



A-122-853; A-570-937
Sunset Review
Public Document
ADCVDops/Office II: TKS

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Enforcement and Compliance

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

SUBJECT: Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders on Citric Acid and Certain Citrate Salts from Canada and the People's Republic of China

Summary

We analyzed the responses of the domestic interested parties in the first sunset reviews of the antidumping duty orders covering citric acid and certain citrate salts (citric acid) from Canada and the People's Republic of China (PRC). No respondent interested party submitted a substantive response. Accordingly, we conducted expedited (120-day) sunset reviews. 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 these sunset reviews for which we received substantive responses:

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

Background

On April 1, 2014, the Department of Commerce (the Department) published the notice of initiation of the first sunset reviews of the antidumping duty orders on citric acid from Canada and the PRC, pursuant to section 751(c) of the Tariff Act 1930, as amended (the Act).¹ On April 14, 2014, we received notices of intent to participate from Archer Daniels Midland Company, Cargill, Incorporated, and Tate & Lyle Ingredients Americas LLC (collectively "the petitioners").² The petitioners claimed interested party status under section 771(9)(C) of the Act, as manufacturers of a domestic like product in the United States.

¹ See Initiation of Five-Year ("Sunset") Review, 79 FR 18279 (April 1, 2014).

² See April 14, 2014, letter regarding "Five-Year ("Sunset") Review of Antidumping Duty Order on Citric Acid and

On May 1, 2014, we received adequate substantive responses 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 expedited (120-day) sunset reviews of the antidumping duty orders on citric acid from Canada and the PRC.

Scope of the Orders

The scope of the orders include all grades and granulation sizes of citric acid, sodium citrate, and potassium citrate in their unblended forms, whether dry or in solution, and regardless of packaging type. The scope also includes blends of citric acid, sodium citrate, and potassium citrate; as well as blends with other ingredients, such as sugar, where the unblended form(s) of citric acid, sodium citrate, and potassium citrate constitute 40 percent or more, by weight, of the blend. The scope of the orders also include all forms of crude calcium citrate, including dicalcium citrate monohydrate, and tricalcium citrate tetrahydrate, which are intermediate products in the production of citric acid, sodium citrate, and potassium citrate. The scope of the orders do not include calcium citrate that satisfies the standards set forth in the United States Pharmacopeia and has been mixed with a functional excipient, such as dextrose or starch, where the excipient constitutes at least 2 percent, by weight, of the product. The scope of the orders include the hydrous and anhydrous forms of citric acid, the dihydrate and anhydrous forms of sodium citrate, otherwise known as citric acid sodium salt, and the monohydrate and monopotassium forms of potassium citrate. Sodium citrate also includes both trisodium citrate and monosodium citrate, which are also known as citric acid trisodium salt and citric acid monosodium salt, respectively. Citric acid and sodium citrate are classifiable under 2918.14.0000 and 2918.15.1000 of the Harmonized Tariff Schedule of the United States (HTSUS), respectively. Potassium citrate and crude calcium citrate are classifiable under 2918.15.5000 and 3824.90.9290 of the HTSUS, respectively. Blends that include citric acid, sodium citrate, and potassium citrate are classifiable under 3824.90.9290 of the HTSUS. Although the HTSUS subheadings are provided for convenience and customs purposes, our written description of the scope is dispositive.

Certain Citrate Salts from Canada: Domestic Industry's Notice of Intent to Participate;" and the April 14, 2014, letter regarding "Five-Year ("Sunset") Review of Antidumping Duty Order on Citric Acid and Certain Citrate Salts from the People's Republic of China: Domestic Industry's Notice of Intent to Participate."

³ See May 1, 2014, letter regarding "Five-Year ("Sunset") Review of Antidumping Duty Order on Citric Acid and Certain Citrate Salts from Canada: Domestic Industry's Substantive Response" (Canada substantive response); and the May 1, 2014, letter regarding "Five-Year ("Sunset") Review of Antidumping Duty Order on Citric Acid and Certain Citrate Salts from the People's Republic of China: Domestic Industry's Substantive Response" (PRC substantive response).

History of the Orders

On May 29, 2009, the Department published in the Federal Register the antidumping duty orders on citric acid from Canada and the PRC.⁴ In the Orders, the Department assigned the following weighted-average dumping margins:

<u>Exporter/Producer</u>	<u>Percent Margin</u>
<u>Canada:</u>	
Jungbunzlauer (JBL) Canada Inc.	23.21
All Others	23.21
<u>PRC:</u> ⁵	
TTCA Co., Ltd. (a.k.a. Shandong TTCA Biochemistry Co., Ltd.)/ TTCA Co., Ltd. (a.k.a. Shandong TTCA Biochemistry Co., Ltd.)	129.08
Yixing Union Biochemical Co., Ltd./Yixing Union Biochemical Co., Ltd.	94.61
Anhui BBCA Biochemical Co., Ltd./Anhui BBCA Biochemical Co., Ltd.	111.85
Anhui BBCA Biochemical Co., Ltd./China BBCA Maanshan Biochemical Corp.	111.85
A.H.A. International Co., Ltd./Yixing Union Biochemical Co., Ltd.	111.85
A.H.A. International Co., Ltd./Nantong Feiyu Fine Chemical Co., Ltd.	111.85
High Hope International Group Jiangsu Native Produce IMP & EXP Co., Ltd./ Yixing Union Biochemical Co., Ltd.	111.85
Huangshi Xinghua Biochemical Co., Ltd./Huangshi Xinghua Biochemical Co., Ltd.	111.85
Lianyungang JF International Trade Co., Ltd./TTCA Co., Ltd. (a.k.a Shandong TTCA Biochemistry Co., Ltd.)	111.85
Laiwu Taihe Biochemistry Co., Ltd./Laiwu Taihe Biochemistry Co., Ltd.	111.85
Lianyungang Shuren Scientific Creation Import & Export Co., Ltd./Lianyungang Great Chemical Industry Co., Ltd.	111.85
Penglai Marine Bio-Tech Co. Ltd./Penglai Marine Bio-Tech Co. Ltd.	111.85
RZBC Imp & Exp. Co., Ltd./RZBC Co., Ltd/ RZBC (Juxian) Co.,/RZBC Co., Ltd.	111.85
RZBC Imp & Exp. Co., Ltd./RZBC Co., Ltd./RZBC (Juxian) Co., Ltd. /RZBC (Juxian) Co., Ltd.	111.85
RZBC Imp & Exp. Co., Ltd./RZBC Co., Ltd./RZBC (Juxian) Co., Ltd. /	
Lianyungang Great Chemical Industry Co., Ltd.	111.85
Shihezi City Changyun Biochemical Co., Ltd./Shihezi City Changyun Biochemical Co., Ltd	111.85
Weifang Ensign Industry Co., Ltd./Weifang Ensign Industry Co., Ltd.	111.85
PRC-Wide Entity	156.87

⁴ See Citric Acid and Certain Citrate Salts from Canada and the People's Republic of China: Antidumping Duty Orders, 74 FR 25703 (May 29, 2009) (Orders).

⁵ The cash deposit rate for all PRC companies named below, except for Yixing Union Biochemical Co., Ltd./Yixing Union Biochemical Co., Ltd., were modified to account for export subsidies.

Since the issuance of the Orders, the Department has completed four administrative reviews (ARs) of the antidumping duty (AD) order on citric acid from Canada covering imports of subject merchandise produced by JBL Canada Inc., the only known producer and exporter of citric acid from Canada. We calculated above de minimis margins of 1.60 percent in the first AR,⁶ 2.34 percent in the second AR,⁷ 1.20 percent in the third AR,⁸ and 0.55 percent in the fourth AR.⁹

The Department has completed three ARs of the AD order on citric acid from the PRC. In the first AR,¹⁰ we calculated a margin of 0.00 percent for RZBC Co., Ltd./RZBC Imp. & Exp. Co., Ltd./RZBC (Juxian) Co., Ltd., (collectively RZBC) and a margin of 1.01 percent for Yixing Union Biochemical Co., Ltd. (Yixing). In the second AR,¹¹ we calculated a margin of 0.00 percent for RZBC and in the third AR¹² we calculated a margin of 0.00 percent for RZBC Imp. & Exp. Co., Ltd.¹³ The Department is currently conducting the fourth AR of the AD order on citric acid from the PRC.

The Department issued three scope rulings of the Orders.¹⁴ There have been no changed circumstances determinations or findings of duty absorption by the Department over the history of the Orders.¹⁵ The Orders remain in effect for all Canadian and Chinese manufacturers, producers, and exporters of the subject merchandise.

⁶ See Citric Acid and Certain Citrate Salts From Canada: Final Results of Antidumping Duty Administrative Review, 76 FR 34044 (June 10, 2011).

⁷ See Citric Acid and Certain Citrate Salts From Canada: Final Results of Antidumping Duty Administrative Review, 77 FR 24461 (April 24, 2012).

⁸ See Citric Acid and Certain Citrate Salts From Canada: Final Results of Antidumping Duty Administrative Review; 2011- 2012, 78 FR 64914 (October 30, 2013).

⁹ See Citric Acid and Certain Citrate Salts From Canada: Final Results of Antidumping Duty Administrative Review; 2012- 2013, 79 FR 37286 (July 1, 2014).

¹⁰ See Citric Acid and Certain Citrate Salts from the People's Republic of China: Final Results of the First Administrative Review of the Antidumping Duty Order, 76 FR 77772 (December 14, 2011); see also Citric Acid and Certain Citrate Salts from the People's Republic of China: Amended Final Results of the First Administrative Review of the Antidumping Duty Order, 77 FR 9891 (February 21, 2012).

¹¹ See Citric Acid and Certain Citrate Salts from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2010-2011, 77 FR 74171 (December 13, 2012).

¹² See Citric Acid and Certain Citrate Salts from the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2011-2012, 79 FR 101 (January 2, 2014).

¹³ This company is the only RZBC entity that exported subject merchandise to the United States during this review period.

¹⁴ See Notice of Scope Rulings, 78 FR 32372 (May 30, 2013) (acetyl tributyl citrate is not within the scope of the antidumping duty and countervailing duty orders); Notice of Scope Rulings, 77 FR 9893 (February 21, 2012) (the PRC-origin portion of Global Commodity Group LLC's blended citric acid is within the scope of the antidumping duty and countervailing duty orders, and is dutiable according to the amount of citric acid from the PRC that it contains); and Notice of Scope Rulings, 76 FR 73596 (November 29, 2011) (Aceto Corporation's calcium citrate USP is within the scope of the antidumping duty and countervailing duty orders).

¹⁵ The Department found no duty absorption in either the second or fourth ARs of citric acid from Canada. See Citric Acid and Certain Citrate Salts From Canada: Preliminary Results of Antidumping Duty Administrative Review; 2011-2012, 77 FR 6061 (February 7, 2012) and Citric Acid and Certain Citrate Salts From Canada: Preliminary Results of Antidumping Duty Administrative Review; 2012- 2013, 79 FR 10093 (February 24, 2014) (Preliminary Results). The Department has made no findings of duty absorption with respect to imports of citric

Discussion of the Issues

In accordance with section 751(c)(1) of the Act, the Department is conducting these sunset reviews to determine whether revocation of the Orders 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 investigations and subsequent reviews, and the volume of imports of the subject merchandise for the period before, and after, the issuance of the orders.

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.¹⁶ 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.¹⁷

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.¹⁸

Further, section 752(c)(3) of the Act states that the Department shall provide to the International Trade Commission (ITC) the magnitude of the margin of dumping likely to prevail if the Orders were revoked. Generally, the Department selects the antidumping duty 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.¹⁹

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.²⁰ In the Final

acid from the PRC.

¹⁶ See SAA at 879, and House Report at 56.

¹⁷ 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).

¹⁸ 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.

¹⁹ 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.

²⁰ See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in

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.²¹ 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.”²²

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 less than fair value (LTFV).²³

Below we address the petitioners’ comments.

1. Likelihood of Continuation or Recurrence of Dumping

Petitioners’ Comments

The petitioners assert that the Department should conclude that revocation of the Orders would be likely to lead to continuation or recurrence of dumping when applying the Sunset Policy guidelines²⁴ in these reviews.

With respect to citric acid from Canada, the petitioners argue that an affirmative determination of continuation or recurrence of dumping is warranted under subparagraph (a) because dumping continued at a level above de minimis after the issuance of the Order. The petitioners point out that in the first, second and third ARs the Department calculated above de minimis margins for JBL Canada Inc.²⁵ Thus, the petitioners assert, JBL Canada Inc. has continued to dump at levels above de minimis in every segment of this proceeding. Therefore, the petitioners contend that the Department should conclude that JBL Canada Inc. would continue dumping were the Order revoked.

Certain Antidumping Duty Proceedings; Final Modification, 77 FR 8101, 8103 (February 14, 2012) (Final Modification for Reviews).

²¹ Id.

²² Id. at 8109.

²³ 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.

²⁴ See Sunset Policy, 63 FR at 18871.

²⁵ The petitioners note that, at the time of the filing of the Canada substantive response, they had not evaluated the Preliminary Results, inclusive of the margin in AR4, for the purpose of their argument in the sunset review.

With respect to citric acid from the PRC, the petitioners argue that an affirmative determination of continuation or recurrence is warranted under subparagraphs (a) and (c) because after issuance of the Order dumping continued at a level above de minimis and import volumes of the subject merchandise declined significantly. The petitioners point out that the margins calculated in the original investigation remain in place for all exporters and producers except for Yixing, which currently has a 1.01 percent margin, and RZBC, which has a 0.00 percent margin. As to the import volumes, the petitioners point out that in 2007 and 2008 imports of subject merchandise from China were 180,108 thousand pounds (“kip”) and 193,727 kip respectively. After the imposition of the Order imports declined precipitously to 26,886 kip in 2009; 30,789 kip in 2010; 30,939 in 2011; 25,797 kip in 2012 and 47,611 kip in 2013, and have remained at less than one-fourth the 2008 pre-Order quantity.²⁶ According to the petitioners, this indicates that Chinese exporters need to dump to sell at pre-Order volumes and dumping would be likely to continue or recur were the Order revoked.

Therefore, the petitioners argue that the Department should conclude, in accordance with the Department’s Sunset Policy, that there is likelihood that dumping would continue or recur if the Orders on citric acid from Canada and the PRC were revoked.

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.²⁷ 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.²⁸

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. 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.”²⁹

²⁶ See the petitioners’ PRC substantive response at page 6.

²⁷ See SAA at 879, and House Report at 56.

²⁸ See SAA at 889-90, House Report at 63-64, and Senate Report at 52; see also Sunset Policy, 63 FR at 18872.

²⁹ See SAA at 889.

With respect to citric acid from Canada, since the issuance of the Order the Department has conducted four ARs. In each of these reviews, the Department calculated above de minimis margins for JBL Canada Inc., the only known producer/exporter of subject merchandise from Canada. The above de minimis margins calculated in the first and second ARs were calculated using the methodology determined by the Appellate Body to be WTO-inconsistent, *i.e.*, zeroing. Accordingly, the Department is not relying on those margins. The above de minimis margins calculated in the third and fourth ARs were not based on zeroing. Therefore, given that JBL Canada Inc. has continued to dump at levels above de minimis since the original LTFV investigation, we find it is likely it would continue dumping were the order revoked. With respect to the import volumes of subject merchandise during the sunset review period, we analyzed Dataweb import statistics for subject merchandise from Canada classified under HTSUS subheadings 2918140000, 2918151000 and 2918155000 for 2007 through 2013.³⁰ The Dataweb statistics show that import volumes of subject merchandise dropped significantly from 19,843 kilograms in 2007, to 9,230 kilograms in 2008, to 1,184 kilograms in 2009, and to 13,291 kilograms in 2010. However, starting in 2011 through 2013, import volumes substantially increased well over pre-Order levels to 141,904, 2590,971 and 3,035,754 kilograms, respectively. Although in this instance the import volumes of subject merchandise dropped significantly and subsequently increased well over pre-Order volumes in the later years of this sunset review period, we find that, consistent with the guidance in the SAA,³¹ the existence of margins above de minimis during the sunset review period, inclusive of the 2011 – 2013 period, is a sufficient basis to conclude that dumping would likely continue were the Order revoked. Therefore, given that dumping margins continued to exist at levels above de minimis since the issuance of the Order, the Department finds that dumping would likely continue or recur if the Order were revoked, pursuant to section 752(c)(1) of the Act.

With respect to citric acid from the PRC, since the issuance of the Order, the Department has conducted three ARs, and the fourth AR is ongoing. In each of the completed ARs, the Department calculated either zero margins or above de minimis margins using the methodology determined by the Appellate Body to be WTO-inconsistent. However, we note that the WTO-consistent above de minimis margins calculated in the original LTFV investigation remain in place for nearly all exporters and producers of the subject merchandise. With respect to the import statistics provided by the petitioners, we reviewed the data and confirmed that import volumes of subject merchandise decreased significantly following the imposition of the Order and have remained at levels significantly below pre-Order volumes during the sunset review period. Therefore, given that there is a continued existence of above de minimis margins for U.S. imports of citric acid from the PRC since the issuance of the Order, and there have been significantly lower import levels after the imposition of the Order when compared to pre-Order levels, the Department finds that dumping would likely continue or recur if the Order were revoked, pursuant to section 752(c)(1) of the Act.

³⁰ See Memorandum to the File entitled “Dataweb Import Statistics from Canada” dated concurrently with this determination.

³¹ See SAA at 890.

2. Magnitude of the Margins Likely to Prevail

Petitioners' Comments

The petitioners request that the Department report to the ITC the dumping margins that were determined in the final determinations of the original LTFV investigations because these margins represent the best evidence of the Canadian and Chinese exporters' behavior in the absence of an order.

Department's Position

Pursuant to section 752(c)(3) of the Act and the SAA at 890, the Department normally will provide to the ITC the company-specific margins from the investigation. In non-market-economy (NME) cases, for companies not investigated specifically and which were not found to be eligible for a separate rate, or for companies that did not begin shipping until after the order was issued, the Department normally will provide a margin based on the NME-entity rate from the investigation.³² The Department's preference for selecting a margin from the LTFV investigation is based on the fact that it is the only calculated rate that reflects the behavior of manufacturers, producers, and exporters without the discipline of an order or suspension agreement in place. Under certain circumstances, however, the Department may select a more recently calculated margin to report to the ITC.

After considering the dumping margins determined in the LTFV investigations and the subsequent administrative reviews, we find that it is appropriate to provide the ITC with the margins determined in the LTFV investigations for the magnitude of the margins likely to prevail because these margins best reflect the behavior of manufacturers, producers, and exporters without the discipline of an order in place. Further, we note that the calculation of these margins were WTO-consistent because the Department ceased its zeroing practice in investigations prior to the initiation of these investigations.³³ As a result, we will report to the ITC the margins of dumping likely to prevail listed in the "Final Results of Review" section below.

³² See, e.g., Non-Malleable Cast Iron Pipe Fittings from the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order, 73 FR 39656 (July 10, 2008) and accompanying Issues and Decision Memorandum at Comment 2.

³³ See Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margins in Antidumping Investigations; Change in Effective Date of Final Modification, 72 FR 3783 (January 26, 2007).

Final Results of Review

We determine that revocation of the Orders on citric acid from Canada and the PRC would be likely to lead to continuation or recurrence of dumping at the following weighted-average percentage margins:

Manufacturers/Exporters/Producers	Weighted-Average Margin (percent)
<u>Canada:</u>	
Jungbunzlauer Canada Inc.	23.21
All Others	23.21
<u>PRC:</u>	
TTCA Co., Ltd. (a.k.a. Shandong TTCA Biochemistry Co., Ltd.)/ TTCA Co., Ltd. (a.k.a. Shandong TTCA Biochemistry Co., Ltd.)	129.08
Yixing Union Biochemical Co., Ltd./Yixing Union Biochemical Co., Ltd.	94.61
Anhui BBBCA Biochemical Co., Ltd./Anhui BBBCA Biochemical Co., Ltd.	111.85
Anhui BBBCA Biochemical Co., Ltd./China BBBCA Maanshan Biochemical Corp.	111.85
A.H.A. International Co., Ltd./Yixing Union Biochemical Co., Ltd.	111.85
A.H.A. International Co., Ltd./Nantong Feiyu Fine Chemical Co., Ltd.	111.85
High Hope International Group Jiangsu Native Produce IMP & EXP Co., Ltd./ Yixing Union Biochemical Co., Ltd.	111.85
Huangshi Xinghua Biochemical Co., Ltd./Huangshi Xinghua Biochemical Co., Ltd.	111.85
Lianyungang JF International Trade Co., Ltd./TTCA Co., Ltd. (a.k.a. Shandong TTCA Biochemistry Co., Ltd.)	111.85
Laiwu Taihe Biochemistry Co., Ltd./Laiwu Taihe Biochemistry Co., Ltd.	111.85
Lianyungang Shuren Scientific Creation Import & Export Co., Ltd./Lianyungang Great Chemical Industry Co., Ltd.	111.85
Penglai Marine Bio-Tech Co. Ltd./Penglai Marine Bio-Tech Co. Ltd.	111.85
RZBC Imp & Exp. Co., Ltd./RZBC Co., Ltd./ RZBC (Juxian) Co.,/RZBC Co., Ltd.	111.85
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RZBC Imp & Exp. Co., Ltd./RZBC Co., Ltd./RZBC (Juxian) Co., Ltd. / Lianyungang Great Chemical Industry Co., Ltd.	111.85
Shihezi City Changyun Biochemical Co., Ltd./Shihezi City Changyun Biochemical Co., Ltd	111.85
Weifang Ensign Industry Co., Ltd./Weifang Ensign Industry Co., Ltd.	111.85
PRC-Wide Entity	156.87

Recommendation

Based on our analysis of the responses received, we recommend adopting all of the above positions. If these recommendations are accepted, we will publish the final results of reviews in the Federal Register.

Agree

Disagree



Paul Piquado
Assistant Secretary
for Enforcement and Compliance

30 July 2014
(Date)