UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

A-570-836
POR: 03/01/2014-02/28/2015
Public Document
AD/CVD OPS OVI: DC

October 12, 2016

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 Administrative Review of the Antidumping Duty Order on Glycine from the People's Republic of China; 2014-2015

I. Summary

We have analyzed the case and rebuttal briefs submitted by interested parties. As a result of our analysis, we continue to determine that respondents Baoding Mantong Fine Chemistry Co., Ltd. (Baoding Mantong), Kumar Industries (Kumar), Nutracare International (Nutracare), Ravi Industries (Ravi), and Rudraa International (Rudraa) did not have shipments subject merchandise during the period of review (POR). We recommend that you approve the positions described in the "Discussion of Interested Party Comments" section of this Issues and Decision Memorandum. Below is the complete list of the issues in this administrative review for which we received comments from parties:

II. List of Issues

A. **Kumar, Ravi, and Rudraa-Specific Issues**
Comment 1: Whether Kumar, Ravi, or Rudraa Had Shipments of Subject Merchandise During the Period of Review

B. **Nutracare/Salvi-Specific Issues**
Comment 2: Whether Nutracare/Salvi Had Shipments of Subject Merchandise During the Period of Review

III. Background

On April 15, 2016, the Department of Commerce (the Department) published the preliminary results of the administrative review of glycine from the People's Republic of China (PRC) for the period March 1, 2014, through February 28, 2015.[1] The review covers five companies, Baoding Mantong, Kumar, Nutracare, Ravi, and Rudraa (collectively, the respondents).[2] GEO Specialty Chemicals, Inc. (GEO) is the domestic interested party in this review.

On May 16, 2016, GEO submitted a case brief and requested a hearing.[3] In its case brief, GEO stated that AICO Industries (AICO), the affiliate of respondents Kumar, Ravi, Rudraa, and Salvi Chemical Industries Ltd. (Salvi), the affiliated glycine producer of respondent Nutracare, continue to export Chinese-origin glycine to the United States, despite the Department's circumvention determination with regard to AICO and Salvi.[4] Furthermore, GEO stated that, contrary to the respondents' claims that the Department did not make affirmative circumvention determinations concerning Kumar, Nutracare, Ravi, and Rudraa, the *Circumvention Determination* covers glycine "produced and/or exported by AICO. . .and Salvi."[5] GEO asserts that AICO and Salvi may have been producers of the glycine that was exported by the respondents.

GEO argued that, in the *Preliminary Results*, the Department relied on the respondents' no-shipment certifications for its determination that there were no reviewable entries of subject merchandise during the POR. Specifically, GEO urged the Department to conduct verifications of the respondents' statements. GEO asserted that the *Preliminary Results* were not sufficiently supported by record evidence.

After issuing the *Preliminary Results*, the Department conducted on-site verifications of Kumar and Salvi from August 1, 2016, through August 5, 2016.[6] The purpose of the verifications was

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[1] *See Glycine From the People's Republic of China: Preliminary Results of Antidumping Duty Administrative Review; 2014-2015*, 81 FR 22212 (April 15, 2016) (*Preliminary Results*).
[2] In the *Preliminary Results*, the Department determined that Baoding Mantong did not have any shipments during the POR, and no party commented on this determination.
[3] *See* Letter to the Department of Commerce from GEO Specialty Chemicals, Inc. regarding "Glycine from the People's Republic of China: GEO Specialty Chemicals' Case Brief," dated May 16, 2016. We note that on September 21, 2016, GEO withdrew its request for a public hearing and that no other party requested a hearing.
[4] *See Glycine From the People's Republic of China: Final Partial Affirmative Determination of Circumvention of the Antidumping Duty Order*, 77 FR 73426 (December 10, 2012) (*Circumvention Determination*).
[5] *Id*., at 73427.
[6] *See* Memorandum to The File from Marcus A. Kraker, Import Policy Analyst, Office of Deputy Assistant Secretary for Policy & Negotiations, and Elisabeth Urfer, Senior International Trade Compliance Analyst, Customs Liaison Unit, through Brian Davis, Program Manager, Antidumping and Countervailing Duty Operations, Office VI, on the subject of "Verification of the Questionnaire Responses of Kumar Industries in the Antidumping Duty Review of Glycine from the People's Republic of China," dated August 19, 2016 (Kumar Verification Report), and Memorandum to The File from Marcus A. Kraker, Import Policy Analyst, Office of Deputy Assistant Secretary for Policy & Negotiations, and Elisabeth Urfer, Senior International Trade Compliance Analyst, Customs Liaison Unit, through Brian Davis, Program Manager, Antidumping and Countervailing Duty Operations, Office VI, on the subject of "Verification of the Questionnaire Responses of Salvi Chemical Industries Ltd. in the Antidumping Duty Review of Glycine from the People's Republic of China," dated August 19, 2016 (Salvi Verification Report).

to verify the no shipment claims and determine whether Kumar and Salvi are able to produce glycine from Indian raw materials.

Following these verifications, on September 2, 2016, GEO and the respondents submitted post-verification comments.[7] On September 7, 2016, GEO and the respondents submitted post-verification rebuttal comments.[8] Below, we address these post-verification comments and rebuttal comments.

IV. Scope of the Order

The product covered by this antidumping duty order is glycine, which is a free-flowing crystalline material, like salt or sugar. Glycine is produced at varying levels of purity and is used as a sweetener/taste enhancer, a buffering agent, reabsorbable amino acid, chemical intermediate, and a metal complexing agent. This proceeding includes glycine of all purity levels. Glycine is currently classified under subheading 2922.49.4020 of the Harmonized Tariff Schedule of the United States (HTSUS).[9] Although the HTSUS subheading is provided for convenience and customs purposes, the written description of the merchandise under the order is dispositive.

V. Discussion of Interested Party Comments

A. Kumar, Ravi, and Rudraa-Specific Issues

Comment 1: Whether Kumar, Ravi, or Rudraa Had Reviewable Entries of Subject Merchandise during the Period of Review

GEO's Comments

- Although the Department's verification of Kumar was limited, the verification exhibits further support GEO's assertion that, AICO imported Chinese glycine into India, via its affiliates Rakon and Reliance, to circumvent the *Order* during the POR.[10]

[7] *See* Letter to the Department of Commerce from Nutracare International, Ravi Industries, Kumar Industries, and Rudraa International regarding "Glycine from the People's Republic of China: Comments on the Preliminary Determination," dated September 2, 2016. In its September 7, 2016, letter, Nutracare, Kumar, Ravi, and Rudraa alleged that GEO submitted untimely, new factual information in its post-verification comments. We rejected GEO's submission and requested that they resubmit their comments without the new factual information. GEO resubmitted their comments on October 7, 2016 (*see* Letter to the Department of Commerce from GEO Specialty Chemicals, Inc. regarding, "Glycine from the People's Republic of China: Removal of Information from September 2, 2016 and September 7, 2016 Submissions," dated October 7, 2016).

[8] *See* Letter to the Department of Commerce from GEO Specialty Chemicals, Inc. regarding "Glycine from the People's Republic of China: GEO's Rebuttal to the Preliminary Determination and Verification Report Comments of Nutracare, Ravi, Kumar and Rudraa," dated September 7, 2016, and Letter to the Department of Commerce from Nutracare International, Ravi Industries, Kumar Industries, and Rudraa International regarding "Glycine from the People's Republic of China: Rebuttal Comments to Petitioner's Case Brief," dated September 7, 2016.

[9] In separate scope rulings, the Department determined that: (a) D(-) Phenylglycine Ethyl Dane Salt is outside the scope of the order and (b) PRC-glycine exported from India remains the same class or kind of merchandise as the PRC-origin glycine imported into India. *See Notice of Scope Rulings and Anticircumvention Inquiries*, 62 FR 62288 (November 21, 1997) and *Glycine From the People's Republic of China: Final Partial Affirmative Determination of Circumvention of the Antidumping Duty Order*, 77 FR 73426 (December 10, 2012), respectively.

[10] *See* GEO's Comment on Verification Reports at 3-4 and the Department's Analysis Memorandum for business

- The Department should indicate in its final results that the verification of AICO was unsuccessful and should apply punitive measures to Kumar, Ravi, and Rudraa as a result.

Respondents' Comments

- The Kumar Verification Report supports the Department's *Preliminary Results* that Kumar, Ravi, and Rudraa did not have shipments of subject merchandise during the POR.

- Additionally, the verification report confirms that Kumar is a full-fledged producer of glycine manufactured from basic raw materials sourced in India.

- Specifically, Kumar owns and operates a full manufacturing facility with equipment necessary to produce glycine from raw materials such as monochloroacetic acid (MCAA), hexamine, ammonia, and formaldehyde.

- The Department toured the company's facility and observed the raw material inventory, the production process, the packing, and the finished goods inventory of glycine.

- At Kumar, the Department photographed bags of raw materials, the stainless steel reactors, the cooling towers, the nutsche filter, the centrifuge, and the spin flash dryer.[11]

- Kumar officials prepared a trace from sales records to the production records of two randomly selected sales to the United States, which showed that the country of origin of the glycine produced by Kumar was India.[12]

- Department officials viewed a response by Kumar to a CF-28 request from U.S. Customs and Border Protection (CBP), which traced another Kumar shipment to production records in India, and these production traces confirmed that Kumar had accurately reported in this proceeding that it did not have exports of glycine to the United States within the scope of the *Order*.[13]

- There was no evidence at verification that the respondents purchased technical grade glycine from the PRC that was merely purified in India, or that any of the raw materials necessary for the production of glycine were sourced from the PRC.

- The Department should conclude as it did in the *Preliminary Results* that respondents did not have reviewable transactions of subject merchandise during the POR.

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proprietary information.
[11] *See* Kumar's Verification Report at Exhibit 11.
[12] *Id*., at 8 and Exhibits 13 and 16.
[13] *Id*.

GEO's Rebuttal Comments

- Kumar, Ravi, and Rudraa failed to provide evidence during verification that all the glycine they shipped during the POR was Indian-origin glycine.

- The Kumar Verification Report and the respondents' post-verification comments support GEO's assertion that the respondents shipped Chinese-origin glycine during the POR in violation of the Department's circumvention determination.

- The Department's review during verification of two randomly selected sales and Kumar's response to a CF-28 request did not and could not capture all of the U.S. shipments during the POR of AICO's affiliates Kumar, Ravi, and Rudraa.

- The Department should apply punitive measures to respondents for their incorrect no-shipment certifications, which were in violation of the Department's *Circumvention Determination*.

The Respondents' Rebuttal Comments

- Regarding GEO's claim that AICO and/or its affiliates imported Chinese-origin raw materials, Kumar presented documentation during its verification showing that the Ravi partnership was closed in March 2014, and prior to its dissolution, it exported glycine to the United States.[14]

- Further, AICO stopped production in April 2012, and the Department observed the closed plant, inoperable boiler, and that the building that previously contained AICO's operations was converted into a biscuit factory.[15]

- Throughout the proceeding, Kumar has claimed that that they have no knowledge of a company called Rakon Industries. Kumar demonstrated during verification that another party could have created a website linking the Chopra family to Rakon Industries.

Department's Position

After examining the evidence on the record and the parties' arguments, we find that the record does not reflect that Kumar, Ravi, and Rudraa had shipments of subject merchandise (*i.e.*, Chinese-origin glycine) during the POR.

Prior to the *Preliminary Results*, Kumar, Ravi, and Rudraa submitted timely-filed certifications indicating that they had no shipments of subject merchandise into the United States during the POR.[16] CBP did not provide evidence that contradicts these companies' claims of no

[14] *See* Kumar Verification Report at 4.
[15] *Id.*
[16] *See* Letter from Kumar Industries to the Department regarding "Glycine from the People's Republic of China; Statement of No Shipments by Letter from Kumar Industries," dated June 1, 2015; Letter from Ravi Industries to the Department regarding "Glycine from the People's Republic of China; Statement of No Shipments by Ravi

shipments.[17] Further, on May 13, 2015, the Department released to interested parties the results of a CBP query that supported these companies' no-shipment claims.[18]

The Department coordinated with CBP to gather further information and issued specific supplemental questionnaires to the Indian exporters identified by GEO (*i.e.*, Nutracare, Ravi, Kumar, and Rudraa).[19] Based on comments from GEO and information from CBP, including copies of certifications that the merchandise in question was of Indian origin, we asked Ravi, Kumar, and Rudraa specific questions about the information provided by both CBP and GEO. The companies provided responses and documentation which supported their claims regarding the country of origin of the glycine they shipped.[20]

In the *Preliminary Results*, we stated that {b}ased on certifications from Baoding Mantong, Nutracare, Ravi, Kumar, and Rudraa, our analysis of CBP information, and our thorough examination of responses from these companies to our specific requests for additional information, we preliminarily find that Baoding Mantong, Nutracare, Ravi, Kumar, and Rudraa did not ship subject merchandise during the POR."[21] However, we also stated that "the Department continues to consider whether to conduct verification of Kumar, Nutracare, Ravi, and Rudraa."[22] As noted above in the "Background" section, we conducted an on-site verification of Kumar, the glycine producer for respondents Kumar, Ravi, and Rudraa, in August 2016.

Prior to the verification, the Department issued additional supplemental questionnaires, incorporating specific questions about the information provided by GEO.[23] During the

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Industries," dated June 1, 2015; and Letter from Rudraa International to the Department regarding "Glycine from the People's Republic of China; Statement of No Shipments by Rudraa International," dated June 1, 2015.

[17] *See* On June 17 and 18, 2015, we notified CBP that we were in receipt of no-shipment certifications from Kumar, Ravi, and Rudraa and requested CBP to report any contrary information within 10 days. *See* Customs Instructions to Directors of Field Operations, Port Directors, from Director AD/CVD & Revenue Policy & Programs, regarding "No shipments inquiry for glycine from the People's Republic of China produced and/or exported by Kumar Industries (A-570-836) (A-533-975)," dated June 18, 2015; Customs Instructions to Directors of Field Operations, Port Directors, from Director AD/CVD & Revenue Policy & Programs, regarding "No shipments inquiry for glycine from the People's Republic of China produced and/or exported by Ravi Industries (A-570-836) (A-533-975)," dated June 18, 2015; and Customs Instructions to Directors of Field Operations, Port Directors, from "Director AD/CVD & Revenue Policy & Programs, regarding "No shipments inquiry for glycine from the People's Republic of China produced and/or exported by Rudraa International (A-570-836) (A-533-975)," dated June 17, 2015.

[18] *See* Memorandum to the File from Dena Crossland, International Trade Compliance Analyst, Office VI, AD/CVD Operations, Enforcement and Compliance, through Brian C. Davis, Acting Program Manager, Office VI, AD/CVD Operations, Enforcement and Compliance, regarding "2014/2015 Administrative Review of Glycine from the People's Republic of China," dated May 13, 2015 (CBP Data Inquiry).

[19] On February 12, 2016, the Department issued questionnaires to Kumar and Ravi which incorporated various comments we received from GEO on May 20, 2015, and June 8, 2015, to which the companies responded on February 23, 2016. On February 19, 2016, the Department issued questionnaires to Rudraa which incorporated various comments we received from GEO, to which the companies responded on March 3, 2016.

[20] *See* Memorandum to The File from Dena Crossland, International Trade Analyst, AD/CVD Operations, Office VI, through Brian Davis, Acting Program Manager, AD/CVD Operations, Office VI, on the subject of "Analysis Memorandum for the Preliminary Results of the Antidumping Duty Administrative Review of Glycine from the People's Republic of China," dated April 4, 2016.

[21] *Id*.

[22] *See Preliminary Results*.

[23] On May 12, 2016, the Department issued questionnaires to Kumar, Ravi, and Rudraa, which incorporated various

verification, we gathered evidence showing that Kumar owns and operates a full manufacturing facility with equipment necessary to produce glycine from raw materials.[24] Additionally, we observed the raw material inventory, the production process, the packing, and the finished goods inventory of glycine.[25] We randomly selected documents to verify, as is the Department's practice during verification, and found that the documents indicated that the country of origin of the glycine produced by Kumar was India.[26]

Additionally, we extensively reviewed documents pertaining to the affiliations between AICO, Kumar, Ravi, and Rudraa, in addition to any other potential companies. We did not note any discrepancies or affiliation between these respondents and Rakon Industries.[27] The verification found no evidence that the respondents purchased technical grade glycine from the PRC that was merely purified in India, or that any of the raw materials necessary for the production of glycine were sourced from the PRC. As a result of our verification of Kumar, we conclude that Kumar produced Indian-origin glycine from Indian-origin raw materials.

Therefore, based on record evidence and consideration of interested parties' comments, we continue to determine that Kumar, Ravi, and Rudraa did not have any shipments of subject merchandise during the POR.

B. Nutracare/Salvi-Specific Issues

Comment 2: Whether Nutracare/Salvi Had Reviewable Entries of Subject Merchandise during the Period of Review

GEO's Comments

- Salvi misunderstood the purpose of the Department's verification, and the Department should indicate in its final results that its verification of Salvi was unsuccessful and should apply punitive measures to Salvi and Nutracare.

Respondents' Comments

- The verification reports support the Department's *Preliminary Results* that Nutracare did not have shipments of subject merchandise during the POR.[28]

- Salvi owns and operates a full manufacturing facility with equipment necessary to produce glycine from raw materials.

- At Salvi, the Department took photographs of the purchased bags of raw materials

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comments we received from GEO, to which the companies responded on May 27, 2016. On June 29, 2016, the Department issued a questionnaire to Kumar, which incorporated various comments we received from GEO, to which Kumar responded on July 7, 2016.

[24] *See* Salvi Verification Report at 6 and Exhibit VE-16.

[25] *Id*., at 5.

[26] *Id*., at 6

[27] *Id*., at 2-3.

[28] *See Preliminary Determination*.

necessary to produce glycine, the glass reactors, the centrifuge for filtration, and the agitated nutsche.[29]

- The Department also toured the research and development department, the storage facility, and observed the purification process.[30]

- At verification, Salvi provided batch records to show that the small volume of glycine that it sold to Nutracare during the POR, and which Nutracare exported to the United States during the POR, was produced entirely in India from raw materials sourced in India.[31]

- There was no evidence at verification that the respondents purchased technical grade glycine from the PRC that was merely purified in India, or that any of the raw materials necessary for the production of glycine were sourced from the PRC.

- The Department should reach the same conclusion in the final results that it reached in the *Preliminary Results*, namely that the respondents did not have shipments of subject merchandise during the POR.

GEO's Rebuttal Comments

- The respondents failed to provide evidence during verification that all the glycine they shipped during the POR was Indian-origin glycine.

- The verification supports GEO's allegations that the respondents shipped Chinese-origin glycine during the review, which is in violation of the Department's *Circumvention Determination*.

- Contrary to Nutracare/Salvi's assertion, there is no evidence on the record that shows that the small volume of glycine that Salvi sold to Nutracare, and which Nutracare shipped during the POR, was produced entirely in India from raw materials sourced in India.

- There was an evidentiary gap during Nutracare/Salvi's verification, and ultimately the respondents were responsible for supplying supporting documentation for their claims and adjustments during their verification.

- The respondents' verification comments expose gaps in the verification evidence that further supports GEO's record evidence.

- The Department should apply punitive measures to the respondents for their incorrect no-shipment certifications in violation of the Department's *Circumvention Determination*.

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[29] *See* Salvi Verification Report at Exhibit 15.
[30] *Id*., at 5-6.
[31] *Id*., at 7 and Exhibit 14.

The Respondents' Rebuttal Comments

- During verification, Salvi explained that it has not produced glycine in any meaningful amounts since the issuance of the results of the circumvention inquiry.

- The minimal amounts of glycine that were exported by Nutracare during the POR were produced in 2013, and the relevant production records were shown to the Department during the verification.[32]

Department's Position

After examining the evidence on the record and the parties' arguments, we find that the record evidence does not indicate that Nutracare/Salvi had shipments of subject merchandise (*i.e.*, Chinese-origin glycine) during the POR.

Prior to the *Preliminary Results*, Nutracare filed an untimely no-shipment certification, and, therefore, we issued it a standard antidumping duty questionnaire on June 12, 2015.[33] On July 6, 2015, Nutracare responded to the Department's questionnaire and stated that it did not have any shipments, sales, exports, or entries of glycine of Chinese origin into the United States during the POR.[34] CBP did not provide evidence that contradicts these companies' claims of no shipments.[35] Further, on May 13, 2015, the Department released to interested parties the results of a CBP query that corroborated these companies' no-shipment claims.[36]

The Department issued a supplemental questionnaire to Nutracare based on comments from GEO and information from CBP.[37] Nutracare provided documentation that supported their

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[32] *See* Salvi Verification Report at 7.
[33] *See* Memorandum to the File from Dena Crossland, International Trade Compliance Analyst, Office VI, regarding "Request to Take Action on Barcode 3280810-01," dated June 3, 2015; Letter from the Department of Commerce to Nutracare International, dated June 4, 2015; and Letter from the Department of Commerce to Nutracare International, dated June 12, 2015.
[34] *See* Letter from Nutracare International to the Department of Commerce regarding "Glycine from the People's Republic of China; Response of Nutracare International to the Questionnaire Dated June 12, 2015," dated July 6, 2015.
[35] *See* On June 17 and 18, 2015, we notified CBP that we were in receipt of no-shipment certifications from Kumar, Ravi, and Rudraa and requested CBP to report any contrary information within 10 days. *See* Customs Instructions to Directors of Field Operations, Port Directors, from Director AD/CVD & Revenue Policy & Programs, regarding "No shipments inquiry for glycine from the People's Republic of China produced and/or exported by Kumar Industries (A-570-836) (A-533-975)," dated June 18, 2015; Customs Instructions to Directors of Field Operations, Port Directors, from Director AD/CVD & Revenue Policy & Programs, regarding "No shipments inquiry for glycine from the People's Republic of China produced and/or exported by Ravi Industries (A-570-836) (A-533-975)," dated June 18, 2015; and Customs Instructions to Directors of Field Operations, Port Directors, from "Director AD/CVD & Revenue Policy & Programs, regarding "No shipments inquiry for glycine from the People's Republic of China produced and/or exported by Rudraa International (A-570-836) (A-533-975)," dated June 17, 2015.
[36] *See* Memorandum to the File from Dena Crossland, International Trade Compliance Analyst, Office VI, AD/CVD Operations, Enforcement and Compliance, through Brian C. Davis, Acting Program Manager, Office VI, AD/CVD Operations, Enforcement and Compliance, regarding "2014/2015 Administrative Review of Glycine from the People's Republic of China," dated May 13, 2015 (CBP Data Inquiry).
[37] On February 19, 2016, the Department issued a questionnaire to Nutracare, which incorporated various comments we received from GEO, to which Nutracare responded on March 3, 2016.

claims about the origin of the glycine they shipped.[38] In the *Preliminary Results*, we stated that we were considering whether to conduct a verification of Nutracare.[39] As noted above in the "Background" section, we conducted an on-site verification of Salvi, the affiliated producer of glycine exported by Nutracare, in August 2016.

Prior to the verification, the Department issued additional supplemental questionnaires, incorporating specific questions about the information provided by GEO.[40] During the verification, we gathered evidence showing that Salvi owns and operates a full manufacturing facility with equipment necessary to produce glycine from raw materials. The Department also toured the research and development department, the storage facility, and observed the purification process.[41] Additionally, we reviewed Salvi's production records, which indicated that the glycine that Salvi sold to Nutracare, and which Nutracare exported to the United States during the POR, was produced entirely in India from raw materials sourced in India.[42]

Although, as noted by GEO, Salvi had issues with its record keeping, the purpose of the verification was to determine whether the glycine that Nutracare shipped during the POR, and which Salvi produced, was Indian-origin glycine. There was no evidence at verification that the respondents purchased technical grade glycine from the PRC that was merely purified in India, or that any of the raw materials necessary for the production of glycine were sourced from the PRC. As a result of our verification of Salvi, we conclude that Salvi produced Indian-origin glycine from Indian-origin raw materials.

Therefore, based on record evidence and consideration of interested parties' comments, we continue to determine that Nutracare did not have any shipments of subject merchandise during the POR.

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[38] *See* Memorandum to The File from Dena Crossland, International Trade Analyst, AD/CVD Operations, Office VI, through Brian Davis, Acting Program Manager, AD/CVD Operations, Office VI, on the subject of "Analysis Memorandum for the Preliminary Results of the Antidumping Duty Administrative Review of Glycine from the People's Republic of China," dated April 4, 2016.
[39] *See Preliminary Results*.
[40] On May 12, 2016, the Department issued questionnaires to Nutracare, which incorporated various comments we received from GEO, to which Nutracare responded on May 27, 2016. On June 29, 2016, the Department issued a questionnaire to Salvi/Nutracare, which incorporated various comments we received from GEO, to which the companies responded on July 11, 2016.
[41] *Id*. at 5-6.
[42] *Id*. at 7 and Exhibit 14.

VI. Recommendation

Based on our analysis of the comments received, we recommend adopting the positions set forth above. If these recommendations are accepted, we will publish the final results of review for all companies subject to this administrative review in the *Federal Register*.

Agree ✓ Disagree_____

Paul Piquado
Assistant Secretary
for Enforcement and Compliance

12 OCTOBER 2016
Date