



A-201-845
2019 Sunset Review
Public Document
ITA/E&C/P&N/OP/BAU: Team

March 31, 2020

MEMORANDUM TO: Jeffrey I. Kessler
Assistant Secretary
for Enforcement and Compliance

FROM: Joseph Laroski 
Deputy Assistant Secretary
for Policy and Negotiations
Enforcement and Compliance

SUBJECT: Issues and Decision Memorandum for the Expedited First Sunset
Review of the Agreement Suspending the Antidumping Duty
Investigation on Sugar from Mexico; Final Results

Summary

We have analyzed the substantive responses of interested parties in the expedited first sunset review of the Agreement Suspending the Antidumping Duty Investigation on Sugar from Mexico (Agreement) and the suspended antidumping duty (AD) investigation.¹ We received no substantive responses from respondent interested parties. Accordingly, we conducted an expedited (120-day) sunset review pursuant to section 751(c)(3)(B) of the Tariff Act of 1930, as amended (the Act), and 19 CFR 351.218(e)(1)(ii)(C)(2). We recommend that you approve the positions we have developed in the “Discussion of the Issues” section of this memorandum. Below is the complete list of the issues in this expedited final sunset review for which we received substantive responses by domestic interested parties only:

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

¹ See *Sugar from Mexico: Suspension of Antidumping Investigation*, 79 FR 78039 (December 29, 2014) (Agreement).

Scope of the Agreement

The merchandise subject to the Agreement is raw and refined sugar of all polarimeter readings derived from sugar cane or sugar beets. The chemical sucrose gives sugar its essential character. Sucrose is a nonreducing disaccharide composed of glucose and fructose linked by a glycosidic bond via their anomeric carbons. The molecular formula for sucrose is C₁₂H₂₂O₁₁; the International Union of Pure and Applied Chemistry (IUPAC) International Chemical Identifier (InChI) for sucrose is 1S/C12H22O11/c13-1-4-6(16)8(18)9(19)11(21-4)23-12(3-15)10(20)7(17) 5(2-14)22-12/h4-11,13-20H,1-3H2/t4-,5-,6-,7-,8+,9-,10+,11-,12+/m1/s1; the InChI Key for sucrose is CZMRCDWAGMRECN-UGDNZRGBSA-N; the U.S. National Institutes of Health PubChem Compound Identifier (CID) for sucrose is 5988; and the Chemical Abstracts Service (CAS) Number of sucrose is 57-50-1.

Sugar includes products of all polarimeter readings described in various forms, such as raw sugar, estandar or standard sugar, high polarity or semi-refined sugar, special white sugar, refined sugar, brown sugar, edible molasses, de-sugaring molasses, organic raw sugar, and organic refined sugar. Other sugar products, such as powdered sugar, colored sugar, flavored sugar, and liquids and syrups that contain 95 percent or more sugar by dry weight are also within the scope of this Agreement.

Merchandise covered by this Agreement is typically imported under the following headings of the HTSUS: 1701.12.1000, 1701.12.5000, 1701.13.1000, 1701.13.5000, 1701.14.1000, 1701.14.5000, 1701.91.1000, 1701.91.3000, 1701.99.1010, 1701.99.1025, 1701.99.1050, 1701.99.5010, 1701.99.5025, 1701.99.5050, and 1702.90.4000.

The scope of the Agreement excludes sugar imported under the Refined Sugar Re-Export Programs of the U.S. Department of Agriculture, sugar products produced in Mexico that contain 95 percent or more sugar by dry weight that originated outside of Mexico, inedible molasses (other than inedible desugaring molasses noted above), beverages, candy, certain specialty sugars, and processed food products that contain sugar (e.g., cereals). Specialty sugars excluded from the scope of this Agreement are limited to the following: Caramelized slab sugar candy, pearl sugar, rock candy, dragees for cooking and baking, fondant, golden syrup, and sugar decorations.²

History of the Agreement

On March 28, 2014, the Department of Commerce (Commerce) published in the *Federal Register* a notice of initiation of the antidumping duty investigation on sugar from Mexico.³ On May 12, 2014, the U.S. International Trade Commission (ITC) issued an affirmative preliminary injury determination.⁴ On December 19, 2014, Commerce signed an agreement under section 734(c) of the Act with a representative of Mexican producers/exporters accounting for

² *Id.*

³ See *Sugar from Mexico: Initiation of Antidumping Duty Investigation*, 79 FR 22795 (April 24, 2014).

⁴ See International Trade Commission, "Sugar from Mexico Investigation Nos. 701-TA-513 and 731-TA-1249 (Preliminary)", May 12, 2014.

substantially all imports of sugar from Mexico, suspending the AD investigation on sugar from Mexico.⁵ An agreement was also reached between Commerce and the Government of Mexico (GOM), in the companion countervailing duty (CVD) investigation to restrict the volume of direct or indirect exports to the United States in order to prevent the suppression or undercutting of price levels of United States produced sugar.⁶ On September 23, 2015, Commerce issued an affirmative final determination that sugar from Mexico was being sold at less-than-fair-value by a weighted-average dumping margin of up to 42.14 percent.⁷

On June 30, 2017, Commerce and a representative of the Mexican sugar producers/exporters accounting for substantially all imports of sugar from Mexico signed an amendment to the Agreement (2017 Amendment).⁸ The 2017 Amendment was terminated on December 6, 2019, in accordance with a ruling by the Court of International Trade (CIT)⁹, resulting in the unamended Agreement being put into force and becoming effective on December 7, 2019. On January 15, 2020, Commerce and a representative of the Mexican sugar producers/exporters accounting for substantially all imports of sugar from Mexico signed an amendment to the Agreement (2020 Amendment).¹⁰

Background

On December 3, 2019, Commerce published the notice of initiation of the first sunset review of the Agreement, pursuant to section 751(c)(2) of the Act.¹¹ We received notice of intent to participate in the review from the following parties: Imperial Sugar Company (Imperial Sugar) and the American Sugar Coalition (ASC).¹² Commerce received complete substantive responses from the domestic interested parties within the 30-day deadline specified in 19 CFR 351.218(d)(3)(i).¹³ We received and rejected comments from the Sweetener Users Association (SUA), filed on January 21, 2020 and January 23, 2020¹⁴, on the basis of untimely submission.¹⁵

⁵ See *Agreement*, 79 FR 78040-41.

⁶ See *Sugar From Mexico: Suspension of Countervailing Duty Investigation*, 79 FR 78044 (December 29, 2014).

⁷ See *Sugar from Mexico: Final Determination of Sales at Less than Fair Value*, 80 FR 57341 (September 23, 2015) (*Final Determination*).

⁸ See *Sugar from Mexico: Amendment to the Agreement Suspending the Antidumping Duty Investigation*, 82 FR 31945 (July 11, 2017) (2017 Amendment).

⁹ See *Sugar from Mexico: Notice of Termination of Amendment to the Agreement Suspending the Antidumping Duty Investigation*, 84 FR 67711, 67712 (December 11, 2019).

¹⁰ See *Sugar from Mexico: Amendment to the Agreement Suspending the Antidumping Duty Investigation*, 85 FR 3620 (January 22, 2020).

¹¹ See *Initiation of Five-Year (Sunset) Reviews*, 84 FR 58687 (November 1, 2019); see also *Initiation of Five-Year (Sunset) Review; Correction*, 84 FR 66153 (December 3, 2019).

¹² See Letter, “Sugar from Mexico: Notice of Intent to Participate”, dated December 18, 2019; Letter, “Sugar from Mexico, Case Nos. C-201-846 and A-201-845 (Five-Year Sunset Reviews): Notice of Intent to Participate”, dated December 18, 2019.

¹³ See Letter from ASC, “Sugar from Mexico: Substantive Response to Notice of Initiation of Five-Year (Sunset) Reviews of the Antidumping and Countervailing Duty Suspension Agreements,” dated January 2, 2020; Letter from Imperial Sugar, “Sugar from Mexico: Substantive Response of the Imperial Sugar Company to Commerce’s Notice of Initiation of Five-Year (“Sunset”) Reviews”, dated January 2, 2020.

¹⁴ See Letter to Wilbur Ross, Secretary of Commerce, from Sweetener Users Association, “Sugar from Mexico” (January 23, 2020).

¹⁵ See Letter, “Rejection on January 21 and January 23 Filings”, dated February 5, 2020.

We received no substantive responses from any other interested parties, nor was a hearing requested. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), Commerce has conducted an expedited (120-day) sunset review of the Agreement and the suspended AD investigation.¹⁶

There have been no related findings or rulings (*e.g.*, changed circumstances reviews) issued with respect to the suspended investigation. There has been one scope ruling with respect to the suspended investigation.¹⁷ In addition, Commerce completed an administrative review of the Agreement, concluding that the selected respondents were in compliance.¹⁸

Discussion of the Issues

Legal Framework

In accordance with section 751(c)(1) of the Act, Commerce is conducting this sunset review to determine whether termination of the Agreement and the suspended investigation 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, Commerce 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 the period after, the issuance of the antidumping duty order or the acceptance of the suspension agreement. When analyzing import volumes for subsequent sunset reviews, Commerce'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.¹⁹ In accordance with the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action,²⁰ the House Report,²¹ and the Senate Report,²² Commerce's determination of likelihood will be made on an order-wide (or suspension agreement-wide) basis, rather than on a company-specific basis.²³ In addition, Commerce normally determines that revocation of an AD order or termination of a suspension agreement, as appropriate, is likely to lead to continuation or recurrence of dumping when, among other scenarios: (a) dumping continued at any level above *de minimis* after the issuance of the order or suspension agreement; (b) imports of the subject merchandise ceased after issuance of the order or suspension agreement; or (c) dumping was eliminated after the issuance of the order or

¹⁶ See Letter, "Sunset Reviews Initiated on December 2, 2019", dated January 22, 2020.

¹⁷ See Memorandum to P. Lee Smith, Deputy Assistant Secretary, "Amended Agreements Suspending the Antidumping and Countervailing Duty Investigations on Sugar from Mexico: Final Scope Ruling on Scope Clarification Request for U.S.-Produced Sugar Repackaged in Mexico," (September 3, 2019).

¹⁸ See *Agreement Suspending the Antidumping Duty Investigation on Sugar From Mexico (as Amended)*; *Final Results of 2017 Administrative Review*, 84 FR 25752 (June 4, 2019)

¹⁹ See *Ferrovaniadium 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 at "Legal Framework."

²⁰ See Statement of Administrative Action, H.R. Doc. 103-316, vol. 1 (1994) (SAA).

²¹ See House Report, H. Rep. No. 103-826, pt. 1 (1994) (House Report), reprinted in 1994 U.S.C.C.A.N. 4040 (1994).

²² See Senate Report, S. Rep. No. 103-412 (1994) (Senate Report), reprinted in 1994 U.S.C.C.A.N. 3773 (1994).

²³ See SAA at 879; House Report at 56.

suspension agreement and import volumes for the subject merchandise declined significantly.²⁴

Alternatively, Commerce normally will determine that revocation of an AD order or termination of a suspension agreement, as appropriate, would not be likely to lead to continuation or recurrence of dumping where dumping margins declined or were eliminated and import volumes remained steady or increased after issuance of the order or suspension agreement.²⁵ In addition, as a base period of import volume comparison, it is Commerce's practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level of pre-order or pre-suspension agreement import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew the comparison.²⁶

Commerce has also explained that the data pertaining to weighted-average dumping margins and import volumes may not be conclusive in determining the likelihood of future dumping.²⁷ Thus, in the context of the sunset review of a suspended investigation, Commerce may be more likely to take other factors into consideration, provided good cause is shown. Therefore, in accordance with 752(c)(2) of the Act, Commerce shall also consider such other price, cost, market, or economic factors as it deems relevant when good cause is shown.

Further, section 752(c)(3) of the Act states that Commerce shall provide to the ITC the magnitude of the margin of dumping likely to prevail if the order is revoked or the suspension agreement is terminated. Section 752(c)(3) also instructs that Commerce "shall normally choose a margin that was determined under section 735 or under subsection (a) or (b)(1) of section 751." Generally, Commerce selects the AD 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 or a suspension agreement, as appropriate, in place.²⁸ However, in some instances a more recently calculated rate may be more appropriate.²⁹

In February 2012, Commerce announced that it was modifying its practice in sunset reviews such that it would not rely on weighted-average dumping margins that were calculated using the methodology found to be World Trade Organization (WTO)-inconsistent, *i.e.*, zeroing/the denial of offsets.³⁰ In the *Final Modification for Reviews*, Commerce stated that "only in the most extraordinary circumstances" would it rely on margins other than those calculated and published

²⁴ See SAA at 889-90; House Report at 63-64; Senate Report at 52; 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 Bulletin*).

²⁵ See SAA at 889-90; House Report at 63; and Senate Report at 52.

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 SAA at 890.

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.

²⁹ See SAA at 890-891.

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*).

in prior determinations, pursuant to 19 CFR 351.218(e)(2).³¹ To that end, Commerce 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 Commerce to determine that revocation of an AD order or termination of a suspension agreement would not be likely to lead to a continuation or recurrence of sales at less than fair value.

We address the comments received from interested parties below.

1. Likelihood of Continuation or Recurrence of Dumping

Imperial Sugar’s Comments

Imperial Sugar begins its comments by providing information on the subject merchandise, proof of willingness to participate and summary of historical participation, and procedural history on the AD case. Imperial Sugar states that the decline in the import volumes of sugar from Mexico demonstrates that the termination of the suspended AD investigation would likely lead to the continuation or recurrence of dumping as exporters would no longer have to abide by the terms of the Agreement.³³ Imperial Sugar includes data from 2013 to 2018 for the U.S. Annual Imports of Sugar from Mexico, offering that import volumes in 2018 are continuously lower than those in 2013, by over 42 percent.³⁴

Imperial Sugar also reserved the right to submit factual information with respect to “other factors”, provided under section 752(c)(2) of the Act, if Commerce were to conduct a full sunset review. As this review is expedited, no such information was received.

ASC’s Comments

In its substantive response, ASC offers domestic interested party information, legal counsel information, information on the subject merchandise and country subject to review, proof of willingness to participate in the sunset review, and determinations regarding both AD and CVD cases. Similar to Imperial Sugar, ASC argues that dumping has continued at levels above *de minimis* since the suspension of the investigation. ASC states that in accordance with the Act,

³¹ *Id.*

³² *Id.*

³³ See Letter from Imperial Sugar, “Sugar from Mexico: Substantive Response of the Imperial Sugar Company to Commerce’s Notice of Initiation of Five-Year (“Sunset”) Reviews”, dated January 2, 2020.

³⁴ *Id.* at 13.

the Agreement provides for the elimination of only 85 percent of dumping. Specifically, “for each entry of each exporter, the amount by which the estimated normal value exceeds the export price (or constructed export price) will not exceed 15 percent of the weighted-average amount by which the estimated normal value exceeded the export price (or constructed export price) for all less-than-fair-value entries of the producer/exporter examined during the course of the investigation.”³⁵ In the administrative review, ASC argues that Commerce demonstrated that 85 percent of the dumping had been eliminated,³⁶ allowing for dumping to have continued at levels up to 15 percent of the weighted-average amount since the suspension of the investigation.

In addition, according to data provided by ASC, imports of sugar from Mexico have significantly declined, indicating that Mexican producers and exporters of subject imports are less willing to participate in the U.S. market at prices subject to the terms of the Agreement, including the elimination of 85 percent of dumping from the investigation.³⁷ ASC states that the decline in imports should serve as sufficient evidence that dumping will likely continue/recur if the suspended AD investigation were to be terminated.

Commerce’s Position

As explained in the Legal Framework section above, when determining whether termination of a suspended investigation would be likely to lead to a continuation or recurrence of dumping, sections 752(c)(1)(A)-(B) of the Act instruct Commerce 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 or the acceptance of the suspension agreement. “{D}eclining import volumes accompanied by the continued existence of dumping margins after the issuance of {a suspension agreement} may provide a strong indication that, absent {a suspended investigation}, dumping would be likely to continue, because the evidence would indicate that the exporter needs to dump to sell at pre- {suspended investigation} volumes.”³⁸

Commerce also explained that the data pertaining to weighted-average dumping margins and import volumes may not be conclusive in determining the likelihood of future dumping.³⁹ Thus, in the context of the sunset review of a suspended investigation, Commerce may be more likely to take other factors into consideration, provided good cause is shown. Therefore, in accordance with 752(c)(2) of the Act, Commerce shall also consider such other price, cost, market, or economic factors as it deems relevant when good cause is shown. However, Commerce determines that other factors are not relevant in this case because the record evidence is dispositive. Namely, we agree with ASC and Imperial Sugar that there have been declining

³⁵ See *Agreement Suspending the Antidumping Duty Investigation on Sugar from Mexico (as Amended); Final Results of 2017 Administrative Review*, 84 FR 25752 (June 4, 2019) and accompanying Issues and Decision Memorandum at 5.

³⁶ *Id.*

³⁷ See Letter from ASC, “Sugar from Mexico: Substantive Response to Notice of Initiation of Five-Year (Sunset) Reviews of the Antidumping and Countervailing Duty Suspension Agreements,” dated January 2, 2020 (ASC Substantive Response) at 9.

³⁸ See SAA at 889.

³⁹ *Id.* at 890.

volumes accompanied by the fact that the Agreement only requires elimination of 85 percent of the dumping. Specifically, the record evidence from the 2017 administrative review includes Commerce’s finding that the respondents have demonstrated that 85 percent of the dumping has been eliminated during the period of review,⁴⁰ allowing for dumping to have continued at levels up to 15 percent of the weighted-average amount since the suspension of the investigation.

With respect to dumping margins, Commerce calculated weighted-average dumping margins in its final determination of the investigation of 40.48 percent for FEESA, 42.14 percent for Ingenio Tala S.A. de C.V. and certain affiliated sugar mills of Grupo Azucarero Mexico S.A. de C.V. (the Gam Group), and 40.74 percent for all other exporters of the subject merchandise. No more recently calculated margins exist. As such, we find the weighted-average dumping margins determined in the suspended investigation demonstrative of the behavior of Mexican sugar manufacturers, producers, and exporters without the discipline of a suspension agreement in place.

Regarding import levels, import data released by the ITC indicate that imports declined significantly following the issuance of the Agreement.⁴¹ Commerce finds that, in the five years following the investigation, imports remained significantly lower than in 2013, the year prior to filing of the petition. Indeed, imports in each year up through 2019 were roughly less than half of the pre-petition import volume.⁴²

Based on this information, Commerce finds that the continued decrease in import volumes after the issuance of the Agreement, as well as possible continued dumping of up to 15 percent, are highly probative of the likelihood of continuation or recurrence of dumping. Declining import volumes after the issuance of the Agreement provide a strong indication that, absent the Agreement, dumping would be likely to continue or recur if the Agreement were terminated.⁴³

2. Magnitude of Margin Likely to Prevail

Imperial Sugar’s Comments

Regarding the magnitude of the AD margin likely to prevail, Imperial Sugar argues that the dumping margins determined in the AD investigation are above *de minimis*. In addition, Imperial Sugar stated that the antidumping margins reported to the ITC by Commerce, as those likely to prevail if the suspended investigation were to be terminated, should be the margins from the original 2014 AD investigation. As stated previously, these margins are 40.48 percent for FEESA; 42.14 percent for the GAM Group; and 40.74 percent for All Others.⁴⁴

⁴⁰ See Issues and Decision Memorandum at 5.

⁴¹ See Appendix I (ITC DataWeb import statistics).

⁴² *Id.*

⁴³ See section 752(c)(1) of the Act; SAA at 889-90; House Report at 63-64; *Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products From the Russian Federation; Final Results of the Expedited Sunset Review of the Antidumping Duty Suspended Investigation*, 75 FR 47263 (August 5, 2010), and accompanying Issues and Decision Memorandum at “Likely Effects of Termination of the Suspension Agreement and Underlying Investigation.”

⁴⁴ See *Final Determination*, 80 FR at 57342.

ASC's Comments

Similar to Imperial Sugar, ASC states in its substantive review that because the only existing AD margins were calculated in the original investigation, Commerce should “follow its normal practice and, consistent with its final AD determination, find that the AD rates likely to prevail would be up to 42.14 percent, or could alternatively select rates from the investigation for each of the subject producers as indicated in the Agreement.”⁴⁵

Department's Position

As discussed in the Legal Framework section above, section 752(c)(3) of the Act provides that Commerce shall provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order is revoked, or a suspension agreement is terminated. Normally, Commerce will provide to the ITC the company-specific, weighted-average AD margin from the investigation for each company. Commerce's preference for selecting a rate from the investigation is based on the fact that it is the only calculated rate that reflects the behavior of exporters without the discipline of an order or suspension agreement in place.

For this first sunset review, Commerce has determined that the AD margin established in the original investigation, of up to 42.14 percent, is representative of the magnitude of the margin of dumping most likely to prevail if the Agreement and suspended investigation were terminated. This dumping margin is a rate from the investigation and no new margins have been calculated in subsequent administrative reviews. We further determine that Commerce can continue to rely on this dumping margin because, as noted by Imperial Sugar and ASC, the rate from the investigation is consistent with the *Final Modification for Reviews* because it was based on the best information available derived from the rates alleged in the petition and did not involve zeroing/the denial of offsets. Accordingly, we find it appropriate to provide the ITC with the rate from the final determination in the investigation because this rate best reflects the behavior of exporters without the discipline of the Agreement in place.

FINAL RESULTS OF EXPEDITED REVIEW

We determine that termination of the Agreement and the suspended AD investigation on sugar from Mexico would be likely to lead to the continuation or recurrence of dumping, and that the magnitude of the margin of dumping likely to prevail would be up to 42.14 percent.

⁴⁵ See ASC Substantive Response at 13.

RECOMMENDATION

Based on our analysis of the substantive responses received and the record evidence, we recommend adopting the above positions. If these recommendations are accepted, we will publish the final results of review in the *Federal Register* and notify the ITC of our determination.

Agree

Disagree

3/31/2020

X



Signed by: JEFFREY KESSLER

Jeffrey I. Kessler
Assistant Secretary
for Enforcement and Compliance

Appendix I

Mexican Sugar: First Unit of Quantity by Customs Value for Mexico

U.S. Imports for Consumption

	2013	2014	2015	2016	2017	2018	2019
	Kilograms						
	2,093,302,542	1,370,754,913	1,397,085,177	1,120,944,236	950,145,829	1,063,248,508	886,048,467
	Liters						
	0	157,385	0	0	0	0	0
Totals:	2,093,302,542	1,370,912,298	1,397,085,177	1,120,944,236	950,145,829	1,063,248,508	886,048,467

Sources: USITC Interactive Tariff and Trade DataWeb at <http://dataweb.usitc.gov/>;
 Per USITC DataWeb report: “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.”