DOC Inv. No. A-583-882
USITC Inv. Nos. 731-TA-____
Total Pages: 219

PUBLIC VERSION
Business Proprietary Information Removed From
Pages iii, 1-5, 8 and
Exhibits IV-1 – IV-3, IV-5, IV-7 – IV-9, IV-11, IV-19

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

In the Matter of	)	**PETITIONS FOR THE IMPOSITION OF ANTIDUMPING DUTIES**
POLYTETRAMETHYLENE ETHER GLYCOL FROM CHINA, SOUTH KOREA, TAIWAN, AND VIETNAM	)	**VOLUME IV: TAIWAN ANTIDUMPING DUTIES**

Petitioner:
BASF Corporation

Stephen J. Orava
Daniel L. Schneiderman
Patrick J. McLain
Victor Leite
Joseph Grossman-Trawick
Edmond O'Neill, Consultant
Richard Lutz, Consultant
Ivan Gonzales, Consultant

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April 8, 2026

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LIST OF EXHIBITS

I. ALLEGATION OF SALES AT LESS THAN FAIR VALUE

This petition filed by BASF Corporation ("BASF" or "Petitioner") seeks the imposition of antidumping duties on imports of Polytetramethylene Ether Glycol ("subject merchandise" or "PTMEG") from Taiwan. As discussed below, the Taiwanese producers and exporters have sold, or offered for sale, subject merchandise in the United States for less than fair value during the presumptive period of investigation ("POI"), *i.e.*, April 2025 – March 2026. Information showing dumping by the Taiwanese producers is provided in this volume, *i.e.*, Volume IV. The general information required by Section 351.202 of the Department of Commerce's ("Commerce") regulations is provided in Volume I of these petitions.

II. TAIWANESE PRODUCERS AND EXPORTERS OF SUBJECT MERCHANDISE

A. Description Of The Taiwanese Industry

Petitioner has identified two Taiwanese producers or exporters believed to have sold, or offered for sale, PTMEG in the United States for less than fair value. Contact information for these companies is listed in Volume I: General Issues And Injury at **Exhibit I-14**. This list was generated using [

] and ship manifest data published by the U.S. Customs & Border Protection ("CBP") that could be used to identify exporters. According to these sources, there are two producers and exporters of subject merchandise in Taiwan.[1]

[1] *See* [

], provided as **Exhibit IV-1**; *see also* List of Foreign Producers and Exporters, provided as **Exhibit I-14**.

B. Production Processes Of The Taiwanese Producers

A detailed description of the production process used to produce the subject merchandise is contained in Volume I to these petitions. Petitioner believes Dairen Chemical Corporation ("Dairen") accounted for the vast majority of imports of PTMEG from Taiwan during the presumptive period of investigation. The PTMEG production process in Taiwan is comparable to Petitioner's production process. Taiwanese producers are vertically integrated, producing 1,4-butanediol ("BDO"), which is used to produce tetrahydrofuran ("THF").[2] THF is then captively consumed to produce PTMEG via the polymerization of THF with the use of an acid catalyst.[3] Finally, PTMEG is typically blended with a stabilizer and packaged.[4]

C. Known Importers Of Taiwanese Subject Merchandise

A complete list of known U.S. importers of PTMEG, including importers of PTMEG from Taiwan, is contained in Volume I: General Issues And Injury in **Exhibit I-15**. This list was generated using ship manifest data.

III. CALCULATION OF EXPORT PRICE

A. Introduction

The HTSUS subheading covering imports of PTMEG – *i.e.*, 3907.29.00, HTSUS – is inappropriate for determining the export price because it is a basket category that also covers products outside the proposed scope. Accordingly, Petitioner employs two methods of ascertaining export price. The first uses pricing information for individual offers of sale of PTMEG from Taiwan into the United States. The second involves matching an individual

[2] *See* [ ], provided as **Exhibit IV-2**.
[3] *See* Volume I at **Section II.C**.
[4] *See* Volume I at **Section II.C**.

shipment of goods identified in CBP's Automated Manifest System ("AMS") to the U.S. Census data to determine the shipper, consignee, and price of the specific shipment.

B. Export Price Based On Individual Price Quotations

Petitioner obtained actual pricing information for individual offers for sale into the United States that were made by a Taiwanese producer, [ ]. The declaration describing the details of the offers for sale is provided at **Exhibit IV-3**. To determine ex-factory prices in Taiwan, Petitioner deducted ocean freight and insurance expenses by determining the average of such costs on a port of unlading-specific basis from the Official U.S. Customs Import Data.[5] Petitioner deducted foreign inland freight to the port of exportation, as well as foreign brokerage & handling charges. Foreign inland freight is based on the distance between [ ] production facility and the closest port of export in Taiwan. Petitioner deducted inland freight and brokerage and handling charges incurred in Taiwan based on data contained in the World Bank's *Doing Business 2020: Taiwan*.[6] Foreign inland freight and brokerage and handling charges are calculated at **Exhibit IV-4**. The calculation of export price is contained in **Exhibit IV-5**. The resulting export prices were compared to normal value to determine dumping margins.

C. Export Price Based On Ship Manifest Data And Official U.S. Customs Import Statistics

CBP's AMS data contain detailed information regarding goods that arrive at U.S. ports. These data can sometimes be aligned with the Official U.S. Customs Import Data by matching port-specific shipment quantities for specific shipments and certain months. Using this method, Petitioner was able to positively link several shipments of specific grades of PTMEG by Dairen

[5] *See* Ocean Freight, foreign inland freight, and other expenses, provided in **Exhibit IV-4**.
[6] *See* Ocean Freight, foreign inland freight, and other expenses, provided in **Exhibit IV-4**.

to different consignees in the United States. In other words, Petitioner obtained entry-specific prices for Dairen shipments by directly correlating monthly U.S. port-specific import statistics to specific bills of lading reflected in the AMS ship manifest data.

Exhibit IV-6 contains Official U.S. Customs Import Data (obtained through Datamyne) for PTMEG during the period April 2025 through January 2026, as well as data from the AMS database (also obtained through Datamyne) during the same time period identifying PTMEG shipments from Taiwan to the United States entered during the same month and at the same port of entry. Petitioner compared these data and matched several shipments to official U.S. Customs Import Data. By doing so, Petitioner was able to determine the prices paid by several U.S. consignees to Dairen for specific shipments of specific grades of PTMEG.[7]

The pricing data from the Official U.S. Customs database are based on Customs Value, *i.e.*, equivalent to a Free On Board ("FOB") foreign port price. Accordingly, Petitioner deducted foreign inland freight charges and foreign brokerage & handling expenses using the methodologies described in the prior section. The export price calculation is provided in **Exhibit IV-5**.

IV. CALCULATION OF NORMAL VALUE

A. Normal Value Based On Home Market Sales

The Taiwanese home market appears to be viable based on data available to Petitioner.[8] In 2025, Taiwan produced [ ], imported [ ], exported [ ], and consumed [ ].[9] These volumes show that the Taiwanese market was supplied by imported PTMEG and by PTMEG of Taiwanese origin. Assuming,

[7] **Exhibit IV-6** includes a summary of all matches by molecular grade and packing.
[8] *See* [ ], provided as **Exhibit IV-1**.
[9] *See* [ ], provided as **Exhibit IV-1**.

conservatively, that all imports were consumed in Taiwan (i.e., not re-exported), Taiwanese producers sold [ ] of domestically produced PTMEG in their home market, which corresponds to [ ] percent of their total exports.[10] During the same period, Taiwanese producers exported [ ] to the United States.[11] The aggregate volume of PTMEG of Taiwanese origin sold in its home market corresponds to [ ] percent of Taiwanese exports to the United States.[12] Thus, the Taiwanese home market is viable under 19 C.F.R. 351.404(b) because the aggregate quantity of Taiwanese sales in its home market is above 5 percent.[13]

Petitioner obtained pricing information in Taiwan. **Exhibit IV-7** contains a declaration explaining how home market pricing information in Taiwan was obtained. **Exhibit IV-8** contains a cost model calculating the costs of producing PTMEG in Taiwan. This exhibit also contains a declaration from the person who provided these data. **Exhibit IV-9** contains a comparison of the home market price to the cost of production indicating that home market prices net of packing costs were significantly below fully-loaded cost net of packing costs. Accordingly, as explained below, Petitioner based normal value on constructed value ("CV").

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[10] *See* [ ], provided as **Exhibit IV-1**. Calculation: [ ].

[11] *See* [ ], provided as **Exhibit IV-1**.

[12] *See* [ ], provided as **Exhibit IV-1**. Calculation: [ ].

[13] 19 C.F.R. 351.404(b) ("The Secretary will consider the exporting country or a third country as constituting a viable market if . . . sales of the foreign like product in that country are of sufficient quantity to form the basis of normal value. 'Sufficient quantity' normally means that the aggregate quantity . . . of the foreign like product sold by an exporter or producer in a country is 5 percent or more of the aggregate quantity (or value) of its sales of the subject merchandise to the United States.")

B. Normal Value Based On Constructed Value

The PTMEG production process is described in detail in Volume I of these petitions. To the best of Petitioner's knowledge, no publicly available information exists with respect to Taiwanese producers' cost of production. To estimate the cost of production in Taiwan, Petitioner relies on its own production experience in the United States, adjusting for known differences for costs in Taiwan. In particular, Petitioner began with its input usage rates for the various material, labor, and energy ("MLE") requirements. **Exhibit IV-8** contains a cost model and a declaration from the individual who supervised the input factor usage rates. This company is an appropriate producer to use for such estimates because it has a comparable production process to Dairen. Both companies use BDO to produce THF, which is then captively consumed to produce PTMEG. Additionally, all producers employ comparable processes (*i.e.*, polymerization of THF using a catalyst) to make PTMEG.

1. Materials, labor, and energy

Petitioner developed a cost model based on the actual usage rates for MLE used to manufacture PTMEG.[14] The actual usage rates, based on the Petitioner's experience, are presented in **Exhibits III-8c** and **III-8d** at Column A.[15] The factor costs in Taiwan are shown in Column B of the same exhibits.[16] The usage rates are multiplied by the Taiwanese factor costs to determine the total cost of each input used to produce the subject merchandise contained in Column C.

[14] *See* Declaration Regarding Calculation of Cost Of Production and Constructed Value, provided as **Exhibit IV-8**.
[15] *See* Declaration Regarding Calculation of Cost Of Production and Constructed Value, provided as **Exhibit IV-8**.
[16] *See* Declaration Regarding Calculation of Cost Of Production and Constructed Value, provided as **Exhibit IV-8**.

Unit input costs for materials were calculated from Taiwanese import statistics, excluding (per Commerce's practice) imports from non-market economy countries and countries known to have export subsidies.[17] Petitioner determined that the input cost for steel drums derived from Taiwanese import statistics was abnormally high. Petitioner was able to obtain the actual amount paid for steel drums by a Taiwanese chemical manufacturer.[18] Petitioner used this input value to determine the cost of drummed PTMEG. Petitioner determined Labor costs in Taiwan from official labor statistics published by the Taiwanese Government specific to the manufacture of chemical products.[19] The latest available labor rates cover the POI through January 2026.[20] Taiwanese natural gas and electricity rates for extra-large industrial consumers were obtained from globalpetrolprices.com.[21] All unit costs based on New Taiwan Dollar were converted to U.S. dollars using Commerce's exchange rates (supplemented by exchange rates from the Federal Reserve to the extent that Commerce's rates did not cover the entire period of investigation).[22]

The model begins with the processes used to produce acetylene. These costs feed into the production process steps that follow, *i.e.*, production of BDO, which is consumed to produce THF, followed by the polymerization of THF to produce PTMEG. The total input costs at each stage are totaled to calculate the total MLE costs to produce the subject merchandise.

[17] *See* Material Cost Input, provided as **Exhibit IV-10**.
[18] *See* Packing Costs Declaration, provided as **Exhibit III-11**.
[19] *See* Labor Rates, provided as **Exhibit IV-12**.
[20] *See* Labor Rates, provided as **Exhibit IV-12**.
[21] *See* Taiwanese Natural Gas Prices, provided as **Exhibit IV-13**; Taiwanese Natural Gas Prices, provided as **Exhibit IV-14**; Taiwanese Electricity Prices, provided as **Exhibit IV-15**.
[22] *See* New Taiwan Dollar/U.S. Dollar Exchange Rates, provided as **Exhibit IV-16**.

2. Factory overhead, SG&A, and profit

Depreciation, SG&A, and profit rates are based upon Dairen's latest available nonconsolidated audited financial statements.[23] The interest expense ratio was based upon their respective latest available consolidated audited financial statements.[24]

V. CALCULATION OF DUMPING MARGINS

As noted above, home market price is not a viable basis for determining normal value because the available information indicates that home market prices are significantly below cost. Accordingly, Petitioner based normal value on constructed value. Dumping margins based on U.S. price-to-constructed value comparisons range from 165.84 percent to 212.90 percent.[25] For the sake of visibility, Petitioner also provides a comparison of home market price to export price price, recognizing that this is not a valid comparison for the reasons stated above.[26]

VI. MATERIAL INJURY AND THREAT OF MATERIAL INJURY TO THE DOMESTIC INDUSTRY

Petitioner alleges that imports of subject merchandise from Taiwan sold at less than fair value materially injure the domestic industry and threaten to cause further material injury to the domestic industry. The factual information in support of these allegations is provided in Volume I of these petitions.

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[23] *See* Dairen Annual Report, provided as **Exhibit IV-17**.
[24] *See* Financial Ratios, provided as **Exhibit IV-18**.
[25] *See* Dumping Margin Calculations (Price to Constructed Value Comparison), provided as **Exhibit IV-19a**. Petitioner compared the export price to the constructed value by grade and packing type, *i.e.*, [ ].
[26] *See* Dumping Margin Calculations (Price-to-Price Comparison), provided as **Exhibit IV-19b**. Petitioner's price-to-price comparison is limited to the product for which the price quote was obtained, *i.e.*, [ ].

VII. CONCLUSION AND REQUEST FOR INVESTIGATION

As demonstrated above, the Taiwanese producers and exporters of subject merchandise are selling this merchandise for less than fair value in the United States. Accordingly, Petitioner requests that Commerce initiate an antidumping duty investigation of PTMEG from Taiwan.

Respectfully submitted,

/s/ Stephen J. Orava
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April 8, 2026

VIA ELECTRONIC FILING
The Honorable Howard Lutnick
Secretary of Commerce
Attention: Enforcement and Compliance
APO/Dockets Unit, Room 18022
U.S. Department of Commerce
14th Street and Constitution Avenue, NW
Washington, D.C. 20230

The Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112A
Washington, D.C. 20436

DOC Investigation Nos.: A-570-227, A-580-922, A-583-882, A-552-855

USITC Investigation Nos.: 731-TA-____
Total Pages: 2,084
Investigation
AD/CVD Operations

Business Proprietary Information Removed from Volume I from Pages iii, 2-4, 7-13, 15, 18-20, 22, 25, 27, 29-34, 36, 38-40, 42-45, 48-49 and Exhibits I-1, I-2, I-4, I-11, I-13, I-15, I-16, I-19, I-21-25; Volume II at Pages ii, 1-2, 4, and Exhibits II-1 – II-2, II-4, II-6 – II-9, and II-18; Volume III at Pages iii, 1-2, 4, 7 and Exhibits III-2, III-4 – III-8, III-15, III-18; Volume IV at Pages iii, 1-5, 8 and Exhibits IV-1 – IV-3, IV-5, IV-7 –IV-9, IV-11, IV-19; Volume V at Pages ii, 1-2, and Exhibits V-1 – V-2, V-5, V-7 – V-9.

PUBLIC VERSION

Re: Petitions for the Imposition of Antidumping Duties on Imports of Polytetramethylene Ether Glycol from China, South Korea, Taiwan, and Vietnam

Dear Secretary Lutnick and Secretary Barton:

On behalf of BASF Corporation ("Petitioner"), we respectfully submit to the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission (the "Commission") petitions for the imposition of antidumping duties on U.S. imports of polytetramethylene ether glycol ("PTMEG") from China, South Korea, Taiwan, and Vietnam.

Petitioner is a domestic producer of PTMEG and therefore interested party within the meaning of 19 U.S.C. § 1677(9)(C).

Volume I of the petitions contains general information and the allegations of injury, along with associated exhibits. Volume II contains antidumping duty allegations with respect to imports from China. Volume III contains antidumping duty allegations with respect to imports from South Korea. Volume IV contains antidumping duty allegations with respect to imports from Taiwan. Volume V contains antidumping duty allegations with respect to imports from Vietnam. We are submitting proprietary and public versions of Volumes I through V.

Pursuant to 19 C.F.R. §§ 351.202(d) and 351.304 of Commerce's regulations, and 19 C.F.R. § 201.6(b) of the Commission's rules, we request business proprietary treatment for the bracketed information in the narratives and exhibits of these petitions as detailed below. Disclosure of this information, which is not otherwise publicly available, would cause substantial harm to the competitive position of the submitter and would impair the ability of Commerce and the Commission to obtain information in the future necessary to fulfill their statutory functions.

Volume I (General Information and Injury):

Pages iii, 2-4, 7-13, 15, 18-20, 22, 25, 27, 29-34, 36, 38-40, 42-45, 48-49 and Exhibits I-1, I-2, I-4, I-11, I-13, I-15, I-16, I-19, I-21-25: Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. customers, distributors or suppliers, the names of individuals from whom information was obtained, other information of commercial value, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and

other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. §§ 201.6 & 351.105(c)).

Volume II (China AD Allegation):

Pages ii, 1-2, 4, and Exhibits II-1 – II-2, II-4, II-6 – II-9, and II-18: Business or trade secrets concerning the nature of a production process, production and distribution costs, likely sales, and offers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume III (South Korea AD Allegation):

Pages iii, 1-2, 4, 7 and Exhibits III-2, III-4 – III-8, III-15, III-18: Business or trade secrets concerning the nature of a production process, production and distribution costs, likely sales, and offers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume IV (Taiwan AD Allegation):

Pages iii, 1-5, 8 and Exhibits IV-1 – IV-3, IV-5, IV-7 – IV-9, IV-11, IV-19: Business or trade secrets concerning the nature of a production process, production and distribution costs, likely sales, and offers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume V (Vietnam AD Allegation):

Pages ii, 1-2, and Exhibits V-1 – V-2, V-5, V-7 – V-9: Business or trade secrets concerning the nature of a production process, production and distribution costs, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

The requisite certification that substantially identical information is not available to the public is set forth as an attachment to this letter, in accordance with section 201.6(b)(3)(iii) of the Commission's rules. Also attached are the requisite company and counsel certifications regarding the completeness and accuracy of the information contained in the petitions.

Pursuant to section 351.304(b)(1) of Commerce's regulations, Petitioner agrees in principle to permit disclosure of business proprietary information contained in the petitions under an appropriately drawn administrative protective order ("APO"). Petitioner respectfully reserves the right, however, to comment on all APO applications prior to disclosure. A public version of these petitions has been prepared and is being filed simultaneously with this submission pursuant to Commerce's regulations, 19 C.F.R. § 351.304(c)(1), and the Commission's rules, 19 C.F.R. § 201.8(d).

Pursuant to section 351.202(c) of Commerce's regulations, we certify that the petitions and all required copies were filed today with both Commerce and the Commission. The petitions are being filed electronically on Commerce's ACCESS filing system, as well as the Commission's EDIS filing system.

If you have any questions regarding this petition, please contact us.

Respectfully submitted,

/s/ Stephen J. Orava

Stephen J. Orava
Daniel L. Schneiderman
Patrick J. McLain
Victor Leite
Joseph Grossman-Trawick
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Counsel to Petitioner

REPRESENTATIVE CERTIFICATION

I, Stephen J. Orava, with King & Spalding LLP, counsel to BASF Corporation, certify that I have read the attached submission, *Petitions for the Imposition of Antidumping Duties on Imports of Polytetramethylene Ether Glycol from China, South Korea, Taiwan, and Vietnam*, filed on April 8, 2026. In my capacity as Counsel, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD proceedings, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: 
Stephen J. Orava

Date: April 8, 2026

CERTIFICATION OF COUNSEL

City of Washington)
) ss:
District of Columbia)

In accordance with section 201.6(b)(3)(iii) of the Commission's regulations, 19 C.F.R. § 201.6(b)(3)(iii), I, Stephen J. Orava, of King & Spalding LLP, hereby certify that information substantially identical to the information for which we are requesting proprietary treatment in the attached submission is not available to the public.

In accordance with section 207.3(a) of the Commission's regulations, 19 C.F.R. § 207.3(a), I further certify that (1) I have read the attached submission, and (2) the information contained in this submission is accurate and complete to the best of my knowledge.

In addition, I acknowledge that any information submitted to the Commission throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. All contract personnel will sign appropriate nondisclosure agreements.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 8, 2026

Signature: 
Stephen J. Orava

COMPANY CERTIFICATION

I, Timothy Cavanaugh, Ph. D., Business Director, Butanediol and Derivatives, at BASF Corporation, certify that I prepared or otherwise supervised the preparation of the attached submission, *Petitions for the Imposition of Antidumping Duties on Imports of Polytetramethylene Ether Glycol from China, South Korea, Taiwan, and Vietnam*, filed on April 8, 2026. I certify that the public information and any business proprietary information of BASF Corporation contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce and the International Trade Commission. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD proceedings, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: 

Timothy Cavanaugh, Ph. D.

Date: 3/30/26

DOC Inv. Nos. A-570-227, A-580-922, A-583-882, A-552-855
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Total Pages: 197

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

In the Matter of	**PETITIONS FOR THE IMPOSITION OF ANTIDUMPING DUTIES**
POLYTETRAMETHYLENE ETHER GLYCOL FROM CHINA, SOUTH KOREA, TAIWAN, AND VIETNAM	**VOLUME I: GENERAL ISSUES AND INJURY**

Petitioner:
BASF Corporation

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Daniel L. Schneiderman
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April 8, 2026

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PETITIONS FOR THE IMPOSITION OF ANTIDUMPING DUTIES ON IMPORTS OF POLYTETRAMETHYLENE ETHER GLYCOL FROM CHINA, SOUTH KOREA, TAIWAN, AND VIETNAM

VOLUME I: GENERAL ISSUES AND INJURY

I. INTRODUCTION

These petitions are filed by BASF Corporation ("BASF" or "Petitioner") with the International Trade Administration of the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission (the "Commission") pursuant to Section 731 of the Tariff Act of 1930, as amended ("the Act"), 19 U.S.C. § 1673. Petitioner is the only domestic producer of Polytetramethylene Ether Glycol ("PTMEG"), the product covered by these investigations.[1]

Petitioner alleges that the producers and exporters of PTMEG in China, South Korea, Taiwan, and Vietnam are selling subject merchandise at less than fair value in the United States within the meaning of Section 731 of the Act.[2] Volumes II through V of the petitions contain the information supporting Petitioner's allegations of dumping of PTMEG from China, South Korea, Taiwan, and Vietnam.

Finally, Petitioner alleges that dumped imports from the subject countries are materially injuring the domestic industry and that they threaten the domestic industry with further material injury. The evidence demonstrates that the subject producers in the subject countries have used less than fair value pricing to take significant volumes of sales and market share from the domestic industry since 2023 and that the subject imports have severely harmed domestic prices, which have fallen significantly since 2023.

[1] For the full scope of these investigations, *see* **Section II.C.4.** of this volume.
[2] *See* 19 U.S.C. § 1673.

Moreover, the evidence presented in these petitions shows that the rapidly growing volumes of low-priced, unfairly traded imports from China, South Korea, Taiwan, and Vietnam have had a [ ] adverse impact on the overall condition of the petitioner, whose net sales, market share, and profitability levels have all fallen [ ] from 2023 to 2025. Additionally, since 2024, there have been significant declines in the petitioner's production volumes, U.S. shipment volumes, and sales revenues. Accordingly, the available evidence establishes that the subject imports have materially injured the domestic industry producing PTMEG.

In addition, the available evidence indicates that subject imports from China, South Korea, Taiwan, and Vietnam threaten additional injury to the domestic industry. In this regard, the available evidence indicates that the subject countries have ample amounts of available capacity that can be used to increase their already significant exports of PTMEG to the United States in the imminent future. Moreover, they rely heavily on exports to maintain their capacity utilization rates, which is a critical factor for this capital-intensive industry. Finally, they have a track record of using very low pricing to rapidly increase their sales to the U.S. market, which harms domestic pricing and profitability levels.

In sum, the available evidence indicates that, in the absence of trade relief, the subject producers in China, South Korea, Taiwan, and Vietnam will continue to ship large volumes of low-priced PTMEG to the U.S. market and that these volumes will continue to have a devastating impact on the domestic industry. It is therefore critical that the domestic industry obtain trade relief from the onslaught of unfairly traded imports from these countries in recent years. Absent sufficient relief, U.S. PTMEG production will no longer be sustainable, resulting

in the consequent loss of American manufacturing capacity and jobs and making another U.S. supply chain entirely dependent on imports from foreign sources.

As we noted above, this volume contains general information relating to the antidumping duty petitions against China, South Korea, Taiwan, and Vietnam, as well as required information concerning material injury and threat of material injury to the domestic industry. The allegations contained in this volume consist of information that is reasonably available to Petitioner. The petitions are being filed in conformity with the requirements of Section 351.202 of Commerce's regulations[3] and Section 207.11 of the Commission's regulations.[4]

II. GENERAL INFORMATION

A. Petitioner And Degree Of Industry Support For The Petition

1. The Petitioner

BASF, the Petitioner in these investigations, is the only producer of PTMEG in the United States. As a domestic producer of the domestic like product, BASF is an interested party within the meaning of 19 U.S.C. § 1677(9)(C).[5] The contact information for Petitioner is set forth below:

BASF Corporation
Address: 100 Park Avenue, Florham Park, NJ 07932
Phone: [ ]
Contact Name and Title: [ ]
Contact Email: [ ]
Website: www.basf.com/us

[3] *See generally* 19 C.F.R. § 351.202.
[4] *See generally* 19 C.F.R. § 207.11(b)(2)(i).
[5] This provision defines "interested party" to include "a manufacturer, producer, or wholesaler in the United States of a domestic like product."

2. Industry support for the petitions[6]

Under 19 U.S.C. § 1673a(c)(4)(A), Commerce must determine whether there is sufficient industry support for an antidumping duty petition. Under the statute, Commerce will find that a petition has sufficient industry support if: (1) the domestic producers or workers who support the petition account for at least 25 percent of the total production of the domestic like product; and (2) the domestic producers or workers who support the petition account for more than 50 percent of the production of the domestic like product made by that portion of the industry expressing support for or opposition to the petition.[7] In these investigations, Petitioner has accounted for 100 percent of U.S. production of PTMEG during the entire period relevant to Commerce's industry support analysis.[8] Petitioner therefore satisfies both industry support requirements under the statute.

B. Related Proceedings And Previous Requests For Relief[9]

Petitioner has not previously filed for antidumping or countervailing duty relief from imports of PTMEG under Sections 701 and 731 of the Act. Furthermore, Petitioner has not previously filed for trade relief from imports of PTMEG pursuant to Section 337 of the Act, Sections 201 or 301 of the Trade Act of 1974, or Section 232 of the Trade Expansion Act of 1962. However, imports of PTMEG have been subject to additional duties as described below.

Section 301. In April 2018, the U.S. Trade Representative ("USTR") determined that acts, policies, and practices of the Government of China related to technology transfer,

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[6] *See* 19 C.F.R. § 351.202(b)(3). 19 C.F.R. § 351.202(b)(3)(i) asks for "the total volume and value of U.S. production of the domestic like product."
[7] *See* 19 U.S.C. § 1673a(c)(4)(A).
[8] [ ], provided as **Exhibit I-1**; *see also* Domestic Industry Support, provided as **Exhibit I-2**.
[9] *See* 19 C.F.R. § 351.202(b)(4).

intellectual property, and innovation were unreasonable or discriminatory and burden or restrict U.S. commerce.[10] In response to these acts, policies, and practices, USTR used its authority under Section 301 of the Trade Act of 1974, as amended, ("Section 301") to impose an additional 10 percent *ad valorem* duty on imports of certain products from China.[11] The list included Harmonized Tariff Schedule of the United States ("HTSUS") number 3907.20.00,[12] which previously covered the product within the scope of this investigation before it was redesignated as subheading 3907.29.00. USTR subsequently increased the rate of the additional duty applicable to the tariff subheadings covered by Section 301 duties announced in September 2018 from 10 percent to 25 percent.[13] These duties remain in place today.[14]

[10] *See Notice of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 14906 (USTR Apr. 6, 2018).
[11] *See Notice of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 28710 (USTR Jun. 20, 2018); *Notice of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 40823 (USTR Aug. 16, 2018); *Notice of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation,* 83 Fed. Reg. 47974 (USTR Sep. 21, 2018).
[12] Effective January 27, 2022, subheading 3907.20.00 was redesignated as subheadings 3907.21.00 and 3907.29.00. PTMEG is now classifiable under HTSUS 3907.29.00. *See* Proclamation 10326 of December 23, 2021, *To Modify the Harmonized Tariff Schedule of the United States and for Other Purposes*, 86 Fed. Reg. 73593 (Exec. Off. Pres. Dec. 28, 2021) (adopting U.S. International Trade Commission, *Modifications to the Harmonized Tariff Schedule of the United States under Section 1206 of the Omnibus Trade and Competitiveness Act of 1988 and for Other Purposes*, Publication No. 5240 (Dec. 2021)).
[13] *See Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation,* 83 Fed. Reg. 65198 (USTR Dec. 19, 2018). *See also Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 7966 (USTR Mar. 5, 2019) (modifying the effective date for the increase in duties to May 10, 2019), *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (USTR May 9, 2019).
[14] Since the imposition of the additional duties, USTR has granted exclusions from Section 301 duties to certain imports from China. None of those exclusions apply to the HTSUS numbers relevant to these investigations.

IEEPA. On January 20, 2025, President Trump declared a national emergency based on the threat of illegal immigration and illicit drugs.[15] On February 1, 2025, President Trump issued an Executive Order placing *ad valorem* duties on imports from China under the International Emergency Economic Powers Act ("IEEPA") to combat the fentanyl crisis.[16] On April 2, 2025, President Trump declared a national emergency based on the threat of structural imbalances in the global trading system and imposed reciprocal tariffs on several trading partners under IEEPA, including China, South Korea, Taiwan, and Vietnam.[17] These tariffs varied according to the trading partner and were modified based on agreements reached between the United States and certain countries.[18] On February 20, 2026, the Supreme Court issued a decision holding that President Trump lacked authority under IEEPA to impose the fentanyl and reciprocal tariffs.[19] On the same day, President Trump revoked all tariffs imposed pursuant to IEEPA.[20] These tariffs are no longer in effect.

Section 122. Simultaneous with the revocation of the IEEPA tariffs, President Trump proclaimed new additional duties at a rate of 10 percent pursuant to Section 122 of the Trade Act of 1974, as amended ("Section 122"), for a period from February 24, 2026 through July 24,

[15] *See Proclamation 10886 of January 20, 2025*, 90 Fed. Reg. 8327 (Exec. Off. Pres. Jan. 29, 2025) ("Declaring a National Emergency at the Southern Border").
[16] *See* Executive Order No. 14195 of February 1, 2025, *Imposing Duties To Address the Synthetic Opioid Supply Chain in the People's Republic of China*, 90 Fed. Reg. 9121 (Exec. Off. Pres. Feb. 7, 2025).
[17] *See* Executive Order No. 14257 of April 2, 2025, *Regulating Imports With a Reciprocal Tariff To Rectify Trade Practices That Contribute to Large and Persistent Annual United States Goods Trade Deficits*, 90 Fed. Reg. 15041 (Exec. Off. Pres. Apr. 7, 2025) (Reciprocal tariffs do not apply to Canada, Mexico, Russia, Belarus, Cuba, and North Korea).
[18] E.g., Executive Order 14326 of July 31, 2025, *Further Modifying the Reciprocal Tariff Rates*, 90 Fed. Reg. 37963 (Exec. Off. Pres Aug. 6, 2025) (applying different ad valorem rates for different trading partners).
[19] *See Learning Resources, Inc. v. Trump*, 607 U.S. ___ (2026).
[20] *See* Executive Order 14389 of February 20, 2026, *Ending Certain Tariff Actions*, 91 Fed. Reg. 9437 (Exec. Off. Pres. Feb. 25, 2026).

2026.[21] These Section 122 duties apply to imports of PTMEG from China, South Korea, Taiwan, and Vietnam.

C. Description Of The Subject Merchandise

Petitioner provides below a detailed description of the subject merchandise that is included within the scope of the investigation, including the technical characteristics and uses of the merchandise and its current U.S. tariff classification number.[22]

1. Technical characteristics and uses

PTMEG is also known as polytetrahydrofuran ("PolyTHF" or "PTHF"), polytetramethylene ether glycol, and polybutylene glycol. PTMEG is a high-performance polymer derived from tetrahydrofuran ("THF").[23] PTMEG is a waxy, white solid that melts into a clear, colorless, viscous liquid at room temperature.[24] PTMEG is an extremely useful material widely employed as a reactant in the production of urethanes, where it serves as the soft block in elastomeric formulations.[25] PTMEG provides both performance advantages and processing benefits across diverse industries due to its elasticity, hydrolysis resistance, and low-temperature flexibility.[26]

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[21] *See* Proclamation 11012 of February 20, 2026, *Imposing a Temporary Import Surcharge To Address Fundamental International Payments Problems*, 91 Fed. Reg. 9339 (Exec. Off. Pres. Feb. 25, 2026). Section 122 authorizes the President to impose a temporary import surcharge for a period not exceeding 150 days unless such period is extended by an Act of the Congress. *See* 19 U.S. Code § 2132(a)(3).
[22] 19 C.F.R. § 351.202(b)(5).
[23] *See* ChemAnalyst, *Polytetramethylene Ether Glycol (PTMEG)* at 1 ("*ChemAnalyst PTMEG Production Process*"), provided as **Exhibit I-3***;* [ ], provided as **Exhibit I-4**.
[24] *See* Korea PTG Co., Ltd., Technical Data Sheet, provided as **Exhibit I-5**; [ ], provided as **Exhibit I-1**.
[25] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3***; see also* [ ], provided as **Exhibit I-4**.
[26] *See* Gantrade, Petrochemical Blog, *PTMEG: Polytetramethylene Ether Glycol* at 1 ("*Gantrade, PTMEG*"), provided as **Exhibit I-6**; *see also* BASF, *PolyTHF – Polytetrahydrofuran* at 4 ("*BASF PolyTHF*"), provided as **Exhibit I-7**.

PTMEG is commercially produced in molecular weights ranging from 250 to 3,000, with grades of 1,000, 1,800, and 2,000 molecular weight dominating global consumption.[27] The molecular weight and molecular weight distribution are key features, as they directly impact the properties of the resulting polymer.[28] Its hydroxyl groups react with other functional groups such as organic acids or isocyanates.[29] PTMEG is normally associated with Chemical Abstracts Service ("CAS") registry number 25190-06-1.[30]

As a component in polymers, PTMEG offers numerous beneficial properties including good mechanical properties and excellent resiliency over a wide temperature range, low temperature flexibility, superior hydrolytic stability, superior resistance against microbes and fungus attack, high abrasion resistance, non-allergenic characteristics, superior dynamic properties with minimum heat build-up, high reactivity as a bi-functional primary alcohol, high tear strength, relatively low viscosities leading to easier processing and handling, and long shelf lives.[31]

Thermoplastic elastomers made with PTMEG can be processed into downstream products by means of injection molding, extrusion, and fiber spinning.[32] The main end uses of PTMEG are spandex fibers,[33] polyurethane elastomers, and copolyester-ether elastomers.[34]

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[27] *See* BASF, *Expand your success on elastomers: PolyTHF* at 5 ("*BASF elastomers*"), provided as **Exhibit I-8**; [ ], provided as **Exhibit I-1**.
[28] *See Gantrade, PTMEG* at 2, provided as **Exhibit I-6**; [ ], provided as **Exhibit I-4**.
[29] *See BASF elastomers* at 5, provided as **Exhibit I-8**.
[30] *See BASF elastomers* at 4, provided as **Exhibit I-8**.
[31] *See* BASF, *Expand your success on elastic fibers: PolyTHF* at 5 ("*BASF elastic fibers*"), provided as **Exhibit I-9**; [ ], provided as **Exhibit I-4**.
[32] *See BASF elastomers* at 5, provided as **Exhibit I-8**.
[33] [

], provided as **Exhibit I-4**
[34] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3***;* [ ], provided as **Exhibit I-1**.

Globally, [

].[35] In the United States, [

].[36] Additional details on the leading applications for PTMEG are provided below.

Polyurethane Fibers (Spandex)[37]: PTMEG is the primary raw material used in the production of spandex fibers, which are highly elastic fibers found in many textiles.[38] Spandex fibers are lightweight, long-lasting, smooth to the touch, readily dyeable, and resist humidity, environmental pollutants, and microbes across a wide temperature range.[39] Applications include denim, swimwear, sportswear, undergarments, hosiery, athletic wear, diapers, and home furnishings.[40] Spandex has also been used in medical devices, such as orthopedic braces used on hand, shoulder, leg, and ankle.[41]

Thermoplastic Polyurethane Elastomers ("TPU")*:* PTMEG is an important intermediate in manufacturing thermoplastic polyurethane elastomers.[42] TPUs are made by the reaction of an

[35] *See BASF elastomers* at 5, provided as **Exhibit I-8**.
[36] [ ], provided as **Exhibit I-1**.
[37] [ ], provided as **Exhibit I-4**.
[38] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3**; [ ], provided as **Exhibit I-4**.
[39] *See BASF elastic fibers* at 5, provided as **Exhibit I-9**; [ ], provided as **Exhibit I-4**.
[40] *See BASF elastic fibers* at 5, provided as **Exhibit I-9**; [ ], provided as **Exhibit I-4**; [ ], provided as **Exhibit I-1**.
[41] *See BASF elastic fibers* at 3, provided as **Exhibit I-9**; [ ], provided as **Exhibit I-4**.
[42] *See BASF elastomers* at 7, provided as **Exhibit I-8**; *see also BASF PolyTHF* at 1, provided as **Exhibit I-7**.

isocyanate and a polyol in a bulk or solution polymerization process that results in linear polymeric chains combined in block structures.[43] PTMEG-based TPUs exhibit superior resistance to hydrolysis, excellent flexibility at low temperatures, high resiliency and rebound properties, excellent mechanical and dynamic properties, outstanding abrasion resistance, and good processing characteristics.[44] Products made from PTMEG-based TPUs include automotive and aviation hoses and gaskets, forklift tires and wheels, roller skate wheels, industrial belts, tank and pipe liners, mining and oil production pump liners, athletic shoes, apparel such as leather coats, and medical prostheses and catheters.[45]

Coatings, Adhesives, and Sealants: When used in coating materials, PTMEG improves surface finishing, water-resistance, and microbe and abrasion resistance, making it ideal for waterborne or radiation-curable coatings for wooden or plastic surfaces, and for producing waterproof yet breathable fabrics and textiles.[46] PTMEG-containing polyurethane adhesives are suited for use in a wide range of downstream products, including one-component adhesives, two-component reaction adhesives, solvent-based adhesives, and hot melt adhesives for construction, footwear, automotive, packaging, lamination, and binder applications.[47]

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[43] *See Methylene Diphenyl Diisocyanate (MDI Products) from China*, Inv. No. 731-TA-1733 (Preliminary) (Preliminary), USITC Pub. 5606 (Apr. 2025) at 1.3 (adopted by *Methylene Diphenyl Diisocyanate (MDI Products) From China,* 90 Fed. Reg. 14868 (U.S. Int'l Trade Comm'n Apr. 4, 2025) ("MDI products are a diverse class of isocyanates derived from aniline. MDI is typically reacted with the hydroxyl groups of polyols to form polyurethane products.").

[44] *See Gantrade, PTMEG* at 2, provided as **Exhibit I-6**; [ ], provided as **Exhibit I-4**.

[45] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3**; [ ], provided as **Exhibit I-1**.

[46] *See BASF elastic fibers* at 2-3, provided as **Exhibit I-9**; [ ], provided as **Exhibit I-4**.

[47] *See BASF elastomers* at 6-7, provided as **Exhibit I-8**; [ ], provided as **Exhibit I-4**.

Copolyester-Ether Elastomers ("COPE")*:* COPE elastomers are high-performance engineering materials based on dimethyl terephthalate and PTMEG.[48] They are used in automotive components (including air bag deployment doors and vacuum brake tubes), as well as industrial products such as drive belts, gears, hose and tubing, seals, and pump diaphragms.[49]

2. Manufacturing process

PTMEG is manufactured by polymerizing THF with the use of an acid catalyst.[50] Many producers are vertically integrated, and their production process begins with the production of 1,4-butanediol ("BDO"),[51] which is then used to produce THF.[52] THF is then captively consumed to produce PTMEG via the polymerization of THF with the use of an acid catalyst.[53] Producers that are not integrated will purchase BDO or THF to produce PTMEG.

PTMEG can be produced by a variety of approaches, with direct catalysis in the presence of a strong acid being the initial commercial route.[54] Current commercial PTMEG production technology uses acetic anhydride and acetic acid as catalysts in the polymerization process.[55] Temperature, mixing, and reaction times are all closely monitored to keep by-products like

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[48] *See BASF elastomers* at 6-7, provided as **Exhibit I-8**; [ ], provided as **Exhibit I-4**.

[49] *See Gantrade, PTMEG* at 2, provided as **Exhibit I-6**; [ ], provided as **Exhibit I-4**.

[50] *See* [ ], provided as **Exhibit I-1**; Acid catalysts commonly used in the process are fluorosulfonic acid (FSA) catalyst (HSO_3F) and acetic anhydride (Ac_2O). *See id.*; *see also* Mitsubishi Chemical Group, PTMEG Technology at 2 ("*Mitsubishi PTMEG Technology*"), provided as **Exhibit I-10**.

[51] BDO is produced by a variety of methods, mainly from petrochemicals. [

]

[52] *See* [ ], provided as **Exhibit I-11**.

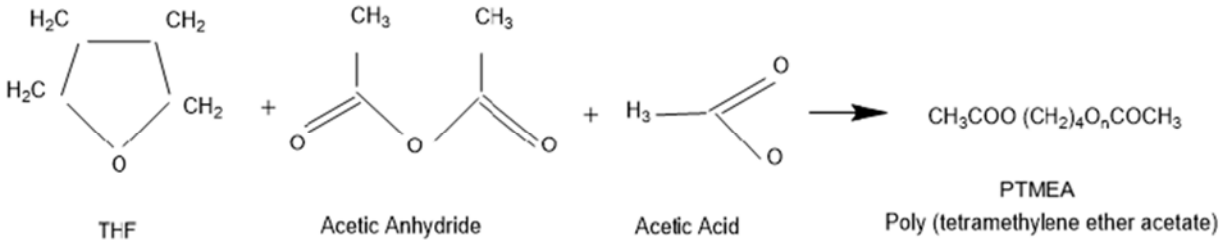
[53] *See* [ ], provided as **Exhibit I-1**.

[54] *See ChemAnalyst PTMEG Production Process* at 2, provided as **Exhibit I-3**; [ ], provided as **Exhibit I-4**.

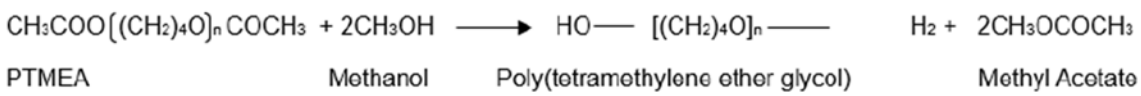
[55] [ ], provided as **Exhibit I-4**. Fluorosulfonic acid can also be used as a catalyst in the production of PTMEG. *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3**.

cyclic oligomers low.[56] Additives are sometimes used to fine-tune molecular weight and hydroxyl value.[57] The chemical reactions involved in the process are summarized below:

Polymerization reaction: THF is polymerized with the use of acetic acid and acetic anhydride to create poly(tetramethylene ether acetate) ("PTMEA").[58]



Methanolysis reaction: The PTMEA is then reacted with methanol in a reactive transesterification step to yield PTMEG and methyl acetate in the presence of a basic catalyst.[59]



Catalyst recovery: The catalyst can be recovered from the polymerization step and recycled through hydrocarbon extraction, distillation, alumina adsorption, and molecular distillation.[60]

Molecular weight narrowing: The crude PTMEG has too broad a molecular weight distribution to be useful in polymeric applications, so it undergoes a "finishing" or "narrowing"

[56] *See ChemAnalyst PTMEG Production Process* at 2, provided as **Exhibit I-3**.
[57] *See ChemAnalyst PTMEG Production Process* at 2, provided as **Exhibit I-3**.
[58] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3**; [ ], provided as **Exhibit I-4**.
[59] [ ], provided as **Exhibit I-4**; *see also Mitsubishi PTMEG Technology*, provided as **Exhibit I-10**.
[60] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3**; [ ], provided as **Exhibit I-4**.

step.[61] The current preferred commercial approach uses distillation chambers to separate PTMEG with different molecular weights.[62]

Packaging: PTMEG is typically blended with butylated hydroxytoluene ("BHT") or another stabilizer.[63] PTMEG is available in steel drums, and ISO tanks, tank trucks, and railroad tank cars.[64]

3. U.S. tariff classification numbers

The subject merchandise is classifiable in the HTSUS under subheading 3907.29.00.[65] The HTSUS General Duty rate is 6.5 percent.[66] This HTSUS code also includes out-of-scope products. Importers may also use other HTSUS subheadings to import PTMEG, including HTSUS subheading 2932.11.00. As discussed in the next section, the coverage of these petitions is determined by the written description of the scope of the investigations, not the HTSUS numbers.

4. Requested scope of the investigations

Petitioner proposes that the following scope for the imported merchandise that covered by these investigations:

> The merchandise covered by this investigation is polytetramethylene ether glycol ("PTMEG"), which is a polymer consisting of linear diols (i.e., organic chemical compound that has two hydroxyl (-OH) functional groups) with a molecular backbone

[61] *See ChemAnalyst PTMEG Production Process* at 1, provided as **Exhibit I-3**; [ ], provided as **Exhibit I-4**.
[62] [ ], provided as **Exhibit I-4**; *see also Mitsubishi PTMEG Technology* at 2 ("Oligomer separation"), provided as **Exhibit I-10**.
[63] [ ], provided as **Exhibit I-4**.
[64] [ ], provided as **Exhibit I-4**; BASF *PolyTHF* at 4, provided as **Exhibit I-7**.
[65] Chapter 39 of the HTSUS covers "Plastics and Articles Thereof; Rubber and Articles Thereof," and HTSUS subheading 3907.29.00 covers "Polyacetals, other polyethers and epoxide resins, in primary forms; polycarbonates, alkyd resins, polyallyl esters and other polyesters, in primary forms: Other polyethers: Other." *See* Chapter 39 of the HTSUS at 39-9, provided as **Exhibit I-12**.
[66] *See* HTSUS Chapter 39, provided as **Exhibit I-12**.

of repeating tetramethylene units ($-CH_2CH_2CH_2CH_2-$) interconnected through ether bonds (i.e., a single oxygen atom bonded to two carbon atoms), with a chemical formula $HO\{(CH_2)_4\}_nOH$. PTMEG is also referred to as Polytetrahydrofuran, PTHF, Polytetramethylene ether glycol, PTMG, and Polybutylene glycol. PTMEG is typically blended with butylated hydroxytoluene ("BHT") or another stabilizer. PTMEG is normally associated with Chemical Abstracts Service ("CAS") registry number 25190-06-1.

The scope includes all forms of PTMEG, regardless of physical form, purity, molecular weight, number of hydroxyls, number of acids, color, density, softening point, glass transition point, flash point, water content, viscosity, and packaging. PTMEG that has been blended with other products is included within this scope when such blends include constituent parts that have been intermingled but that have not been chemically reacted with each other to produce a different product. For such blends, only the PTMEG component of the mixture is covered by the scope of these investigations.

The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing, or removing stabilizers, modifiers, or additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the subject country. The scope also includes PTMEG that is commingled or blended with PTMEG from sources not subject to these investigations. Only the subject component of such commingled products is covered by the scope of these investigations.

The subject merchandise is classifiable in the Harmonized Tariff Schedule of the United States ("HTSUS") under subheading 3907.29.00. Subject merchandise may also be imported under HTSUS subheading 2932.11.00. Although the HTSUS subheading and CAS registry number are provided for convenience and customs purposes, the written description of the scope is dispositive.

D. Class Or Kind Of Merchandise And Domestic Like Product[67]

PTMEG constitutes a single class or kind of merchandise. As explained in **Section III** below, there is a single domestic like product in these investigations, which includes all PTMEG, as that product is described in the scope. Thus, pursuant to 19 U.S.C. § 1677(10), domestic PTMEG is the product that is "like, or in the absence of like, most similar in characteristics and uses with the article subject to investigation."

E. Countries Of Exportation[68]

The countries in which the subject merchandise is manufactured or produced are China, South Korea, Taiwan, and Vietnam. Data regarding U.S. imports from these countries are included in **Exhibit I-13**.[69]

F. Producers, Exporters,[70] Importers,[71] And Purchasers[72] Of The Subject Merchandise

The name, address, and contact information for BASF, the petitioner and only domestic producer of PTMEG, is shown above in **Section II.A.** The names, addresses and contact information of producers and exporters of PTMEG in the subject countries are listed in **Exhibit I-14**. Information that would enable the Petitioner to estimate the percentage of exports accounted for by each individual exporter is not reasonably available.

The names, addresses, and contact information of the companies that the Petitioner believes may have imported the subject merchandise into the United States during the most

[67] 19 C.F.R. § 207.11(b)(2)(iv).
[68] *See* 19 C.F.R. § 351.202(b)(6).
[69] Petitioner provides import data based on U.S. Census as **Exhibit I-13a** and import data based on the industry report [ ] as **Exhibit I-13b**.
[70] *See* 19 C.F.R. § 351.202(b)(7)(i)(A-B) and 19 C.F.R. § 351.202(b)(7)(ii)(A-B).
[71] *See* 19 C.F.R. § 207.11(b)(2)(iii); 19 C.F.R. § 351.202(b)(9).
[72] *See* 19 C.F.R. § 207.11(b)(2)(v).

recent twelve-month period preceding the filing of the petition are listed in **Exhibit I-15**. A list of purchasers of the subject imports is provided in **Exhibit I-16**.

Contact information for all parties was obtained by Petitioner from its own market knowledge and from research on the Internet and from other sources. The exhibits referenced above reflect all information that is reasonably available to Petitioner at this time.

G. Volume And Value Of Subject Merchandise

An analysis of the volume and value of subject merchandise imported into the United States during the period from 2023 to 2025 is presented below in **Section IV.C**.

III. THE DOMESTIC LIKE PRODUCT AND THE DOMESTIC INDUSTRY

A. The Domestic Like Product Consists of All PTMEG Covered By The Scope

The domestic like product is defined as the product that is "like, or in the absence of like, most similar in characteristics and uses with the article subject to investigation."[73] Under the Commission's traditional like product factors, the available evidence establishes that all PTMEG covered by the scope constitute a single like product. The analysis below confirms that the domestic like product should be coextensive with the scope of the investigations. We discuss this issue below.

1. The legal standard

Under the statute, the Commission's analysis of the domestic like product begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by Commerce.[74] Therefore, the scope of the imported merchandise is the starting point for the Commission's

[73] 19 U.S.C. § 1677(10).
[74] *See Thermal Paper from Germany, Japan, Korea, and Spain*, Inv. Nos. 731-TA-1546-1549 (Final), USITC Pub. 5237 (Nov. 2021) at 4 ("*Thermal Paper*") (adopted by *Thermal Paper From Germany, Japan, Korea, and Spain,* 86 Fed. Reg. 64958 (U.S. Int'l Trade Comm'n Nov. 19, 2021).

analysis.[75] The Commission then defines the domestic like product in light of the imported articles covered by the scope.

The decision regarding the appropriate domestic like product is a factual determination, and the Commission has applied the statutory standard of "like" on a case-by-case basis.[76] When making its domestic like product determination, the Commission typically considers several factors, including the following: (1) the physical characteristics and uses of the products; (2) their interchangeability; (3) their channels of distribution; (4) customer and producer perceptions of the products; (5) whether they are produced using similar manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price.[77] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[78] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[79]

2. The domestic like product

a. Physical characteristics and end uses

All forms of PTMEG share the same physical characteristics and end uses.[80] In this regard, all forms of PTMEG have a similar chemical composition, because they have the same chemical formula (i.e., $HO\{(CH_2)_4\}_nOH$), with only the number of tetramethylene units

[75] *Thermal Paper* at 4.
[76] *Thermal Paper* at 5.
[77] *See Nippon Steel Corp. v. United States*, 19 C.I.T. 450, 455 (1995); *see also Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).
[78] *Thermal Paper* at 5.
[79] *Thermal Paper* at 5.
[80] *See e.g., Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand,* Investigation Nos. 701-TA-581 and 731-TA-1374-1376 (Preliminary), USITC Pub. 4710 (July 2017) at 7-10, adopted by *Citric Acid and Certain Citrate Salts From Belgium, Colombia, and Thailand*, 82 Fed. Reg. 33925 (U.S. Int'l Trade Comm'n July 21, 2017).

varying.[81] PTMEG comes in different molecular weights, depending on the number of tetramethylene units.[82] There is no significant distinction between various forms of PTMEG, and all grades of PTMEG are associated with a single CAS number.[83] PTMEG consists of a waxy, white solid that melts into a clear, colorless, viscous liquid at room temperature.[84]

All forms of PTMEG are used in the same range of end uses. In particular, PTMEG is used in the production of spandex, thermoplastic polyurethane elastomers, coatings, adhesives, cast products, and certain industrial applications. Given these facts, this factor supports a finding that all PTMEG are part of the same domestic like product.

b. Interchangeability

Because all forms of PTMEG are used for the same purposes in the same range of end uses, all forms of PTMEG are broadly interchangeable.[85] Depending on the specific application, a user might purchase PTMEG with a specific functionality, reactivity, viscosity, flexibility, or mold flowability. Nonetheless, these preferences do not create a clear distinction between any of the forms of PTMEG that are covered by the scope. Thus, this factor supports treating all PTMEG as part of the same domestic like product.

[81] *See e.g.*, Korea PTG Co., Ltd., Technical Data Sheet, provided as **Exhibit I-5**; *BASF elastomers* at 4, provided as **Exhibit I-8**.
[82] *See e.g.*, *BASF elastomers* at 10, provided as **Exhibit I-8**. The most common commercial grades are 250, 650, 1000, 1400, 1800, 2000, and 3000. *Id*.
[83] *See e.g.*, *BASF elastomers* at 4, provided as **Exhibit I-8**; Gantrade*, Products, Polytetramethylene Ether Glycol*, provided as **Exhibit I-17**.
[84] [ ], provided as **Exhibit I-1**; Gantrade, PTMEG at 1, provided as **Exhibit I-6**.
[85] *See Gantrade*, *PTMEG* at 2, provided as **Exhibit I-6** (showing that polyurethane resins can be produced using any of the available grades and that at least two grades – PTMEG 1000 and PTMEG 2000 – can be used in industries, including for fiber and non-fiber applications).

c. Channels of distribution

The channels of distribution are the same for all forms of PTMEG. As a general matter, both BASF and importers market PTMEG to end users and distributors.[86] Accordingly, this factor also supports treating PTMEG as a single domestic like product.

d. Producer and customer perceptions

Both customers and producers generally recognize that the PTMEG covered by these petitions is a single like product. All of BASF's PTMEG is marketed under the same registered trademark, PolyTHF.[87] Other market participants in the United States also market all PTMEG as a single product category.[88] Finally, industry reports are often dedicated exclusively to PTMEG.[89] Thus, this factor supports treating all PTMEG as part of the same domestic like product.

e. Common manufacturing facilities, production processes, and production employees

All forms of PTMEG are made in the manufacturing facilities, using the same general process and the same employees. The manufacturing process is described in **Section II.C.2** above. As discussed above, PTMEG is generally made through the polymerization of THF in the presence of a catalyst. This factor also supports treating all PTMEG as part of the same domestic like product.

f. Price

As described above, all forms of PTMEG share similar physical and chemical characteristics, are produced in the same facilities by the same workers, and are generally used

[86] *See* List of U.S. Importers, provided as **Exhibit I-15** (listing distributors and end users); *see also* Petitioner's Trade and Financial Data, provided as **Exhibit I-21** (showing the shipment volume per channel of distribution).
[87] *See BASF PolyTHF* provided as **Exhibit I-7**.
[88] *See e.g.*, Gantrade, *Products, Polytetramethylene Ether Glycol*, provided as **Exhibit I-17**.
[89] *See e.g.*, [ ], provided as **Exhibit I-1**.

for the same purposes. As a result, prices for all types of PTMEG tend to be influenced by the same factors and typically move together in response to changes in supply and demand. Once again, therefore, this factor – like the other factors normally considered by the Commission – supports treating all PTMEG as part of the same domestic like product.

g. Conclusion

As shown above, a review of the Commission's traditional domestic like product factors demonstrates that all forms of PTMEG that are covered by the scope constitute a single domestic like product. Therefore, the Commission should find that all forms of PTMEG that are covered by the scope constitute a single domestic like product.

B. The Domestic Industry Consists Of BASF, The Only U.S. Producer Of The Domestic Like Product

The Act defines the term "industry" as "the producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of total domestic production of the product."[90] As we previously noted, Petitioner is the only producer of PTMEG in the United States.[91] Accordingly, BASF accounted for all domestic production of PTMEG in the United States during the entire period of investigation.[92] Thus, the domestic industry consists of BASF's PTMEG operations in the United States.

[90] 19 U.S.C. § 1677(4)(A).
[91] *See* [ ]; *see also* The LYCRA Company Sep. 2022 Quarterly Report at 4, provided as **Exhibit I-18**. Until 2020, the LYCRA Company also produced PTMEG. LYCRA closed its PTMEG manufacturing facility in La Porte, Texas, in 2020, leaving BASF as the only producer of PTMEG in the United States
[92] *See* Domestic Industry Support, provided as **Exhibit I-2**.

IV. THE DOMESTIC INDUSTRY IS BEING MATERIALLY INJURED BY REASON OF SUBJECT IMPORTS[93]

A. The Subject Imports Are Not Negligible

Pursuant to Section 771(24)(A)(i) of the Act, if the Commission finds that imports of the subject merchandise from a particular country are "negligible," the investigation into those imports must be terminated.[94] Under the Act, imports are not considered "negligible" if they account for less than three percent of the volume of all such merchandise imported into the United States in the most recent twelve-month period for which data are available that precedes the filing of the petition.[95] The Act further provides that, in the context of a threat of injury determination, the Commission shall not treat imports as negligible if it determines that there is a potential that subject imports will imminently exceed the relevant negligibility threshold.[96]

In addition, under Section 771(24)(A)(ii) of the Act, imports that would otherwise be negligible under clause (i) because they fall below the three percent negligibility threshold shall not be negligible if the aggregate volume of such imports from all countries exceeds seven percent of the volume of all such merchandise imported into the United States during the applicable twelve-month period. When analyzing negligibility, the Commission may make reasonable estimates on the basis of available statistics.[97]

Information on subject imports for the most recent twelve-month period for which Census data are available is contained in **Exhibit I-19**.[98] These data demonstrate that imports from China, South Korea, Taiwan, and Vietnam under the HTSUS subheading covering PTMEG

[93] *See* 19 C.F.R. § 351.202(b)(10).
[94] *See* 19 U.S.C. § 1673b(a)(1).
[95] *See* 19 U.S.C. § 1677(24)(A)(i).
[96] *See* 19 U.S.C. § 1677(24)(A)(iv).
[97] 19 U.S.C. § 1677(24)(C).
[98] *See* Import Data for 12 Months, provided as **Exhibit I-19a** (The most recent twelve-month period for which Census data are available consists of the period from March 2025 through February 2026).

each accounted for more than three percent of total imports over the period. In this regard, the available evidence establishes that the subject imports from China, South Korea, Taiwan, and Vietnam accounted for approximately 12.0, 45.7, 6.5, and 3.7 percent, respectively, of the volume of all imports during this period. Thus, imports from these four countries are not negligible.[99]

Because the HTSUS subheading covering PTMEG is a basket category that includes imports of items other than PTMEG, Petitioner has analyzed import data for PTMEG in the [ ] and is the most current industry report on PTMEG. The [ ] contains data for full year 2025 and, therefore, represents the most recent twelve-month period for which import data specific to PTMEG are available at the time the petition is filed.

According to this report, the subject imports from China, South Korea, Taiwan, and Vietnam accounted for approximately [ ] percent, respectively, of the volume of all imports during this period.[100] Thus, these data confirm that the subject imports from each of these four countries accounted for at least three percent of total imports during the most recent period for which data are reasonably available.

In sum, the available evidence establishes that imports of PTMEG from China, South Korea, Taiwan, and Vietnam are above the negligibility threshold during the twelve-month period for which data are available as of the petition's filing date.[101] Thus, the available evidence shows that the subject imports from China, South Korea, Taiwan, and Vietnam are not negligible.

[99] *See* Import Data for 12 Months, provided as **Exhibit I-19a**.
[100] *See* Import Data for 12 Months, provided as **Exhibit I-19b**.
[101] *See* Import Data for 12 Months, provided as **Exhibit I-19a**.

B. The Subject Imports Should Be Cumulated For Purposes Of The Commission's Material Injury Analysis

The Act provides for the cumulative analysis of subject imports from more than one country, subject to certain conditions and exceptions. When deciding whether subject imports materially injure a domestic industry, the Commission must cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which petitions were filed on the same day, if such imports compete with each other and with the domestic like product in the U.S. market.[102] In assessing whether imports compete with each other and with the domestic like product, the Commission generally has considered the following four factors:

- The degree of ***fungibility*** between the imports from different countries and between imports and the domestic like product;
- The presence of sales or offers to sell in the ***same geographic markets*** of imports from different countries and the domestic like product;
- The existence of ***common or similar channels of distribution*** for imports from different countries and the domestic like product; and
- Whether the imports are ***simultaneously present*** in the market.[103]

Although no single factor is necessarily determinative, and the list of factors is not exclusive, these factors provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.[104] When assessing whether

[102] 19 U.S.C. § 1677(7)(G).
[103] *See Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd, Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).
[104] *Granular Polytetrafluoroethylene (PTFE) Resin from India and Russia*, Inv. Nos. 701-TA-663-664 & 731-TA-1555-1556 (Final), USITC Pub. 5285 (March 2022) at 16-17 (adopted by *Granular Polytetrafluoroethylene (PTFE) Resin From India and Russia; Determinations*, 87 Fed. Reg. 14038 (U.S. Int'l Trade Comm'n Mar. 11, 2022)).

to cumulate subject imports from multiple countries, the Commission looks only for a reasonable overlap of competition.[105]

In these investigations, the statutory criteria for cumulation are met. First, the petitions covering imports of PTMEG from China, South Korea, Taiwan, and Vietnam are being filed on the same day. Second, as we discuss below, there is a reasonable overlap in competition among imports from the subject countries and the domestic like product. Thus, the subject imports from China, South Korea, Taiwan, and Vietnam compete with one another and with the domestic like product and should be cumulated for purposes of the Commission's material injury analysis. We discuss each of the cumulation factors below.

Fungibility. The subject and domestic PTMEG share the same physical characteristics and specifications. PTMEG is a commodity product, and the physical characteristics of the types of PTMEG sold in the U.S. market are the same, whether they are produced by the domestic industry or imported from subject countries. In other words, regardless of where it is produced, all forms of PTMEG have the same chemical composition and meet the same industry requirements. Moreover, there is no significant physical or end use difference between domestic and subject PTMEG. In other words, there is a reasonable degree of fungibility between the subject imports from each source and the domestic like product.

Channels of Distribution. The subject imports from China, South Korea, Taiwan, and Vietnam and the domestic like product are sold in significant volumes directly to end users and distributors. Thus, imported PTMEG from the subject countries and the domestic like product are being sold in the same channels of trade in the U.S. market.

[105] *Granular Polytetrafluoroethylene (PTFE) Resin from India and Russia*, Inv. Nos. 701-TA-663-664 & 731-TA-1555-1556 (Final), USITC Pub. 5285 (March 2022) at 16-17 (adopted by *Granular Polytetrafluoroethylene (PTFE) Resin From India and Russia; Determinations*, 87 Fed. Reg. 14038 (U.S. Int'l Trade Comm'n Mar. 11, 2022)).

Geographic Markets. Imports of PTMEG from China, South Korea, Taiwan, and Vietnam and the domestic like product are sold in the same geographic regions in the United States. In this regard, the [

][106] [ ] the available data indicate that the subject imports from China, South Korea, Taiwan, and Vietnam are generally sold throughout the United States.[107] Consequently, there is a reasonable geographic overlap among the subject imports and the domestic like product.

Simultaneous Presence. During the period from 2023 to 2025, Petitioner sold substantial volumes of PTMEG in the U.S. market.[108] Similarly, during each year of this period, PTMEG imports from China, South Korea, Taiwan, and Vietnam were sold in significant volumes in the U.S. market.[109] As a result, the subject imports and the domestic like product were simultaneously present in the U.S. market throughout the period of investigation.

Conclusion. The reasonably available evidence demonstrates that there is a reasonable overlap of competition between imports from each of the subject countries and the domestic like product. The domestic like product and the subject imports are reasonably fungible, they are sold in the same channels of distribution and the [ ] geographic regions, and they have been simultaneously present in the United States from 2023 onwards. Accordingly, the Commission should cumulate the subject imports from China, South Korea, Taiwan, and Vietnam.

C. Subject Imports Have Caused Material Injury To The Domestic Industry

In antidumping duty investigations, the Commission must determine whether an industry in the United States is materially injured, or threatened with material injury, by reason of imports

[106] List of Purchasers, provided as **Exhibit I-16**.
[107] *See* Geographic Distribution of the Subject Imports, provided as **Exhibit I-20**.
[108] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[109] *See* Import Data, provided as **Exhibit I-13**.

of subject merchandise.[110] The Act defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[111] When analyzing the causal link between unfair trade and material injury, the Commission has recognized that "{i}n many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry."[112] Nonetheless, the Commission "need not isolate the injury caused by other factors from injury caused by unfairly traded imports."[113] Furthermore, the law does not "require that unfairly traded imports be the 'principal' cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry."[114]

When assessing whether the domestic industry has been materially injured by reason of imports of subject merchandise, the Commission considers: (1) the volume of imports of the subject merchandise, (2) the effect of imports of subject merchandise on prices in the United States for domestic like products, and (3) the impact of imports of such merchandise on producers of the domestic like product in the context of production operations within the United States.[115] As shown below, the facts related to each of these statutory factors show that subject imports have caused material injury to the domestic industry.

[110] *See* 19 U.S.C. § 1673d(b)(1).
[111] 19 U.S.C. § 1677(7)(A).
[112] *See Sodium Nitrate from Russia*, Inv. No. 701-TA-680 (Final), USITC Pub. 5342 (Aug. 2022) ("*Sodium Nitrate from Russia*") at 18 (adopted by *Sodium Nitrite From Russia*, 87 Fed. Reg. 51141 (U.S. Int'l Trade Comm'n Aug. 19, 2022)).
[113] *Sodium Nitrate from Russia* at 19.
[114] *Sodium Nitrate from Russia* at 19-20.
[115] 19 U.S.C. § 1677(7)(B)(i). The Commission may also consider "such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports." 19 U.S.C. § 1677(7)(B)(ii).

1. Conditions of competition in the PTMEG market make the domestic industry susceptible to injury

In examining the impact of subject imports, the Commission is directed to evaluate all relevant economic factors specified in the statute "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[116] Here, conditions of competition in the market for PTMEG make the domestic industry highly susceptible to the adverse impact of aggressive price competition from subject imports.

a. Demand Trends

In the United States, demand for PTMEG in the United States is driven primarily by [ ] applications, which are projected to increase at a rate of [ ] percent rate annually[117] and by demand for [ ], which is expected to grow at a [ ] percent rate annually until 2030.[118] As a result, demand for PTMEG in the United States is expected to increase by [ ] percent annually until 2030.[119] Based on reasonably available data, demand for PTMEG has increased by [ ] percent between 2023 and 2025,[120] which is a trend that provides a strong incentive for the subject imports to continue attacking the U.S. market with unfairly traded pricing levels.

b. Subject imports are highly interchangeable with the domestic like product

As we described above, domestic and imported PTMEG share the same basic characteristics and uses and are highly interchangeable. PTMEG is a commodity product, and all PTMEG, whether produced by the domestic producer or the subject producers, has the same

[116] 19 U.S.C. § 1677(7)(C)(iii).
[117] *See* [ ], provided as **Exhibit I-1**.
[118] *See* [ ], provided as **Exhibit I-1**.
[119] *See* [ ], provided as **Exhibit I-1**.
[120] Apparent Domestic Consumption and U.S. Market Shares, provided as **Exhibit I-22**.

chemical composition and meets the same industry requirements. As a result, the subject imports of PTMEG are highly interchangeable with the domestic like product.

c. Price is a critical factor in the purchase decision for PTMEG

Because there is a high degree of substitutability between the domestic like product and subject imports, price is a critical factor in purchase decisions in the U.S. market. As a result, subject imports' very low prices in the U.S. market have a significant adverse impact on BASF's ability to obtain sales volumes and prices at sustainable levels.

d. The production process for PTMEG is capital-intensive

The production process for PTMEG is a technically sophisticated, capital-intensive process involving a high level of fixed costs. As a result, BASF and subject foreign producers have strong incentives to operate at high capacity utilization rates to lower their unit costs and maintain their operating margins at a reasonable level. Importantly, the capital intensity of PTMEG production drives subject producers to ship significant additional volumes of PTMEG to the United States. It also means that lost sales and market share have very significant adverse effects on the domestic producer's per-unit fixed costs and profitability.

2. The volume of the subject imports is significant

a. Import volumes from the subject countries

Under Commerce's regulations, a petition should contain the "volume and value of the subject merchandise imported during the most recent two-year period and any other recent period that the petitioner believes to be more representative."[121] For its part, when analyzing import volume trends, the Commission routinely examines import data for the subject imports

[121] 19 C.F.R. § 351.202(b)(8).

for the three most recent full years and for the most recently completed quarter for the year in which the petition is filed.

In this case, there are two sources of reasonably available information for subject imports of PTMEG into the United States, Census data and the data for PTMEG imports contained in the [ ]. As previously noted, the HTSUS subheading covering imports of PTMEG – *i.e.*, 3907.29.00, HTSUS – is a basket category that also covers products outside the proposed scope. The Census data for imports under 3907.29.00, HTSUS, for the four subject countries during 2023-2025 period are as follows:[122]

Quantity (short tons)

	2023	2024	2025
South Korea	53,774	78,378	90,660
China	38,856	43,871	29,743
Taiwan	9,232	9,341	12,825
Vietnam	3,520	6,039	7,807
Subject countries	**105,381**	**137,629**	**141,035**

C.I.F. Value (1,000 $)

	2023	2024	2025
South Korea	119,393	162,088	177,345
China	61,931	68,039	40,422
Taiwan	23,529	20,722	23,594
Vietnam	8,214	12,610	14,473
Subject countries	**213,066**	**263,459**	**255,834**

Source: Import Data, **Exhibit I-13a**.

[122] *See* Import Data, as provided as **Exhibit I-13a**.

Below are the data for PTMEG imports in the [ ], which is the most recently available report covering PTMEG imports specifically.[123]

	Quantity (short tons)		
	2023	**2024**	**2025**
South Korea	[		]
China	[		]
Taiwan	[		]
Vietnam	[		]
Subject countries	**[**		**]**

Source: Import Data, **Exhibit I-13b**.

Petitioner believes the [ ] represents the best publicly available data relating to the volume of the subject imports of PTMEG into the United States. However, [ ] Thus, for purposes of 19 C.F.R. § 351.202(b)(8), which seeks data regarding volume and value, we have provided the Census data above as the best information currently available to the Petitioner for the values of the subject imports.

b. The volume of the subject imports is significant, both in absolute and relative terms

The Act provides that "{i}n evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[124] As shown in more detail below, the evidence available to Petitioner indicates that the volume of the subject imports is significant, both in absolute terms and relative to U.S. apparent consumption and domestic production.

[123] Petitioner converted the figures from thousand metric tons to short tons using the figures contained in the accompanying [ ]. *See* [ ], provided as **Exhibit I-1**; *see also* Import Data, as provided as **Exhibit I-13b**.
[124] 19 U.S.C. § 1677(7)(C)(i).

As explained above, we believe that the best publicly available data for the volume of the subject imports of PTMEG from China, South Korea, Taiwan, and Vietnam for the most recent three years is the data for these imports reported in the [ ]. When combined with the U.S. shipment data of the Petitioner, which is the lone domestic producer of PTMEG, the data demonstrate the following:

- The volume of the subject imports from China, South Korea, Taiwan, and Vietnam increased significantly between 2023 and 2025, increasing from [ ] short tons in 2023 to [ ] short tons in 2025. This represents an increase in subject volumes of [ ] percent.[125]

- The market share of the subject imports in the United States also increased significantly during the same period, growing from [ ] percent in 2023 to [ ] percent in 2025, for an increase of [ ] percentage points.[126]

- The domestic industry's share of the market dropped significantly between 2023 and 2025, falling from [ ] percent in 2023 to [ ] percent in 2025, for an overall decline of [ ] percentage points.[127]

- Moreover, the ratio of the subject imports to domestic production also grew between 2023 and 2025, increasing from [ ] percent in 2023 to [ ] percent in 2025.[128]

Given these trends, the reasonably available evidence shows that, between 2023 and 2025, the volumes of the subject imports was significant and grew significantly, in absolute terms and relative to U.S. apparent consumption and domestic production. Moreover, the available evidence indicates that the growth in the volume of the subject imports has significantly and adversely affected the sales and market share of the domestic industry since 2023.

[125] *See* Import Data, as provided as **Exhibit I-13b**.
[126] Apparent Domestic Consumption and U.S. Market Shares, provided as **Exhibit I-22**.
[127] Apparent Domestic Consumption and U.S. Market Shares, provided as **Exhibit I-22**.
[128] Ratio of subject imports to domestic production, provided as **Exhibit I-23**.

3. The price effects of the subject imports are significant

In evaluating the effects of subject imports on prices, the Commission shall consider whether: (1) there has been significant underselling by the imported merchandise as compared with the price of the domestic like product, and (2) the effect of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[129] As shown below, the available evidence shows that the subject imports have consistently undersold the domestic like product since 2023, and the subject imports have also significantly depressed and suppressed domestic prices. Accordingly, the available evidence shows that the subject imports have had a significant adverse impact on domestic prices.

a. The subject imports have undersold the domestic like product significantly

The available evidence indicates that subject imports undersold the domestic industry significantly between 2023 and 2025. Two methodologies comparing the average unit values ("AUVs") of the domestic producer's U.S. commercial shipments to the AUVs of subject imports confirm this pattern.

First, Petitioner compares the domestic producer's U.S. commercial shipments to the AUVs of subject imports from Census data for the HTSUS number covering PTMEG imports:[130]

AUV Comparison ($/short ton) – U.S. Census Data			
	2023	**2024**	**2025**
Petitioner's U.S. commercial shipments (A)	[ ]	[ ]	[ ]
Cumulated subject imports (B)	2,022	1,914	1,814
Difference between domestic and subject import AUVs (C) (C = A – B)	[ ]	[ ]	[ ]

[129] 19 U.S.C. § 1677(7)(C)(ii).
[130] Underselling Comparisons, provided as **Exhibit I-24a**. The average unit value of the subject imports is derived from the available Census data for the HTSUS number covering PTMEG imports.

Source: Petitioner's Trade Data; Import Data

Based on this data, the average unit value of the subject imports has been [ ] lower than the average unit value of the domestic industry's commercial U.S. shipments between 2023 and 2025. Moreover, as can also be seen from the table, the AUVs for the subject countries fell dramatically during the same period.[131] Because subject imports and the domestic like product are highly substitutable, and given that price is a critical factor in purchasing decisions of PTMEG, the very low prices being offered by the subject imports have had a severe depressing effect on domestic prices, which fell from [ ] per short ton in 2023 to [ ] per short ton in 2025, for an overall decline of [ ] percent.[132] Importantly, even though BASF [ ] with the low prices being offered by the subject imports, the domestic producer still lost a large amount of market share to the subject imports during the period. BASF's market share fell by approximately [ ] percentage points between 2023 and 2025 while subject imports' market share increased by [ ] percentage points over the same period.[133]

Second, recognizing that Census figures rely on basket categories, and therefore, they include imports of items other than PTMEG, Petitioner compares domestic AUVs to subject import AUVs specifically for PTMEG producer's U.S. commercial shipments to the AUVs of the subject imports compiled by industry report providers. In the table below, we provide a

[131] *See* Import Data, provided as **Exhibit I-13a**.
[132] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[133] Apparent Domestic Consumption and U.S. Market Shares, provided as **Exhibit I-22**. Petitioner relies on the market share based on the volume of imported PTMEG as reported in the [ ].

comparison of the AUVs of the domestic producer's U.S. commercial shipments to the AUVs of the subject imports during that period from the [ ]:[134]

AUV Comparison ($/short ton) – Market Report			
	2023	2024	2025
Petitioner's U.S. commercial shipments (A)	[ ]	[ ]	[ ]
Cumulated subject imports (B)	[ ]	[ ]	[ ]
Difference between domestic and subject import AUVs (C) (C = A – B)	[ ]	[ ]	[ ]

Source: Petitioner's Trade Data; [ ].

These data also show underselling: subject import AUVs remained [ ] lower than domestic AUVs, and the gap widened over time. Subject import prices fell sharply from [ ] per short ton in 2023 to [ ] in 2024, for a [ ] percent[135] decrease, then declined further to [ ] in 2025, for an additional [ ] percent decrease.[136]

Moreover, the information that Petitioner is providing regarding lost sales and lost revenues further demonstrates that the subject imports have been underselling and otherwise harming prices for the domestic like product. For example, the lost sales and revenues information provided in **Exhibit I-25** shows that:

- [

]

]

- [

[134] Underselling Comparisons, provided as **Exhibit I-24b**. The [ ]

[135] *See* Import Data, provided as **Exhibit I-13a**.

[136] *See* Import Data, provided as **Exhibit I-13a**.

[137] *See* Lost Sales Lost Revenues Chart, provided as **Exhibit I-25**.

]138

Importantly, these are just some examples of the aggressively low pricing offers from the subject importers that the Petitioner has been facing in the market. There can be no doubt that the subject producers and importers have been using extremely low prices to take sales and market share from the domestic industry in the past three years.

In order to perform its price comparisons in its preliminary phase investigations, Petitioner requests that the Commission collect data for the following four representative products:

- **Product 1**.-- PTMEG, grade 1000, molecular weight 950-1050, sold in bulk (e.g., bulk trucks, railcars, ISO tanks, and isotainers).
- **Product 2**.-- PTMEG, grade 1000, molecular weight 950-1050, sold in packages (e.g., totes/IBCs, and drums).
- **Product 3**.-- PTMEG, grade 2000, molecular weight 1901-2117, sold in bilk(e.g., bulk trucks, railcars, ISO tanks, and isotainers).
- **Product 4**.-- PTMEG, grade 2000, molecular weight 1901-2117, sold in packages (e.g., totes/IBCs, and drums).

In this regard, Petitioner also requests that, in addition to price data on U.S. importers' sales to U.S. purchasers, the Commission collect purchase cost data for Products 1-4 from U.S. importers. Doing so would account for the fact that some U.S. importers internally consume significant amounts of PTMEG that they purchase from subject foreign producers.[139]

[138] *See* Lost Sales Lost Revenues Chart, provided as **Exhibit I-25**.
[139] *Compare* List of U.S. Importers, provided as **Exhibit I-15**, *with* List of U.S. Purchasers, provided as **Exhibit I-16**.

b. The subject imports have significantly depressed and suppressed the domestic industry's prices

In addition to underselling, the available information shows that the very low pricing levels being offered by the subject imports have also been depressing and suppressing domestic prices to a significant degree.[140] From 2023 to 2025, the average unit value of BASF's U.S. commercial shipments fell from [ ] per short ton to [ ] per short ton, a decline of [ ] percent. Furthermore, the domestic industry suffered a "cost-price squeeze" between 2023 and 2025, with BASF's ratio of cost of goods sold to net sales values increasing from [ ] percent in 2023 to [ ] percent in 2024, and then to [ ] percent in 2025.[141] As a result, Petitioner has experienced [ ] decline in its operating margins, which fell from [ ] percent in 2023 to [ ] percent in 2024 and then to [ ] percent in 2025. In sum, the aggressive pricing of subject imports has significantly depressed and suppressed U.S. prices for the domestic like product.

c. Lost sales and lost revenues

Exhibit I-25 contains examples of lost sales and lost revenues suffered by the Petitioner.[142] As this information shows, the domestic industry has lost significant sales and revenues due to aggressive pricing competition by the subject imports.[143] This evidence, combined with the other evidence cited above, leaves no doubt that the adverse price effects of subject imports have been significant.

[140] *See* 19 U.S.C. § 1677(7)(C)(ii)(II).
[141] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[142] In accordance with 19 C.F.R. § 207.11(b)(2)(v), Petitioner will submit lost sales and lost revenues allegations electronically in the manner specified in the Commission's Handbook on Filing Procedures.
[143] *See* Lost Sales Lost Revenues Chart, provided as **Exhibit I-25**.

4. The subject imports have had a significant adverse impact on the domestic industry

Under the Act, the Commission is directed to assess whether the subject imports have had a significant adverse impact on the industry's production operations in the United States.[144] When examining the impact of subject imports, the Commission is directed to evaluate all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to:

- actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity,
- factors affecting domestic prices,
- actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and
- actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product.[145]

The Commission must evaluate all relevant economic factors within the context of the business cycle and conditions of competition that are distinctive to the affected industry.[146]

The available evidence establishes that the significant volumes of unfairly traded, low-priced imports of PTMEG from China, South Korea, Taiwan, and Vietnam have had a significant adverse impact on the overall condition of the domestic industry. In particular, the evidence shows that:

- The subject imports from the subject countries took significant sales and market share from the domestic industry.

[144] 19 U.S.C. § 1677(7)(B)(i)(III).
[145] 19 U.S.C. § 1677(7)(C)(iii).
[146] 19 U.S.C. § 1677(7)(C)(iii).

- Between 2024 and 2025, the domestic industry's commercial U.S. shipments fell from [ ] short tons to [ ] short tons, for a decline of [ ] percent.[147]

- The domestic industry lost significant market share as subject imports' market share increased by [ ] percentage points between 2023 and 2025. In this regard, the market share of the domestic industry fell from [ ] percent in 2023 to [ ] percent in 2025, for a decline of [ ] percentage points.

- The growing presence of low-priced subject imports in the market had a significant negative impact on the domestic industry's production levels and capacity utilization rates during the period.[148]

  - Between 2024 and 2025, the domestic industry's production levels fell from [ ] short tons to [ ] short tons, for a decline of [ ] percent.[149]

  - The capacity utilization rate of the domestic industry also fell [ ], dropping from [ ] percent in 2024 to [ ] percent in 2025, which is obviously an [ ][150]

- The subject imports also had a [ ] adverse impact on the financial performance of the domestic industry.[151] In particular, the available evidence shows that:

  - Between 2023 and 2025, the total net sales values of the domestic producer fell from $[ ] to $[ ], for a decrease of [ ] percent. When compared the most recent calendar years, the total net sales values fell from $[ ] to $[ ], for a decrease of [ ] percent.[152]

  - The domestic industry's operating income or loss levels also deteriorated [ ] between 2023 and 2025, falling from a [ ] in 2023 to a [ ] in 2024 and then to a [ ] in 2025. The [ ] increased by [ ] percent from 2023 to 2025.[153]

  - Petitioner's operating margins [ ], dropping from [ ] percent in 2023 to [ ] percent in 2024, and [ ] percent in 2025.[154]

[147] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[148] *See* Apparent Domestic Consumption and U.S. Market Shares, provided as **Exhibit I-22**.
[149] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[150] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[151] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[152] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[153] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[154] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.

In sum, the available evidence makes clear that the significant volumes of unfairly priced imports from the subject countries have had a very negative impact on the condition of the domestic industry.

The subject imports have also had a significant negative impact on the existing development and production efforts of the domestic industry. BASF has made significant investments in its U.S. facilities in order to maintain the efficiency of its production lines and the quality of its PTMEG. Those investments are currently at risk because of the unfairly traded imports from the subject countries, given that their presence in the market has made it impossible for the domestic producer to obtain a fair rate of return on its PTMEG investments. This is further evidence of the harmful impact on the domestic industry.

Indeed, low-priced imports of PTMEG have been harming the domestic industry for years. Over the past two decades, the United States has lost two producers of PTMEG: [ ] and The LYCRA Company. [ ].[155] In [ ].[156] Similarly, in October 2020, The LYCRA Company closed its [ ] PTMEG facility at La Porte, Texas, making BASF the sole producer of PTMEG in the United States.[157] If the subject imports continue to be sold at extremely low, unfairly traded prices in the United States, [ ].

[155] *See* [ ], provided as **Exhibit I-1**.
[156] *See* [ ], provided as **Exhibit I-1**.
[157] *See* [ ] *see also* The LYCRA Company Sep. 2022 Quarterly Report at 4, provided as **Exhibit I-18**.

Given all of these facts, the Commission should find that the adverse impact of subject imports on the domestic industry was significant.

5. Conclusion

In sum, the available evidence relating to the volume of subject imports, the adverse price effects of subject imports, and the adverse impact of subject imports show that the domestic industry is materially injured by reason of subject imports. In this regard, the available evidence demonstrates that: (i) there has been a significant increase in the volumes and market share of the subject imports in the past three years, (ii) the subject imports have undersold the domestic like product significantly during the period and depressed and suppressed domestic prices, and (iii) the domestic industry's production, shipments, sales, revenues, market share, pricing, and profitability levels have all fallen [ ] because of the aggressive unfair pricing and sales competition from the subject imports. In other words, all of the available evidence demonstrates that the subject imports are causing material injury to the domestic industry.

D. The Subject Imports Threaten The Domestic Industry With Material Injury Going Forward

Under the Act, the Commission is directed to consider eight factors when determining whether an industry in the United States is threatened with material injury by reason of imports of the subject merchandise.[158] In addition to those eight factors, the Commission is also directed to consider "any other demonstrable adverse trends that indicate the probability that there is likely to be material injury" by reason of subject imports.[159] As discussed below, these factors indicate that, in the absence of trade relief, the subject imports threaten to cause further material injury to the domestic industry in the imminent future.

[158] *See* 19 U.S.C. §§ 1677(7)(F)(i)(I) to (VIII). Please note that one of these factors, which relates to raw agricultural products, is not relevant here. *See* 19 U.S.C. § 1677(7)(F)(i)(VII).
[159] 19 U.S.C. § 1677(7)(F)(i)(IX).

1. The Commission should cumulate the subject imports from all subject countries for purposes of its threat analysis

Under the Tariff Act, the Commission has the discretion to cumulate subject imports in its threat analysis if the petitions were filed on the same date and if such imports compete with one another and the domestic like product.[160] The Commission should cumulate the subject imports in these investigations, given that the petitions were filed on the same day, and the available information indicates a reasonable overlap of competition between and among subject imports from China, South Korea, Taiwan, and Vietnam and the domestic like product.

Additionally, no other factor warrants a decision not to cumulate the subject imports for purposes of the Commission's threat analysis. In particular, the subject imports from China, South Korea, Taiwan, and Vietnam shared similar volume and price trends during the period,[161] with the available evidence showing that (i) the volumes of the China, South Korea, Taiwan, and Vietnam imports have all grown between 2023 and 2025, and (ii) their prices have declined during the period.[162]

Moreover, the Hyosung Corporation, a major South Korean headquartered industrial conglomerate, owns significant producers of PTMEG in China and Vietnam.[163] Similarly, the Chang Chun Group owns and controls the Dairen Chemical Corporation, which has production facilities in China and Taiwan.[164] These relationships indicate that the producers in these

[160] 19 U.S.C. § 1677(7)(H).
[161] *See, e.g., Polyethylene Terephthalate Film, Sheet and Strip from Brazil, China, Thailand, and the United Arab Emirates*, Inv. Nos. 731-TA-1131-1134 (Final), USITC Pub. 4040 (Oct. 2008) (analyzing similarities in volume and pricing trends when assessing whether to cumulate the subject imports for purpose of its threat analysis) (adopted by *Polyethylene Terephthalate Film, Sheet, and Strip From Brazil, China, Thailand, and the United Arab Emirates*, 73 Fed. Reg. 36353 (U.S. Int'l Trade Comm'n June 26, 2008)).
[162] *See* Import Data, provided as **Exhibit I-13a**.
[163] *See* Hyosung, *Global Network*, provided as **Exhibit I-26**.
[164] *See* Dairen Chemical Corporation, *Profile*, provided as **Exhibit I-27**.

corporate groups have the ability to coordinate their sales to the U.S. market, which will mean that they can shift sales between these producers if imports from one or more of these countries are not subject to trade remedies. Given the facts, the Commission should exercise its discretion to cumulate these imports for purpose of its threat analysis in these investigations.

2. The likely volumes of the subject imports will be significant in the imminent future

Under the Act, when assessing whether the subject imports are threatening further injury to the domestic industry, the Commission is directed to consider several factors relating to the likely volume of subject imports in the absence of trade relief.[165] First, under the Act, the Commission is directed to consider whether there has been "a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports."[166] As we have already shown above, imports of PTMEG from the subject countries have increased significantly, both in absolute terms and relative to U.S. apparent consumption and domestic production.

In particular, during the period between 2023 and 2025, the volume of subject imports from China, South Korea, Taiwan, and Vietnam have increased significantly, rising by [ ] percent between 2023 and 2025.[167] Moreover, they have captured significant market share from the domestic industry, taking [ ] percentage points of market share from the domestic industry during this same period.[168] These facts show that, in the absence of trade relief, the subject imports will continue entering the market at significant volumes in the imminent future.

[165] 19 U.S.C. § 1677(7)(F)(i)(III).
[166] 19 U.S.C. § 1677(7)(F)(i)(III).
[167] *See* Import Data, provided as **Exhibit I-13b**.
[168] Apparent Domestic Consumption and U.S. Market Shares, provided as **Exhibit I-22**.

Under the Act, the Commission is also directed to consider whether there is "any existing unused capacity or {an} imminent, substantial increase in production capacity" in China, South Korea, Taiwan, and Vietnam that indicates "the likelihood of substantially increased imports of the subject merchandise into the United States."[169] As shown in the table below, the information reasonably available to Petitioner indicates that the subject industries have strikingly low utilization rates and enormous amounts of capacity that can be used to ship even larger volumes of PTMEG to the United States in the imminent future.[170]

Subject Capacity, Production, and Unused Capacity in 2025 (in short tons)

Country	Capacity	Production[1]	Capacity Utilization (%)	Unused Capacity
China	[			]
South Korea	[			]
Taiwan	[			]
Vietnam	[			]
Total	[			]

Source: [ ].
[1] The production volume of [ ].

Given that the production process for PTMEG is capital intensive, these data underscore the subject producers' strong financial incentives to use their available production and excess capacity to ship increased amounts of PTMEG to the United States.

Moreover, as can be seen from the table below, the aggregate amount of the unused capacity in the four subject countries is more than [ ] than total apparent U.S. consumption in 2025:

[169] 19 U.S.C. § 1677(7)(F)(i)(II).
[170] *See* [ ] provided as **Exhibit I-1**.

Ratio of unused capacity to apparent U.S. consumption (in short tons)

	2025
Unused Capacity of Subject Producers	[ ]
U.S. Apparent Consumption	[ ]
Ratio of unused capacity to apparent U.S. consumption	[ ]

Source: [ ]; Petitioner's Trade and Financial Data.

Given these data, it is obvious that the subject industries have ample amounts of unused capacity that can – and will – be used to flood the U.S. market with large amounts of low-priced, unfairly traded PTMEG.

Moreover, the available evidence indicates that the subject producers are expanding capacity. Even though the subject producers in China and Vietnam are operating at low capacity utilization rates, they are nonetheless expanding their capacity levels. For instance, PTMEG producers in China are expected to add [ ] short tons of production capacity between [ ].[171] Similarly, the Vietnamese producer [ ] intends to add [ ] short tons of production capacity by [ ].[172] As shown in the table below, this additional production capacity corresponds to more than [ ] the size of the U.S. market in 2025:

Planned Capacity Expansion

Country	Capacity increase
China	[ ]
Vietnam	[ ]
Total	[ ]
U.S. Apparent Consumption	[ ]
Ratio of planned capacity to apparent U.S. consumption	[ ]

[171] *See* [ ] provided as **Exhibit I-1**.
[172] *See* [ ] provided as **Exhibit I-1**.

Source: [ ]; Petitioner's Trade and Financial Data.

Finally, the subject industries rely heavily on exports. For example, in 2025, Chinese producers exported [ ] short tons of PTEMG to global markets, which is an amount that is equivalent to [ ] percent of U.S. apparent consumption in 2025.[173] Similarly, South Korean and Taiwanese producers exported [ ] short tons of PTMEG to global markets in 2025, an amount that is equivalent to [ ] percent of U.S. apparent consumption.[174] Finally, Vietnamese producers exported [ ] short tons of PTMEG in 2025. This amount is equivalent to [ ] percent of U.S. apparent consumption.[175] All of this indicates that the subject producers will be intent on continuing to increase their exports of PTMEG to the United States in the absence of trade relief.

The Act also directs the Commission to consider inventories of the subject merchandise.[176] The available evidence indicates that, with appropriate processing, PTMEG has significant shelf life and can be sold in significant volumes from inventory.[177] Therefore, it is likely that subject importers have the ability to build inventories that will continue weighing on the U.S. market, taking sales from the domestic industry, and placing downward pressure on U.S. pricing.

[173] [ ]

[174] [ ]

[175] [ ]

[176] 19 U.S.C. § 1677(7)(F)(i)(V).

[177] *See* Korea PTG Co., Ltd., Technical Data Sheet, provided as **Exhibit I-5** ("Shelf life of PTMEG is approximate 2 years, under condition that the product is stored in unopened, tightly sealed original container at no greater than 90℃ and is not contacted with air under a dry nitrogen blanket.").

Finally, under the Act, the Commission is directed to consider whether subject producers benefit from subsidies in their home market, especially export subsidies, and whether these subsidies make it more likely to cause them to increase their exports of the subject imports.[178] Commerce has recently found that the governments of the subject countries granted countervailable subsidies to producers in the chemical industries.[179] As a chemical product, these subsidies are likely to be available for PTMEG producers. Obviously, these subsidies, including the subsidies that are specifically tied to exports of the subject PTMEG, will encourage producers in the subject countries to increase their exports to the United States in the imminent future.

In sum, the available evidence indicates that the subject producers have ample amounts of unused capacity that can, and will, be used to ship significant additional volumes of additional PTMEG to the United States unless antidumping orders are issued. Moreover, the available evidence also indicates that the subject producers are expanding their production capacity, which will encourage subject producers to produce and ship significant amounts of additional PTMEG to the United States. Further, the subject producers rely heavily on exports, which means that they will continue to look for opportunities to increase their shipments of PTMEG to the United States. Finally, the subject producers are already shipping large volumes of PTMEG to the U.S.

[178] 19 U.S.C. § 1677(7)(F)(i)(V).
[179] *See e.g., Certain Epoxy Resins from the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances*, 90 Fed. Reg. 14628 (Dep't of Commerce Apr. 3, 2025); *Certain Epoxy Resins from the Republic of Korea: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination*, 90 Fed. Reg. 14605 (Dep't of Commerce Apr. 3, 2025); *Certain Monomers and Oligomers from Taiwan: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination*, 91 Fed. Reg. 3114 (Dep't of Commerce Jan. 26, 2026); Hard Empty Capsules from the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination, 90 Fed. Reg. 60620 (Dep't of Commerce Dec. 29, 2025) (in-scope product included products that can be imported under Chapter 39 of the HTSUS).

market and will, no doubt, continue doing so unless trade relief is imposed. In sum, the available evidence makes clear that, in the absence of trade relief, the subject producers will continue to increase their exports of PTMEG to the U.S. market.

3. The subject imports will have a significant adverse impact on domestic prices in the imminent future

As part of its threat analysis, the Commission is directed to consider "whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports."[180] Unless trade relief is provided to the domestic industry, the subject imports will enter the U.S. market at prices that will have a significant depressing and suppressing effect on domestic prices.

As demonstrated above, a high degree of substitutability exists between domestic and subject PTMEG. Moreover, PTMEG is typically sold on the basis of price. Importantly, between 2023 and 2025, the available evidence indicates that the subject imports have significantly undersold the domestic like product and otherwise depressed and suppressed domestic prices. Finally, by underselling the domestic product significantly, the subject imports have taken significant sales and market share from the domestic industry, effectively making it impossible for Petitioner to obtain a true market price for its PTMEG.

In short, the available evidence demonstrates that the subject imports will continue to be offered at prices that will put downward pressure on domestic pricing, suppress domestic pricing levels, and increase demand for unfairly traded imports in the imminent future. Accordingly, the Commission should find that, in the absence of trade relief, dumped imports will enter the U.S. market at prices that will likely depress and suppress domestic pricing to a significant degree.

[180] 19 U.S.C. § 1677(7)(F)(i)(I).

4. The subject imports will have a significant adverse impact on the domestic industry in the imminent future

Under the Act, the Commission must also consider whether the subject imports will have a significant impact on the existing development and production efforts of the domestic industry as part of its threat analysis.[181] In these investigations, there is no doubt that [

] Given this issue, the Commission should find that unless the antidumping duty orders are issued, the cumulated subject imports will continue to have a significant adverse impact on the domestic industry's ability to make the ongoing investments needed to maintain development and production efforts.

Finally, when assessing whether the subject imports will have a significant impact on the domestic industry unless trade relief is provided, the Commission typically considers whether the domestic industry is vulnerable to the adverse impact of the subject imports in the imminent future.[182] As we have already shown, between 2023 and 2025, the domestic industry's financial performance deteriorated [ ] because of subject imports.[183] Even though certain volume indicators improved somewhat from 2023 to 2024, all of the domestic industry's indicia deteriorated between 2024 and 2025.[184] In 2025, the domestic industry's production volumes, U.S. shipment volumes, and sales revenues declined [ ], and the domestic industry

[181] 19 U.S.C. § 1677(7)(F)(i)(VIII) & (IX).
[182] *E.g., Drill Pipe and Drill Collars from China*, Inv. Nos. 701-TA-474 & 731-TA-1176 (Final), USITC Pub. 4213 (February 2011) at 35-36 (adopted by *Drill Pipe and Drill Collars From China*, 76 Fed. Reg. 11812 (U.S. Int'l Trade Comm'n Mar. 3, 2011)).
[183] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.
[184] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.

has continued to experience [

].[185]

In other words, the domestic industry is clearly in a highly vulnerable condition that makes it susceptible to additional material injury by reason of the subject imports in the imminent future in the absence of trade relief. Given these considerations, the Commission should determine that, unless orders are issued here, the subject imports will continue to have a significant adverse impact on the domestic industry unless orders are imposed and that the subject imports from China, South Korea, Taiwan, and Vietnam threaten the domestic industry with additional material injury.

V. CONCLUSION

As set forth in the other volumes of these petitions, imports of PTMEG from China, South Korea, Taiwan, and Vietnam are sold at less than fair value in the United States. Moreover, as discussed above, the domestic industry has been materially injured, and is threatened with additional material injury, by reason of subject imports.

[185] *See* Petitioner's Trade and Financial Data, provided as **Exhibit I-21**.

To prevent further injury by these imports, Petitioner requests that Commerce initiate antidumping duty investigations on imports of PTMEG from China, South Korea, Taiwan, and Vietnam. Petitioner also requests that the Commission find that subject imports have caused material injury to domestic industry and threaten further material injury going forward. The future of domestic PTMEG manufacturing, its workers, and the security of domestic supply chains depend on Commerce and the Commission providing effective relief from unfair trade.

Respectfully submitted,

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EXHIBIT I-5

Korea PTG Co., Ltd.
15, Yongyeon-ro, 179 beon-gil, Nam-gu, Ulsan, 680-150, Korea
www.koreaptg.co.kr

Technical Data Sheet

March 2, 2018

PTMEG-1000 distributed by:

1. General Information

Formula: $H[O(CH_2)_4]_nOH$

CAS No.: 25190-06-1

Synonyms: Polytetramethylene ether glycol (PTMEG), Poly(oxytetramethylene) glycol, Polytetramethylene oxide (PTMO), Polybutylene glycol, Polytetrahydrofuran (PTHF)

Applications and Uses: PTMEG belongs to the class of polyether polyols which have excellent reactivity. It is used to make a high quality of polyurethane including spandex and copolyester-ether in such applications as:

- Polyurethane Elastomers
- Synthetic Leathers
- Paint, Coating Agent
- Adhesives, Sealants
- Polyester Elastomers
- Polyamide Elastomers

2. Specification

Item	Unit	Specification	Test Method
Appearance	-	Transparent liquid or white waxy solid at low temperature	Macrography
Molecular Weight	g/mol	1000±25	ASTM D4274
Hydroxyl No.	mgKOH/g	109.5~115.1	ASTM D4274
Viscosity @ 40℃	centipoise	Max 350	ASTM D 445
Acid No.	mgKOH/g	Max 0.05	DIN 53402
Water	wt ppm	Max 150	DIN 51777
Color	APHA	Max 40	ASTM D1209
BHT	wt ppm	220±50	by UV

3. Physical Properties

Item	Properties
Boiling Point	More than 250℃
Flash Point	More than 260℃
Melting Point	24℃
Specific Gravity (40/4℃)	0.981
Viscosity (40℃)	300~350 cP

15, Yongyeon-ro, 179 beon-gil, Nam-gu, Ulsan, 680-150, Korea
www.koreaptg.co.kr

March 2, 2018

4. Storage and Handling

Precautions

Because PTMEG is hygroscopic and oxidized, it is very important to protect PTMEG against exposure to moisture and air.

All Korea PTG's PTMEG contain oxidation inhibitors to prevent peroxides. PTMEG is ignitable at high temperature. Water spray, alcohol resistant foam, dry chemical or CO2 extinguishers may be used to fight fire. When water or foam is used, frothing may occur.

When PTMEG is impregnated into high-surface-area material such as fibrous insulation (e.g., glass fibre, rock wool), PTMEG can be decomposed rapidly, releasing very flammable tetrahydrofuran, gamma-butyrolactone, etc. and may ignite at temperatures as low as 100°C.

Steel Drum

Solidified PTMEG can be molten by being heated in melting room about 70℃ for about 2~3 days. Temperatures above 90℃ are not recommended for prolonged storage.

Drums should be stored in dry places such as warehouse with roof and before use any water on top plate of drums should be removed to prevent moisture contamination. During opening of drums and use of PTMEG in drums, nitrogen should be serviced into drums to avoid the contact with moisture and air.

ISO Tank

Shipping temperature of ISO tank for PTMEG is about 60℃. ISO tank is insulated and provided with heating coils for reheating. If temperature is low and the product is solidified, enough reheating is required for melting and careful attention is required to avoid plugging of vent, nitrogen gas line and product line. Insure that ISO tank is adequately grounded before connecting and unloading.

Storage Tank

The storage tank must be provided with external or internal heating to maintain a temperature of about 50~60℃ (Internal heating coil is recommended due to heating efficiency).

Because PTMEG is hygroscopic and oxidized, it is very important to protect PTMEG against exposure to moisture and air. Therefore, Korea PTG recommends that PTMEG should be stored in completely enclosed tanks or containers under a dry nitrogen blanket.

Stability

Shelf life of PTMEG is approximate 2 years, under condition that the product is stored in unopened, tightly sealed original container at no greater than 90℃ and is not contacted with air under a dry nitrogen blanket.

Shelf life is only guidance and is not a guarantee because there are various possibilities in site of end users to affect the quality of PTMEG.

EXHIBIT I-12

SECTION VII

PLASTICS AND ARTICLES THEREOF;
RUBBER AND ARTICLES THEREOF

Notes

1. Goods put up in sets consisting of two or more separate constituents, some or all of which fall in this section and are intended to be mixed together to obtain a product of section VI or VII, are to be classified in the heading appropriate to that product, provided that the constituents are:

   (a) Having regard to the manner in which they are put up, clearly identifiable as being intended to be used together without first being repacked;

   (b) Entered together; and

   (c) Identifiable, whether by their nature or by the relative proportions in which they are present, as being complementary one to another.

2. Except for the goods of heading 3918 or 3919, plastics, rubber, and articles thereof, printed with motifs, characters or pictorial representations, which are not merely subsidiary to the primary use of the goods, fall in chapter 49.

CHAPTER 39

PLASTICS AND ARTICLES THEREOF

Notes

1. Throughout the tariff schedule the expression "plastics" means those materials of headings 3901 to 3914 which are or have been capable, either at the moment of polymerization or at some subsequent stage, of being formed under external influence (usually heat and pressure, if necessary with a solvent or plasticizer) by molding, casting, extruding, rolling or other process into shapes which are retained on the removal of the external influence.

   Throughout the tariff schedule, any reference to "plastics" also includes vulcanized fiber. The expression, however, does not apply to materials regarded as textile materials of section XI.

2. This chapter does not cover:

   (a) Lubricating preparations of 2710 or 3403;

   (b) Waxes of heading 2712 or 3404;

   (c) Separate chemically defined organic compounds (chapter 29);

   (d) Heparin or its salts (heading 3001);

   (e) Solutions (other than collodions) consisting of any of the products specified in headings 3901 to 3913 in volatile organic solvents when the weight of the solvent exceeds 50 percent of the weight of the solution (heading 3208); stamping foils of heading 3212;

   (f) Organic surface-active agents or preparations of heading 3402;

   (g) Run gums or ester gums (heading 3806);

   (h) Prepared additives for mineral oils (including gasoline) or for other liquids used for the same purposes as mineral oil (heading 3811);

   (ij) Prepared hydraulic fluids based on polyglycols, silicones or other polymers of Chapter 39 (heading 3819);

   (k) Diagnostic or laboratory reagents on a backing of plastics (heading 3822);

   (l) Synthetic rubber, as defined for the purposes of chapter 40, or articles thereof;

   (m) Saddlery or harness (heading 4201) or trunks, suitcases, handbags or other containers of heading 4202;

   (n) Plaits, wickerwork or other articles of chapter 46;

   (o) Wall coverings of heading 4814;

   (p) Goods of section XI (textiles and textile articles);

   (q) Articles of section XII (for example, footwear, headgear, umbrellas, sun umbrellas, walking-sticks, whips, riding-crops or parts thereof);

   (r) Imitation jewelry of heading 7117;

   (s) Articles of section XVI (machines and mechanical or electrical appliances);

   (t) Parts of aircraft or vehicles of section XVII;

   (u) Articles of chapter 90 (for example, optical elements, spectacle frames, drawing instruments);

   (v) Articles of chapter 91 (for example, clock or watch cases);

   (w) Articles of chapter 92 (for example, musical instruments or parts thereof);

Notes (con.)

(x) Articles of chapter 94 (for example, furniture, luminaires and lighting fittings, illuminated signs, prefabricated buildings);

(y) Articles of chapter 95 (for example, toys, games, sports equipment); or

(z) Articles of chapter 96 (for example, brushes, buttons, slide fasteners, combs, mouthpieces or stems for smoking pipes, cigarette holders or the like, parts of vacuum flasks or the like, pens, mechanical pencils, and monopods, bipods, tripods and similar articles).

3. Headings 3901 to 3911 apply only to goods of a kind produced by chemical synthesis, falling in the following categories:

(a) Liquid synthetic polyolefins of which less than 60 percent by volume distills at 300°C, after conversion to 1,013 millibars when a reduced-pressure distillation method is used (headings 3901 and 3902);

(b) Resins, not highly polymerized, of the coumarone-indene type (heading 3911);

(c) Other synthetic polymers with an average of at least five monomer units;

(d) Silicones (heading 3910);

(e) Resols (heading 3909) and other prepolymers.

4. The expression "copolymers" covers all polymers in which no single monomer contributes 95 percent or more by weight to the total polymer content.

For the purposes of this chapter, except where the context otherwise requires, copolymers (including co-polycondensates, co-polyaddition products, block copolymers and graft copolymers) and polymer blends are to be classified in the heading covering polymers of that comonomer unit which predominates by weight over every other single comonomer unit. For the purposes of this note, constituent comonomer units of polymers falling in the same heading shall be taken together.

If no single comonomer predominates, copolymers or polymer blends, as the case may be, are to be classified in the heading which occurs last in numerical order among those which equally merit consideration.

5. Chemically modified polymers, that is, those in which only appendages to the main polymer chain have been changed by chemical reaction, are to be classified in the heading appropriate to the unmodified polymer. This provision does not apply to graft copolymers.

6. In headings 3901 to 3914, the expression "primary forms" applies only to the following forms:

(a) Liquids and pastes, including dispersions (emulsions and suspensions) and solutions;

(b) Blocks of irregular shape, lumps, powders (including molding powders), granules, flakes and similar bulk forms.

7. Heading 3915 does not apply to waste, parings and scrap of a single thermoplastic material, transformed into primary forms (headings 3901 to 3914).

8. For the purposes of heading 3917, the expression "tubes, pipes and hoses" means hollow products, whether semimanufactures or finished products, of a kind generally used for conveying, conducting or distributing gases or liquids (for example, ribbed garden hose, perforated tubes). This expression also includes sausage casings and other lay-flat tubing. However, except for the last mentioned, those having an internal cross section other than round, oval, rectangular (in which the length does not exceed 1.5 times the width) or in the shape of a regular polygon are not to be regarded as tubes, pipes and hoses, but as profile shapes.

9. For the purposes of heading 3918, the expression "wall or ceiling coverings of plastics" applies to products in rolls, of a width not less than 45 cm, suitable for wall or ceiling decoration, consisting of plastics fixed permanently on a backing of any material other than paper, the layer of plastics (on the face side) being grained, embossed, colored, design-printed or otherwise decorated.

10. In headings 3920 and 3921, the expression "plates, sheets, film, foil and strip" applies only to plates, sheets, film, foil and strip (other than those of chapter 54) and to blocks of regular geometric shape, whether or not printed or otherwise surface-worked, uncut or cut into rectangles (including squares) but not further worked (even if when so cut they become articles ready for use).

11. Heading 3925 applies only to the following articles, not being products covered by any of the earlier headings of subchapter II:

(a) Reservoirs, tanks (including septic tanks), vats and similar containers, of a capacity exceeding 300 liters;

(b) Structural elements used, for example, in floors, walls or partitions, ceilings or roofs;

Notes (con.)

(c) Gutters and fittings therefor;

(d) Doors, windows and their frames and thresholds for doors;

(e) Balconies, balustrades, fencing, gates and similar barriers;

(f) Shutters, blinds (including venetian blinds) and similar articles and parts and fittings thereof;

(g) Large-scale shelving for assembly and permanent installation, for example, in shops, workshops, warehouses;

(h) Ornamental architectural features, for example, flutings, cupolas, dovecotes; and

(ij) Fittings and mountings intended for permanent installation in or on doors, windows, staircases, walls or other parts of buildings, for example, knobs, handles, hooks, brackets, towel rails, switch plates and other protective plates.

Subheading Notes

1. Within any one heading of this chapter, polymers (including copolymers) are to be classified according to the following provisions:

(a) Where there is a subheading named "Other" in the same series:

(1) The designation in a subheading of a polymer by the prefix "poly" (for example, polyethylene and polyamide-6,6) means that the constituent monomer unit or monomer units of the named polymer taken together must contribute 95 percent or more by weight of the total polymer content.

(2) The copolymers named in subheadings 3901.30, 3901.40, 3903.20, 3903.30 and 3904.30 are to be classified in those subheadings, provided that the comonomer units of the named copolymers contribute 95 percent or more by weight of the total polymer content.

(3) Chemically modified polymers are to be classified in the subheading named "Other", provided that the chemically modified polymers are not more specifically covered by another subheading.

(4) Polymers not meeting (1), (2), or (3), above, are to be classified in the subheading, among the remaining subheadings in the series, covering polymers of that monomer unit which predominates by weight over every other single comonomer unit. For this purpose, constituent monomer units of polymers falling in the same subheading shall be taken together. Only the constituent comonomer units of the polymers in the series of subheadings under consideration are to be compared.

(b) Where there is no subheading named "Other" in the same series:

(1) Polymers are to be classified in the subheading covering polymers of that monomer unit which predominates by weight over every other single comonomer unit. For this purpose, constituent monomer units of polymers falling in the same subheading shall be taken together. Only the constituent comonomer units of the polymers in the series under consideration are to be compared.

(2) Chemically modified polymers are to be classified in the subheading appropriate to the unmodified polymer.

Polymer blends are to be classified in the same subheading as polymers of the same monomer units in the same proportions.

2. For the purposes of subheading 3920.43, the term “plasticizers” includes secondary plasticizers.

Additional U.S. Notes

1. For the purposes of this chapter, the term "elastomeric" means a plastics material which after cross-linking can be stretched at 20°C to at least three times its original length and that, after having been stretched to twice its original length and the stress removed, returns within five minutes to less than 150 percent of its original length. Elastomeric plastics may also contain fillers, extenders, pigments or rubber-processing chemicals, whether or not such plastics material, after the addition of such fillers, extenders, pigments or chemicals, can meet the tests specified in the first part of this note.

2. For the purposes of heading 3916, the rate of duty "Free (B)" appearing in the "Special" subcolumn applies only to articles measuring not more than 38.1 cm in length.

3. For the purposes of heading 3917, with respect to tubes, pipes and hoses, the rate of duty "Free (C)" appearing in the "Special" subcolumn applies only to tubes, pipes and hoses having attached fittings.

Subheading Notes (con.)

4. For the purposes of heading 3921, the rate of duty "Free (B)" appearing in the "Special" subcolumn applies only to articles measuring not more than 38.1 cm in width and not more than 45.7 cm in length.

5. For the purposes of heading 3924, the expression “household articles” does not include photo albums (see subheading 3926.90.48).

Statistical Note

1. For the purposes of statistical reporting number 3904.61.0010, the term “granular” refers to polytetrafluoroethylene (PTFE) resins and raw polymer produced by suspension polymerization as determined by ASTM D 4894-98a or PTFE compounds produced therefrom as determined by ASTM D 4745, or micropowders from such resins or raw polymer as determined by ASTM D 5675 (Group 1, Class 1,4,6).

2. For the purposes of statistical reporting number 3918.10.1030, an expanded polymer core is a core that includes foaming agents.

Heading/ Subheading	Stat. Suf-fix	Article Description	Unit of Quantity	Rates of Duty 1 General	Rates of Duty 1 Special	Rates of Duty 2
3906		Acrylic polymers in primary forms:				
3906.10.00	00	Poly(methyl methacrylate)	kg	6.3%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, KR, MA, OM, P, PA, PE, S, SG)	37%
3906.90		Other:				
3906.90.10	00	Elastomeric	kg	Free[1/]		20%
		Other:				
3906.90.20	00	Plastics	kg	6.3%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, KR, MA, OM, P, PA, PE, S, SG)	37%
3906.90.50	00	Other[4/]	kg	4.2%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	25%[3/]
3907		Polyacetals, other polyethers and epoxide resins, in primary forms; polycarbonates, alkyd resins, polyallyl esters and other polyesters, in primary forms:				
3907.10.00	00	Polyacetals	kg	6.5%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	2.2¢/kg + 33.5%
		Other polyethers:				
3907.21.00	00	Bis(polyoxyethylene) methylphosphonate	kg	6.5%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	2.2¢/kg + 33.5%[3/]
3907.29.00	00	Other	kg	6.5%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	2.2¢/kg + 33.5%[3/]
3907.30.00	00	Epoxide resins	kg	6.1%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 47%
3907.40.00	00	Polycarbonates	kg	5.8%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
3907.50.00	00	Alkyd resins	kg	6.5%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%

Heading/ Subheading	Stat. Suf-fix	Article Description	Unit of Quantity	Rates of Duty 1 General	Rates of Duty 1 Special	Rates of Duty 2
3907 (con.)		Polyacetals, other polyethers and epoxide resins, in primary forms; polycarbonates, alkyd resins, polyallyl esters and other polyesters, in primary forms: (con.)				
		Poly(ethylene terephthalate):				
3907.61.00		Having a viscosity number of 78 ml/g or higher		6.5%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
	10	Having a viscosity number of 78 ml/g or more but not more than 88 ml/g	kg			
	50	Other	kg			
3907.69.00		Other		6.5%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
	10	Having a viscosity number of 70 ml/g or more but less than 78 ml/g	kg			
	50	Other	kg			
3907.70.00	00	Poly(lactic acid)	kg	6.5%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
		Other polyesters:				
3907.91		Unsaturated:				
		Allyl resins:				
3907.91.20	00	Allyl resins, uncompounded	kg	Free[1/]		15.4¢/kg + 45%
3907.91.40	00	Other	kg	5.8%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
3907.91.50	00	Other	kg	6.5%[1/]	Free (A, AU, BH, CL, CO, D, E, IL, JO, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
3907.99		Other:				
3907.99.20	00	Thermoplastic liquid crystal aromatic polyester copolymers	kg	Free[1/]		15.4¢/kg + 45%
3907.99.50		Other		6.5%[1/]	Free (A*, AU, BH, CL, CO, D, E, IL, JO, K, KR, MA, OM, P, PA, PE, S, SG)	15.4¢/kg + 45%
	10	Polybutylene terephthalate	kg			
	50	Other	kg			

EXHIBIT I-13

EXHIBIT I-13a

U.S. IMPORTS OF POLYETHERS, NESOI (PTMEG)

Quantity (KG)

	2023	2024	2025	Change '23 to '25	Change '24 to '25
South Korea	53,774	78,378	90,660	68.6%	15.7%
China	38,856	43,871	29,743	-23.5%	-32.2%
Taiwan	9,232	9,341	12,825	38.9%	37.3%
Vietnam	3,520	6,039	7,807	121.8%	29.3%
Subject Countries	**105,381**	**137,629**	**141,035**	**33.8%**	**2.5%**
Canada	9,755	9,961	15,136	55.2%	52.0%
Germany	14,642	15,720	14,078	-3.9%	-10.4%
Belgium	6,523	4,870	5,072	-22.2%	4.2%
Mexico	5,964	6,488	4,850	-18.7%	-25.3%
Netherlands	2,260	3,602	4,610	104.0%	28.0%
Japan	4,135	4,026	3,797	-8.2%	-5.7%
All Others Countries	12,235	16,875	15,608	27.6%	-7.5%
World	**160,895**	**199,171**	**204,185**	**26.9%**	**2.5%**

C.I.F. Value

	2023	2024	2025	Change '23 to '25	Change '24 to '25
South Korea	119,392,715	162,088,380	177,344,883	48.5%	9.4%
China	61,930,774	68,038,618	40,421,703	-34.7%	-40.6%
Taiwan	23,528,638	20,721,806	23,593,920	0.3%	13.9%
Vietnam	8,214,125	12,609,896	14,473,120	76.2%	14.8%
Subject Countries	**213,066,252**	**263,458,700**	**255,833,626**	**20.1%**	**-2.9%**
Canada	31,003,866	27,423,703	44,465,210	43.4%	62.1%
Germany	67,932,982	71,195,463	64,060,248	-5.7%	-10.0%
Belgium	16,773,318	14,819,585	14,755,199	-12.0%	-0.4%
Mexico	19,008,516	19,348,834	15,379,276	-19.1%	-20.5%
Netherlands	9,051,439	15,238,786	15,252,373	68.5%	0.1%
Japan	45,807,514	46,976,622	70,724,052	54.4%	50.6%
All Others Countries	115,815,948	106,146,335	88,498,564	-23.6%	-16.6%
World	**518,459,835**	**564,608,028**	**568,968,548**	**9.7%**	**0.8%**

C.I.F. Value Per Short Ton

	2023	2024	2025	Change '23 to '25	Change '24 to '25
South Korea	2,220	2,068	1,956	-11.9%	-5.4%
China	1,594	1,551	1,359	-14.7%	-12.4%
Taiwan	2,549	2,218	1,840	-27.8%	-17.1%
Vietnam	2,334	2,088	1,854	-20.6%	-11.2%
Subject Countries	**2,022**	**1,914**	**1,814**	**-10.3%**	**-5.2%**
Canada	3,178	2,753	2,938	-7.6%	6.7%
Germany	4,640	4,529	4,551	-1.9%	0.5%
Belgium	2,571	3,043	2,909	13.1%	-4.4%
Mexico	3,187	2,982	3,171	-0.5%	6.3%
Netherlands	4,005	4,231	3,308	-17.4%	-21.8%
Japan	11,078	11,668	18,629	68.2%	59.7%
All Others Countries	9,466	6,290	5,670	-40.1%	-9.9%
World	**3,222**	**2,835**	**2,787**	**-13.5%**	**-1.7%**

Source: USITC Dataweb HTS Nos. 3907.29.0000

EXHIBIT I-13b

Imports of PTMEG (in short tons)

	2023	2024	2025	23-25	24-25
South Korea	[				]
China	[				]
Taiwan	[				]
Vietnam	[				]
Subject countries	**[**				]
Western Europe	[				]
Japan	[				]
Other	[				]
Total	**[**				]

Source: [ ]

EXHIBIT I-14

Producers And Exporters of PTMEG From China

1. Chang Chun Dairen Chemical (Panjin) Co., Ltd.

Address: Liaodongwan New Zone, Panjin, Liaoning, 124221 China
Website: https://www.ccpgp.com/en/CP/2431/1287/
Contact: N/A
Telephone: 86-427-677-5001
Email: N/A

2. Dairen Chemical (Jiangsu) Co., Ltd.

Address: No. 1, Dalian Road, Yangzhou Chemical Industry Park, Yizheng, Jiangsu, 211900 China
Website: https://www.dcc.com.tw/en/
Contact: N/A
Telephone: 86-514-8326-8888
Email: service@dcc.com.tw

3. Chongqing Jianfeng Industrial Group Co., Ltd.

Address: Baitao Sub-District, Fuling District Chongqing, Chongqing, 408601 China
Website: https://cnjf.com/aspx/en/about.aspx?classid=119
Contact: N/A
Telephone: N/A
Email: N/A

4. Hangzhou Sanlong New Material Co., Ltd.

Address: Linjiang Industrial Park, Qiantang New District, Hangzhou, 311228 China
Website: http://www.slxc.com.cn
Contact: N/A
Telephone: 86-571-8276-9856
Email: csl@qingyungf.com

5. Hebi Coal Chemical Co., Ltd.

Address: Baoyuan Road (E. Section), Baoshan Cycle Economic Industry Cluster Zone, Hebi, Henan, 456650 China
Website: N/A
Contact: N/A
Telephone: N/A
Email: N/A

6. Hengli Petrochemical (Dalian) New Material Technology Co., Ltd.

Address: 299 Chang Song Road, Chang Xing Island, Dalian City, Liaoning Province, 116000 China
Website: https://global.hengli.com/
Contact: N/A
Telephone: 86-411-8664-1378
Email: globalsales@hengli.com

7. Hyosung Chemicals (Jiaxing) Co., Ltd.

Address: No. 399, Zhongshan West Road, Jiaxing Gangqu (Zhapu), Zhejiang, 314000 China
Website: https://www.hyosungchemical.com/en
Contact: N/A
Telephone: 86-20-3765-7458
Email: N/A

8. Hyosung Spandex (Ningxia) Co., Ltd.

Address: Ningdong Energy and Chemical Industry Base, Ningdong, Ningxia Hui, 750000 China
Website: https://www.hyosung.com/en/index
Contact: N/A
Telephone: N/A
Email: N/A

9. Inner Mongolia Huaheng Energy Technology Co., Ltd.

Address: Wangfu Road, Wulanhua Town, Siziwang Banner Siziwang Banner, Inner Mongolia, 011800 China
Website: https://www.spandex-tech.com/
Contact: N/A
Telephone: 86-512-6325-9270
Email: huahaigroup-Samuel@outlook.com

10. Inner Mongolia Junzheng Chemical Industry Co., Ltd.

Address: Wuhai Wuda Industrial Park, Wuhai, Inner Mongolia, 016040 China
Website: https://www.junzhenggroup.com/
Contact: N/A
Telephone: 86-473-691-3894
Email: wudahuagong@junzhengroup.com

11. Inner Mongolia Sunway New Materials Co., Ltd.

Address: Low Carbon Industrial Park, Economic and Technological Development Zone, Wuhai City, Inner Mongolia, 47300 China
Website: N/A
Contact: Mr. Chen
Telephone: 86-152-6886-0396
Email: N/A

12. Ningxia Ningdong Taihe New Materials Co., Ltd.

Address: Ningdong, Ningxia Hui, 750000 China
Website: N/A
Contact: N/A
Telephone: N/A
Email: N/A

13. Shaanxi Shanhua Coal Chemical Group Co., Ltd.

Address: Guapo Town, Huazhou District Weinan, Shaanxi, 714000 China
Website: N/A
Contact: N/A
Telephone: N/A
Email: N/A

14. Shaanxi Yanchang Petroleum (Group) Co., Ltd.

Address: No.75 Keji 2Rd, Xi'an, Shaanxi, 710075 China
Website: https://en.sxycpc.com
Contact: N/A
Telephone: 86-29-8889-9666
Email: N/A

15. Shanxi Sanwei Huabang Group Co., Ltd.

Address: Zhaocheng Town, Hongdong County Linfen, Shanxi, 041602 China
Website: N/A
Contact: N/A
Telephone: N/A
Email: N/A

16. Sichuan Tianhua Fubang Co., Ltd.

Address: Lingang Street, Hejiang County, Luzhou, Sichuan, 646000 China
Website: www.scth.com.cn
Contact: N/A
Telephone: 86-830-548-2202
Email: N/A

17. Sinopec Great Wall Energy and Chemical (Ningxia) Co., Ltd.

Address: Ningdong Coal Chemical Area C, Yinchuan, Ningxia, 750000 China
Website: http://nxnh.sinopec.com/nxnh/
Contact: N/A
Telephone: 86-951-309-8765
Email: N/A

18. Verde Markor Chemical Material (Xinjiang) Co., Ltd.

Address: No. 1 Nanyuan Road, Korla Economic and Technological Development Zone, Bazhou, Xinjiang, 843800 China
Website: N/A
Contact: N/A
Telephone: N/A
Email: N/A

19. Xinjiang Blue Ridge Tunhe Energy Co., Ltd.

Address: 132 East Wuyi Road, Changji, Xinjiang, 831100 China
Website: https://www.lanshantunhe.com/en/
Contact: Liz Lay
Telephone: 86-136-2995-6974
Email: leizixian@lanshantunhe.com

20. Xinjiang Guotai Xinhua Chemical Co., Ltd.

Address: No. 88 Guotai Road, Cainan Industrial Park, Zhundong Economic and Technological Development Zone, Changji, Xinjiang, 831100 China
Website: N/A
Contact: N/A
Telephone: N/A
Email: N/A

21. BASF Chemical Co., Ltd. (BACH)

Address: 333 Jiangxinsha Road, Pudong, Shanghai, 200120 China
Website: https://www.basf.com/cn/en
Contact: [ ]
Telephone: [ ]
Email: [ ]

Producers And Exporters of PTMEG From South Korea

1. BASF Company Ltd.

Address: 15-16F, KCCI Bldg., 39, Sejong-daero, Jung-gu, Seoul, 04513, Korea
Website: https://www.basf.com/kr/en
Contact: [ ]
Telephone: [ ]
Email: [ ]

2. Korea PTG Co., Ltd.

Address: 10th Floor, Yongsan Building, 273 Hangang-daero Yongsan-Gu, Seoul, Korea, 04321
Website: http://www.koreaptg.co.kr/
Contact: N/A
Telephone: 82-2-717-7005
Email: N/A

Producers And Exporters of PTMEG From Taiwan

1. Dairen Chemical Corporation

Address: 18F, No. 223, Songjiang Rd., Taipei City, Taipei, 104472 Taiwan
Website: https://www.dcc.com.tw/en/
Contact: N/A
Telephone: 886-2-7752-2800
Email: service@dcc.com.tw

2. Formosa Asahi Spandex Co., Ltd.

Address: 7F., No.607, Ruiguang Rd., Neihu Dist., Taipei City, 114 Taiwan
Website: http://www.formosaasahi.com.tw/fas.html
Contact: N/A
Telephone: 886-2-2712-2211
Email: sale-fas@fpg.com.tw

Producers And Exporters of PTMEG From Vietnam

1. Hyosung Dong Nai Co., Ltd.

Address: N2 Street, Nhon Trach 5 Industrial Zone, Hiep Phuoc Town, Nhon Trach District, Dong Nai Province, 76250 Vietnam
Website: http://www.hyosungvina.com/en/
Contact: N/A
Telephone: 84-2513-566-000
Email: N/A

EXHIBIT I-19

EXHIBIT I-19a

U.S. IMPORTS OF POLYETHERS, NESOI (PTMEG)

Quantity (Short Ton)

	2025												2026		12 Month	12 Month	Percent of
	January	February	March	April	May	June	July	August	September	October	November	December	January	February	Average	Total	Total
South Korea	6,896	4,562	7,062	7,979	8,104	8,369	11,231	8,614	9,573	6,890	5,451	5,928	5,975	5,324	7,542	90,501	**45.7%**
China	6,065	2,535	2,933	2,921	2,851	2,779	2,129	1,225	1,824	2,600	734	1,149	1,600	954	1,975	23,697	**12.0%**
Taiwan	801	498	1,339	1,626	2,106	1,513	1,272	1,119	634	607	758	550	743	561	1,069	12,829	**6.5%**
Vietnam	633	434	892	716	880	681	704	457	608	665	476	660	197	459	616	7,396	**3.7%**
Canada	1,415	1,326	1,159	772	1,014	1,206	1,142	1,065	1,569	1,403	1,719	1,346	1,703	1,855	1,329	15,952	8.1%
Germany	1,058	1,058	1,577	1,257	1,531	1,522	1,212	1,364	1,022	808	894	774	1,152	1,189	1,192	14,303	7.2%
Belgium	292	89	609	353	449	771	339	806	253	335	625	151	344	375	451	5,410	2.7%
Mexico	518	422	527	526	455	270	552	287	217	235	416	424	554	519	415	4,983	2.5%
Netherlands	496	328	183	619	258	255	366	444	590	420	367	283	142	264	349	4,192	2.1%
Japan	380	395	398	377	307	117	345	412	321	265	188	291	421	198	303	3,640	1.8%
Colombia	137	500	236	189	234	169	389	374	437	407	270	166	223	66	263	3,159	1.6%
Singapore	325	60	66	335	450	496	545	15	57	143	228	3	79	238	221	2,655	1.3%
Italy	126	223	313	58	223	150	138	279	118	150	176	222	145	12	165	1,983	1.0%
Thailand	17	22	112	147	201	205	156	217	434	141	163	78	220	122	183	2,197	1.1%
United Kingdom	75	51	133	112	125	43	100	100	28	50	76	33	113	60	81	974	0.5%
Poland	20	193	50	110	99	90	1	46	7	19	40	60	22	-	45	544	0.3%
Spain	1	110	40	59	15	82	66	26	52	68	53	80	91	68	58	699	0.4%
All Others Countries	86	208	408	168	202	426	427	273	379	222	106	93	175	171	254	3,049	1.5%
World	**19,342**	**13,011**	**18,036**	**18,325**	**19,505**	**19,144**	**21,114**	**17,122**	**18,125**	**15,429**	**12,740**	**12,291**	**13,899**	**12,435**	**16,514**	**198,165**	**100.0%**

Source: USITC Dataweb HTS Nos. 3907.29.0000

EXHIBIT I-19b

Imports of PTMEG (in short tons)

	2025	Negligibility
South Korea	[	]
China	[	]
Taiwan	[	]
Vietnam	[	]
Subject countries	**[**	]
Western Europe	[	]
Japan	[	]
Other	[	]
Total	**[**	]

Source: [ ]

EXHIBIT I-20

U.S. IMPORTS OF UNDER HTS 3907.29.0000 DURING 2025 BY GEOGRAPHIC REGION

Region and Country of Origin	Quantity (short tons)
Central Southwest	**24,359.44**
China	3,465.47
South Korea	20,541.75
Taiwan	59.85
Vietnam	292.37
Midwest	**16,969.05**
China	3,656.74
South Korea	9,183.57
Taiwan	3,632.25
Vietnam	496.48
Mountains	**37.93**
China	0.04
South Korea	19.84
Taiwan	0.41
Vietnam	17.64
Northeast	**15,003.69**
China	3,484.55
South Korea	7,974.77
Taiwan	846.38
Vietnam	2,697.99
Other	**261.36**
China	0.59
South Korea	172.32
Taiwan	88.45
Pacific	**25,705.97**
China	6,170.65
South Korea	18,863.43
Taiwan	264.10
Vietnam	407.80
Southeast	**58,698.57**
China	12,965.35
South Korea	33,904.58
Taiwan	7,933.85
Vietnam	3,894.79
Grand Total	**141,036.02**

Source: U.S. Census Official Import Statistics
Imports classified by District of Entry