs the Commission to take into account in a countervailing duty case “the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the WTO Subsidies Agreement), and whether imports of the subject merchandise are likely to increase.”

Listed below are examples of the subsidies that Petitioners allege are being provided to producers and exporters of the subject merchandise.

- **China**
  - Policy lending to the paper industry;
  - Preferential export financing;
  - Preferential loans to state-owned enterprises;
  - Shadow lending;
  - Preferential income tax programs;

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81 Id.

• Tariff exemptions for imported equipment;
• VAT rebates on domestically-produced equipment;
• Provision of land use rights;
• Provision of papermaking chemicals for less than adequate remuneration;
• Provision of electricity for less than adequate remuneration;
• Grants for developing new paper projects; and
• Grants to cover legal fees in trade remedy cases.

Indonesia
• Provision of standing timber;
• Government prohibition on log exports;
• Debt forgiveness,
• Export financing from Indonesia Exim Bank;
• Export credit insurance;
• Export credit guarantees;
• Tax incentives for investment in specific businesses or regions;
• VAT, sales tax, and import duty exemptions for capital goods and equipment used to produce exports; and
• Income tax reductions for companies in bonded zones.

Additional information concerning these and other subsidies that are believed to be countervailable may be found in Volumes VIII (China CVD) and IV (Indonesia CVD).

4. **Subject imports are likely to depress or suppress U.S. prices for the domestic like product**

Subject imports are significantly underselling the domestic like product and adversely affecting the prices of the domestic like product. Given the rapid increases in the volume of subject imports and rate of market penetration, subject imports are very likely to continue to
Business Proprietary Information Has Been Deleted

enter the United States at prices that will depress and suppress domestic prices and that will increase demand for further imports.

5. The domestic industry is vulnerable to subject imports

The Petitioning Producers’ financial condition [ ] The domestic industry’s increasing dis-investment in paper making assets and declining U.S. consumption demonstrate that the domestic industry is vulnerable to dumped and subsidized imports.

VII. CONCLUSION

As set forth in the other volumes of this petition, imports of Certain Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal are sold at less than their value in the United States, and imports of Certain Uncoated Paper from China and Indonesia are subsidized by their respective governments. The domestic industry is materially injured and threatened with additional material injury by reason of the subject imports.

Accordingly, the Department should initiate these investigations and make affirmative determinations of dumping and countervailable subsidies, and the Commission should make affirmative determinations of material injury by reason of the dumped and subsidized imports.

Respectfully submitted,

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- I-43 -
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Suzano Papel e Celulose S.A.
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Asia Pulp and Paper ("APP China")
Including the following companies owned by APP:

• Gold East Paper (Jiangsu) Co., Ltd.
• Gold Huasheng Paper Co., Ltd.
• Gold Shengpu (Suzhou Industrial Park) Paper Products Co., Ltd.
• Hainan Jinhai Pulp & Paper Co., Ltd.
• Ningbo Zhonghua Paper Co., Ltd.
• Ningbo Asia Pulp and Paper Co., Ltd.
• Yalonga Paper Products (Kunshan) Co., Ltd.
• Jixin (Qingyuan) Paper Industry Co., Ltd.

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Shandong Province 252600 China 
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Shandong Chenming Paper Holdings Ltd. 
(“Shandong Chenming”) 
Including the following companies owned by Shandong Chenming: 
• Jilin Chenming Paper Co., Ltd. 
• Shouguang Chenming 
• Wuhan Chenming Hanyang Paper Holdings Co., Ltd. 
• Jiangxi Chenming Paper Co., Ltd. 
• Zhanjiang Chenming pulp & Paper Co., Ltd. 
• Chenming (HK) Ltd. (This is a trading company.) 
• Shandong Chenming 
• Shouguang Meilun Paper Co., Ltd.

No. 595 Shengcheng Road, 
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Shouguang City 
Shandong Province, 262700 China

Shandong Huatai Paper Industry Shareholding Co., Ltd.
No. 251 Weigao Road, Guangrao, 
Dongying, Shandong 257335 China 
Tel: (86) 0546-7726073 
Fax: (86) 13561012411
Shandong Sun Paper Industry Joint Stock Co., Ltd. ("Sun Paper")
Including the following companies owned by Sun Paper:
- Sun Paper Industry Co., Ltd.
- Yanzhou Tianzhang Paper Ind. Co., Ltd.
- Yanzhou Zhongtian Paper Ind. Co., Ltd.
- Yanzhou Yongyue Paper Ind. Co., Ltd.
- Yanzhou Huamao Paper Ind. Co., Ltd.
- Shandong Sun Household Paper Co., Ltd.
- Sun Paper Industry (Hong Kong) Co., Ltd. (This is a trading company.)
- International Paper Sun White Board Co., Ltd.
- Shandong International Paper Sun Paperboard Co., Ltd.
- Shandong International Paper Sun Food Packaging Materials Co., Ltd.
- Yanzhou Zhaoyang
- Yanzhou Chengxin
- Shandong Sun Zhengbang Paper
- International Paper Sun White Board Co., Ltd.

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FAX: 914-696-9260
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