



A-475-059
Sunset Review
Public Document
ADCVDOps/Office II: TKS

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Enforcement and Compliance

FROM: Christian Marsh 
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Final Results of the
Fourth Expedited Sunset Review of the Antidumping Duty Finding
on Pressure Sensitive Plastic Tape from Italy

Summary

We analyzed the response of the domestic interested party in the sunset review of the antidumping duty finding covering pressure sensitive plastic tape (PSP tape) from Italy. No respondent interested party submitted a substantive response. Accordingly, we conducted an expedited (120-day) sunset review. We recommend that you approve the positions described in the Discussion of the Issues section of this memorandum. The following is a list of the issues in this sunset review for which we received a substantive response:

1. Likelihood of Continuation or Recurrence of Dumping
2. Magnitude of the Margin of Dumping Likely to Prevail

Background

On March 2, 2015, the Department of Commerce (the Department) published the notice of initiation of the fourth sunset review of the antidumping duty finding on PSP tape from Italy, pursuant to section 751(c) of the Tariff Act 1930, as amended (the Act).¹ On March 17, 2015, we received a notice of intent to participate from 3M Company, Intertape Polymer Group Inc., and Shurtape Technologies LLC (collectively “the petitioners”).²

The petitioners claimed interested party status under section 771(9)(C) of the Act, as manufacturers, producers, or wholesalers of the domestic like product in the United States. On

¹ See Initiation of Five-Year (“Sunset”) Review, 80 FR 11164 (March 2, 2015).

² See March 17, 2015, letter from the petitioners regarding Pressure Sensitive Plastic Tape from Italy: Notice of Intent to Participate.



April 1, 2015, we received an adequate substantive response from the petitioners within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i).³ We received no substantive responses from any respondent interested parties. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the Department conducted an expedited (120-day) sunset review of the antidumping duty finding on PSP tape from Italy.

Scope of the Finding

The products covered by the finding are shipments of PSP tape measuring over one and three-eighths inches in width and not exceeding four millimeters in thickness. The above described PSP tape is classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 3919.90.20 and 3919.90.50. The HTSUS subheadings are provided for convenience and for customs purposes. The written description remains dispositive.

History of the Finding

On May 31, 1977, the U.S. Department of Treasury (Treasury) published its final affirmative determination of sales at less than fair value (LTFV) in the Federal Register with respect to imports of PSP Tape from Italy.⁴ In the LTFV determination, Treasury found a range of margins for the following companies: Boston S.p.A (Boston) – zero percent to 17 percent, Comet S.p.A (Comet) – two percent to 19 percent, and Manuli Autoadhesivis S.p.A. (Manuli) – one percent to 26 percent, and Plasturopa-SIPA S.a.S (Plasturopa) – zero percent.⁵ Treasury did not publish company-specific weighted-average dumping margins, nor did it establish an “all-others” rate. However, the U.S. International Trade Commission (ITC) identified an overall, weighted-average dumping margin for Boston, Comet, and Manuli of about ten percent.⁶ Treasury determined that Plasturopa should be excluded from the finding and published its antidumping finding in the Federal Register on October 21, 1977.⁷

In 1980, the Department assumed the responsibility of administering antidumping proceedings from Treasury.⁸ Since the antidumping finding by Treasury, the Department has conducted numerous administrative reviews with respect to imports of PSP tape from Italy.⁹

³ See April 1, 2015, letter from the petitioners regarding Pressure Sensitive Plastic Tape from Italy: Substantive Response to Notice of Initiation (Substantive Response).

⁴ See Less Than Fair Value Determination-Pressure Sensitive Plastic Tape Measuring Over One and Three-Eighths Inches in Width and Not Exceeding Four Millimeters in Thickness from Italy, 42 FR 27705 (May 31, 1977).

⁵ Id. at 27706.

⁶ See Pressure Sensitive Plastic Tape From Italy; Determination of Injury or Likelihood Thereof, 42 FR 44853 (September 7, 1977) (PSP Tape from Italy ITC Determination).

⁷ See Treasury Decision 77-258; Antidumping-Pressure Sensitive Plastic Tape Measuring Over One and Three-Eighths Inches in Width and Not Exceeding Four Millimeters in Thickness from Italy, 42 FR 56110 (October 21, 1977).

⁸ Prior to the Trade Agreements Act of 1979 (1979 Act), Pub. L. 96-39, the Treasury Department issued antidumping “findings.” Section 106(a) of the 1979 Act expressly preserved the existing antidumping “findings” in the new law, but provided that after January 1, 1980, the Tariff Act of 1930 would be amended to require the Department to issue antidumping “orders” instead of “findings.”

⁹ See Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review, 48

The Department has conducted two changed circumstance reviews and determined: 1) that Tyco Adhesives Italia S.p.A. is the successor-in-interest to Manuli Tapes S.p.A.,¹⁰ and 2) that Evotape S.p.A. is the successor-in-interest to Tyco, and that Evotape Packaging and Evotape Masking are both successors-in-interest to Evotape S.p.A.¹¹

The Department has issued two scope rulings: the first on March 18, 1992, in which the Department determined that highlighting “Note Tape” was not within the scope of the finding¹² and the second on December 8, 2006, in which the Department determined that Ritrama Inc.’s dual-adhesive products (3-8699, 3-8700 3-8701 and 3-8702) were not within the scope of the finding, and that its single-adhesive products (3-7464, 3-7597, 3-7600, 3-7604, 3-7701, 3-8094, 3-8545) were within the scope of the finding.¹³

The Department has made no circumvention determinations or duty absorption determinations.

On September 1, 1998, pursuant to section 751(c) of the Act, the Department initiated the first sunset review of the antidumping finding on PSP tape from Italy.¹⁴ As a result of its review, the Department found that revocation of the antidumping finding would likely lead to continuation or recurrence of dumping, and reported a rate of 10 percent, identified by the ITC in the LTFV investigation, as the magnitude of the margin of dumping likely to prevail for all Italian producers and exporters of the subject merchandise.¹⁵ On September 23, 1999, as a result of the first sunset review determination by the Department, and the determination by the ITC that, revocation of the finding would likely lead to continuation or recurrence of dumping and material injury to an industry in the United States, the Department, pursuant to section 751(d)(2)

FR 35686 (August 5, 1983); Pressure Sensitive Plastic Tape from Italy: Final Results of Antidumping Duty Administrative Review, 51 FR 43955 (December 5, 1986); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review and Revocation in Part, 53 FR 16444 (May 9, 1988) (1985 – 1986 Admin Review); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review, 54 FR 13091 (March 30, 1989); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review and Revocation in Part, 55 FR 6031 (February 21, 1990) (1987 – 1988 Admin Review); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review, 55 FR 49670 (November 30, 1990) (1988 – 1989 Admin Review); Pressure Sensitive Plastic Tape from Italy: Final Results of Antidumping Duty Administrative Review, 56 FR 56630 (November 6, 1991); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review, 58 FR 51616 (October 4, 1993); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Administrative Review, 59 FR 36162 (July 13, 1994); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review, 60 FR 55362 (October 31, 1995); Pressure Sensitive Plastic Tape From Italy: Final Results of Antidumping Duty Administrative Review, 63 FR 50882 (September 23, 1998).

¹⁰ See Notice of Final Results of Antidumping Duty Changed Circumstances Review: Pressure Sensitive Plastic Tape from Italy, 69 FR 15297 (March 25, 2004).

¹¹ See Notice of Final Results of Antidumping Duty Changed Circumstances Review: Pressure Sensitive Plastic Tape from Italy, 75 FR 27706 (May 18, 2010).

¹² See Notice of Scope Rulings, 57 FR 19602 (May 7, 1992).

¹³ See Notice of Scope Rulings, 72 FR 5677 (February 7, 2007).

¹⁴ See Initiation of Five-Year Reviews, 63 FR 46410 (September 1, 1998).

¹⁵ See Final Results of Expedited Sunset Review: Pressure Sensitive Plastic Tape from Italy, 64 FR 853 (January 6, 1999).

of the Act, published a notice of continuation of the antidumping duty finding on PSP tape from Italy.¹⁶

On January 2, 2004, pursuant to section 751(c) of the Act, the Department initiated the second sunset review of PSP tape from Italy.¹⁷ As a result of its review, the Department found that revocation of the antidumping finding would likely lead to continuation or recurrence of dumping, and a rate of 10 percent, identified by the ITC in the LTFV investigation, as the magnitude of the margin of dumping likely to prevail for all Italian producers and exporters of the subject merchandise.¹⁸ On June 24, 2004, as a result of the second sunset review determination by the Department, and the determination by the ITC that revocation of the finding would likely lead to continuation or recurrence of dumping and material injury to an industry in the United States, the Department, pursuant to section 751(d)(2) of the Act, published a second notice of continuation of the antidumping duty finding on PSP tape from Italy.¹⁹

On May 1, 2009, pursuant to section 751(c) of the Act, the Department initiated the third sunset review of PSP tape from Italy.²⁰ As a result of its review, the Department found that revocation of the antidumping finding would likely lead to continuation or recurrence of dumping, and a rate of 10 percent, identified by the ITC in the LTFV investigation, as the magnitude of the margin of dumping likely to prevail for all Italian producers and exporters of the subject merchandise.²¹ On April 5, 2010, as a result of the third sunset review determination by the Department, and the determination by the ITC that revocation of the finding would likely lead to continuation or recurrence of dumping and material injury to an industry in the United States, the Department, pursuant to section 751(d)(2) of the Act, published a third notice of continuation of the antidumping duty finding on PSP tape from Italy.²²

The finding remains in effect for all manufacturers and exporters of the subject merchandise from Italy except for Plausturopa, which was excluded from the finding, and Autodesivitalia, S.p.A, (Autodesivitalia) and Boston, companies for whom the Department subsequently revoked the finding.²³

¹⁶ See Continuation of Antidumping Duty Finding: Pressure Sensitive Plastic Tape From Italy, 64 FR 51515 (September 23, 1999).

¹⁷ See Initiation of Five-Year (Sunset) Reviews, 69 FR 50 (January 2, 2004).

¹⁸ See Pressure Sensitive Plastic Tape From Italy: Final Results of the Second Sunset Review of Antidumping Duty Finding, 69 FR 26068 (May 11, 2004).

¹⁹ See Continuation of Antidumping Duty Findings: Prestressed Concrete Wire Strand from Japan and Pressure Sensitive Plastic Tape From Italy, 69 FR 35584 (June 25, 2004).

²⁰ See Initiation of Five-Year Sunset Review, 74 FR 20286 (May 1, 2009).

²¹ See Pressure Sensitive Plastic Tape From Italy: Final Results of the Expedited Sunset Review of Antidumping Duty Finding, 74 FR 40811 (August 13, 2009).

²² See Pressure Sensitive Plastic Tape from Italy: Notice of Continuation of Antidumping Duty Finding, 75 FR 17124 (April 5, 2010).

²³ See 1985 – 1986 Admin Review and 1987 – 1988 Admin Review.

Legal Framework

In accordance with section 751(c)(1) of the Act, the Department is conducting this sunset review to determine whether revocation of the finding would be likely to lead to continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making this determination, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of imports of the subject merchandise for the period before, and after, the issuance of the order.

In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action, H.R. Doc. 103-316, vol. 1 (1994) (SAA), the House Report, H. Rep. No. 103-826, pt. 1 (1994) (House Report), and the Senate Report, S. Rep. No. 103-412 (1994) (Senate Report), the Department's determinations of likelihood will be made on an order-wide, rather than company-specific, basis.²⁴ In addition, the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when: (a) dumping continued at any level above de minimis after the issuance of the order; (b) imports of the subject merchandise ceased after issuance of the order; or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.²⁵

In addition, as a base period of import volume comparison, it is the Department's practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew the comparison.²⁶ Also, when analyzing import volumes for second and subsequent sunset reviews, the Department's practice is to compare import volumes during the year preceding initiation of the underlying investigation to import volumes since the issuance of the last continuation notice.²⁷

Further, section 752(c)(3) of the Act states that the Department shall provide to the ITC the magnitude of the margin of dumping likely to prevail if the order were revoked. Generally, the Department selects the weighted-average dumping margins from the final determination in the original investigation, as these rates are the only calculated rates that reflect the behavior of exporters without the discipline of an order in place.²⁸ However, in certain circumstances, a

²⁴ See SAA at 879, and House Report at 56.

²⁵ See SAA at 889-90, House Report at 63-64, and Senate Report at 52; for a description of our practice, see also Policies Regarding the Conduct of Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders; Policy Bulletin, 63 FR 18871, 18872 (April 16, 1998) (Sunset Policy).

²⁶ See, e.g., Stainless Steel Bar from Germany: Final Results of the Sunset Review of the Antidumping Duty Order, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

²⁷ See Ferrovanadium from the People's Republic of China and the Republic of South Africa: Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders, 79 FR 14216 (March 13, 2014) and accompanying Issues and Decision Memorandum.

²⁸ See SAA at 890; see also Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

more recently calculated rate may be more appropriate (e.g., “if dumping margins have declined over the life of an order and imports have remained steady or increased, {the Department} may conclude that exporters are likely to continue dumping at the lower rates found in a more recent review.”)²⁹

In February 2012, the Department announced it was modifying its practice in sunset reviews such that it will not rely on weighted-average dumping margins that were calculated using the methodology found to be World Trade Organization (WTO)-inconsistent.³⁰ In the Final Modification for Reviews, the Department stated that “only in the most extraordinary circumstances” would it rely on margins other than those calculated and published in prior determinations.³¹ The Department further stated that apart from the “most extraordinary circumstances,” it would “limit its reliance to margins determined or applied during the five-year sunset period that were not determined in a manner found to be WTO-inconsistent” and that it “may also rely on past dumping margins that were not affected by the WTO-inconsistent methodology, such as dumping margins recalculated pursuant to Section 129 proceedings, dumping margins determined based on the use of total adverse facts available, and dumping margins where no offsets were denied because all comparison results were positive.”³²

Finally, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of zero or de minimis shall not by itself require the Department to determine that revocation of an antidumping duty order would not be likely to lead to a continuation or recurrence of sales at LTFV.³³

Discussion of the Issues

1. Likelihood of Continuation or Recurrence of Dumping

Petitioners’ Comments

The petitioners maintain that revocation of the antidumping duty finding on PSP tape from Italy would result in the continuation of dumping which has been persistent since the LTFV investigation, despite the existence of the finding. Without the discipline imposed by the finding, the petitioners assert that: 1) the magnitude of the margins of dumping would likely increase above the current and preceding rates; and 2) that the volume of dumped merchandise would sharply increase.³⁴ The petitioners point out that although some Italian producers have had zero or de minimis margins, the subject merchandise has been dumped at margins greater

²⁹ See SAA at 890-91.

³⁰ See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification, 77 FR 8101, 8103 (February 14, 2012) (Final Modification for Reviews).

³¹ Id.

³² Id. at 8109.

³³ See Folding Gift Boxes from the People’s Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order, 72 FR 16765 (April 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

³⁴ See Substantive Response at 2.

than de minimis (ranging from 1.19 percent to 12.66 percent) throughout the history of the finding. In addition, based on the declining imports since the second sunset review, the petitioners assert there is a likelihood of the continuation of dumping.³⁵ Therefore, the petitioners argue that revocation of the finding would lead to an increase in volume of dumped imports and would inevitably lead to a continuation of the material injury to the domestic industry by reasons of dumped imports.

Department's Position

Consistent with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the SAA, the House Report, and the Senate Report, the Department's determinations of likelihood will be made on an order-wide basis.³⁶ In addition, the Department normally will determine that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping where (a) dumping continued at any level above de minimis after the issuance of the order, (b) imports of the subject merchandise ceased after the issuance of the order, or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.³⁷ According to the SAA, "{d}eclining import volumes accompanied by the continued existence of dumping margins after the issuance of an order may provide a strong indication that, absent an order, dumping would be likely to continue, because the evidence would indicate that the exporter needs to dump to sell at pre-order volumes."³⁸

As explained above, when determining whether revocation of the order would be likely to lead to continuation of dumping, sections 752(c)(1)(A) and (B) of the Act instruct the Department to consider: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews; and (2) the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty order.

During this sunset period, there were no administrative reviews. However, as noted above, the Department has conducted numerous reviews of this finding. We were able to establish that at least one dumping margin was calculated in a manner that did not employ the zeroing methodology found to be WTO-inconsistent – *i.e.*, a rate of 3.70 percent which was calculated on remand of the 1985 – 1986 administrative review.³⁹ This rate was not affected by zeroing because all of the comparison results were positive and, therefore, we did not deny offsets for non-dumped sales when aggregating these results.⁴⁰

³⁵ See Substantive Response at 3.

³⁶ See SAA at 879, and House Report at 56.

³⁷ See SAA at 889-90, House Report at 63-64, and Senate Report at 52; see also Sunset Policy, 63 FR at 18872.

³⁸ See SAA at 889.

³⁹ See Pressure Sensitive Plastic Tape From Italy; Final Results of Antidumping Duty Administrative Review in Accordance With Decision Upon Remand, 55 FR 49550 (November 29, 1990).

⁴⁰ See memorandum to the file entitled "1985 -1986 Remand Calculation Output" dated concurrently with this determination; see also Final Modification for Reviews, 77 FR at 8103.

In addition, as noted above, when analyzing import volumes for second and subsequent sunset reviews, the Department's practice is to compare import volumes during the year preceding initiation of the underlying investigation to import volumes since the issuance of the last continuation notice. The last continuation notice for these sunset reviews was issued in April 2010.⁴¹ Since the implementation of the finding, import volumes have fluctuated. In particular, from 2009, the end of the third sunset review period, through the current sunset review period, USITC Dataweb statistics indicate that import volumes have steadily decreased, and that the yearly volumes during this sunset review period are, for the most part, significantly lower than the yearly volumes during the previous sunset review period.⁴² Given that even with the existence of the finding, dumping continued and imports generally declined over the life of the finding, including during the current sunset review period, we find likelihood of continued or recurring dumping.

2. Magnitude of the Margins of Dumping Likely to Prevail

Petitioners' Comments

The petitioners point out that in the first, second and third sunset reviews the Department reported to the ITC the ten percent weighted-average dumping margin, published by the ITC in the original investigation, as the magnitude of the margin of dumping likely to prevail if the finding were revoked. Based on these determinations, the petitioners maintain that the magnitude of the margins of dumping likely to prevail is at least ten percent.

Department's Position

Pursuant to section 752(c)(3) of the Act, the administering authority shall provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. Normally, the Department will select a weighted-average dumping margin from the investigation to report to the ITC.⁴³ The Department's preference is to select a weighted-average dumping margin from the LTFV investigation because it is the only calculated rate that reflects the behavior of the producers and exporters without the discipline of an order or suspension agreement in place.⁴⁴ Under certain circumstances, however, the Department may select a more recent rate to report to the ITC. Finally, as explained above, in accordance with the Final Modification for Reviews, the Department will not rely on weighted average dumping margins that were calculated using the WTO-inconsistent methodology.⁴⁵

⁴¹ See Pressure Sensitive Plastic Tape from Italy: Notice of Continuation of Antidumping Duty Finding, 75 FR 17124 (April 5, 2010).

⁴² See Attachment.

⁴³ See SAA at 890; see also, e.g., Persulfates from the People's Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

⁴⁴ See Eveready Battery Company v. United States, 77 F. Supp. 2d 1327, 1333 (CIT 1999); see also SAA at 890.

⁴⁵ See Final Modification for Reviews, 77 FR at 8103.

As noted above, for the past sunset reviews the Department reported a rate of ten percent, the weighted-average dumping margin identified by the ITC in the investigation as the magnitude of the margin of dumping likely to prevail if the finding were revoked. In this sunset review, pursuant to the Final Modification for Reviews, the Department examined the rates from the investigation to determine if they are WTO-consistent. However, the Department found no evidence on the record as to how the ITC identified the rate of ten percent or how Treasury calculated the company-specific range of dumping margins in the investigation. Therefore, the Department was not able to determine if the rates from the investigation are WTO-consistent. Based on our review of the information available, we determined that the 3.70 percent margin calculated on remand is WTO-consistent. Therefore, we will report to the ITC a rate of 3.70 percent as the magnitude of the margin of dumping likely to prevail.

Final Results of Review

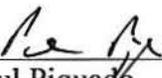
The Department determines that revocation of the antidumping duty finding on PSP tape from Italy would likely lead to continuation or recurrence of dumping, and that the magnitude of the margins of dumping likely to prevail for all producers and exporters⁴⁶ would be 3.70 percent.

Recommendation

Based on our analysis of the substantive response received, we recommend adopting all of the above positions. If these recommendations are accepted, we will publish the final results of this expedited sunset review in the Federal Register.

Agree

Disagree



 Paul Piquado
 Assistant Secretary
 for Enforcement and Compliance

30 JUNE 2015

 (Date)

⁴⁶ As noted above, Plausturopa, Autodesivitalia and Boston are excluded from the finding.

Attachment

PSP Tape: First Unit of Quantity by HTS Number and First Unit of Quantity

for Italy

U.S. Imports for Consumption

Annual Data

HTS Number	Quantity Description	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
		<i>In 1,000 Units of Quantity</i>																		
39199050	square meters	6,376	9,615	9,689	20,878	28,831	26,112	409,124	18,500	38,024	14,449	12,811	10,223	1,270	8,369	14,092	6,329	8,731	7,839	9,329
Total		6,376	9,615	9,689	20,878	28,831	26,112	409,124	18,500	38,024	14,449	12,811	10,223	1,270	8,369	14,092	6,329	8,731	7,839	9,329

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.