

July 25, 2011

**MEMORANDUM TO:** Ronald K. Lorentzen  
Deputy Assistant Secretary  
for Import Administration

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

**SUBJECT:** Issues and Decision Memorandum for the Final Results of  
the Expedited Third Sunset Reviews of the Antidumping  
Duty Orders on Sulfanilic Acid from India and the People's  
Republic of China

### **Summary**

We have analyzed the substantive responses of the interested party in the third sunset reviews of the antidumping duty orders covering sulfanilic acid from India and the People's Republic of China ("PRC"). We recommend that you approve the positions we developed in the "Discussion of the Issues" section of this memorandum. Below is the complete list of the issues in these sunset reviews for which we received a substantive response:

1. Likelihood of continuation or recurrence of dumping
2. Magnitude of the margin likely to prevail

### **History of the Orders**

In 1992, the Department of Commerce ("Department") issued an antidumping duty order on imports of sulfanilic acid from the PRC. Respondent China National Chemicals Import & Export Corporation (Hebei Branch) received a margin of 19.14 percent, and the Department determined the "all others" country-wide rate to be 85.20 percent.<sup>1</sup> In 1993, the Department published an antidumping duty order on sulfanilic acid from India with an "all others" rate of 114.8 percent.<sup>2</sup> Since the antidumping duty orders were issued, the

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<sup>1</sup> See *Antidumping Duty Order: Sulfanilic Acid from the People's Republic from China*, 57 FR 37524 (August 19, 1992).

<sup>2</sup> In the final determination, the Department published a weighted-average dumping margin for all manufacturers/producers/exporters of 114.8 percent. However, consistent with section 772(d)(1)(D) of the Act, which prohibits assessing antidumping duties on the portion of the margin attributable to an export

Department has conducted eight administrative reviews with respect to sulfanilic acid from the PRC, none of which fell during the five-year period of this third sunset review.<sup>3</sup> The Department has not conducted any administrative reviews with respect to sulfanilic acid from India since the issuance of the order. The antidumping duty orders remain in effect for all manufacturers and exporters of the subject merchandise from India and the PRC.

The Department has not conducted any changed circumstances reviews for these antidumping duty orders. Prior to the second sunset review, the Department conducted a scope ruling regarding 3V Corporation and determined that sodium sulfanilate processed in Italy from sulfanilic acid from India was within the scope of the antidumping duty order on sulfanilic acid from India.<sup>4</sup>

The Department published its notice of initiation of the first sunset reviews on October 1, 1999, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”).<sup>5</sup> As a result of those reviews, the Department found that revocation of the antidumping duty orders would be likely to lead to continuation or recurrence of dumping in both India and the PRC.<sup>6</sup> On May 26, 2000, the International Trade Commission (“ITC”) determined, pursuant to section 751(c) of the Act, that revocation of the antidumping duty orders on sulfanilic acid from India and the PRC would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>7</sup> On June 8, 2000, the Department published the notice of continuation of the antidumping orders on sulfanilic acid.<sup>8</sup>

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subsidy, we established, for duty deposit purposes, an estimated antidumping duty deposit rate of 71.09 percent. *See Antidumping Duty Order: Sulfanilic Acid from India*, 58 FR 12025 (March 2, 1993).

<sup>3</sup> *See Sulfanilic Acid From the People’s Republic of China; Final Results of Antidumping Duty Administrative Review*, 61 FR 53711 (October 15, 1996) (POR 1993-94); *Sulfanilic Acid From the People’s Republic of China; Final Results and Partial Rescission of Antidumping Duty Administrative Review*, 61 FR 53702 (October 15, 1996) (POR 1994-95); *Sulfanilic Acid From the People’s Republic of China; Final Results of Antidumping Duty Administrative Review*, 62 FR 48597 (September 16, 1997) (POR 1995-96); *Sulfanilic Acid From the People’s Republic of China; Final Results of Antidumping Duty Administrative Review*, 63 FR 63834 (November 17, 1998) (POR 1996-97); *Sulfanilic Acid From the People’s Republic of China; Final Results of Antidumping Duty Administrative Review*, 65 FR 13366 (March 13, 2000) (POR 1997-98) (amended by *Sulfanilic Acid From the People’s Republic of China: Amendment of Final Results of Antidumping Duty Administrative Review*, 65 FR 18300 (April 7, 2000)); *Sulfanilic Acid From the People’s Republic of China; Final Results of Antidumping Duty Administrative Review*, 66 FR 15837 (March 21, 2001) (POR 1998-99); *Sulfanilic Acid From the People’s Republic of China; Final Results and Final Partial Rescission of Antidumping Duty Administrative Review*, 67 FR 1962 (January 15, 2002) (POR 1999-2000); and *Sulfanilic Acid From the People’s Republic of China; Final Results and Partial Rescission of Antidumping Duty Administrative Review*, 67 FR 70404 (November 22, 2002) (POR 2000-01).

<sup>4</sup> *See Notice of Scope Rulings*, 65 FR 41957, 41958 (July 7, 2000).

<sup>5</sup> *See Initiation of Five-Year (“Sunset”) Reviews*, 64 FR 53320 (October 1, 1999).

<sup>6</sup> *See Final Results of Expedited Sunset Reviews: Sulfanilic Acid From India and the People’s Republic of China*, 65 FR 6156 (February 8, 2000) (“*First Sunset Reviews*”).

<sup>7</sup> *See Sulfanilic Acid From India and China*, 65 FR 34232 (May 26, 2000) and USITC Pub. 3301, Inv. Nos. 701- TA-318 (Review) and 731-TA-538 and 561 (Review) (May 2000).

<sup>8</sup> *See Continuation of Antidumping Duty Orders: Sulfanilic Acid From People’s Republic of China and India; and Continuation of Countervailing Duty Order: Sulfanilic Acid From India*, 65 FR 36404 (as amended by *Correction to the Notices of Continuation of Antidumping Duty Orders: Sulfanilic Acid From*

On May 2, 2005, the Department published the notice of initiation of the second sunset reviews of the antidumping duty orders on sulfanilic acid from India and the PRC pursuant to section 751(c) of the Act.<sup>9</sup> As a result of those reviews, the Department found that revocation of the antidumping duty orders would be likely to lead to continuation or recurrence of dumping.<sup>10</sup> On April 27, 2006, the ITC determined, pursuant to section 751(c) of the Act, that revocation of the antidumping duty orders on sulfanilic acid from India and the PRC would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>11</sup> On May 11, 2006, the Department published the notice of continuation of the antidumping orders on sulfanilic acid for India and the PRC.<sup>12</sup>

## Background

On April 1, 2011, the Department published the notice of initiation of the third sunset reviews of the antidumping duty orders on sulfanilic acid from India and the PRC, pursuant to section 751(c) of the Act.<sup>13</sup> The Department received notice of intent to participate from Nation Ford Chemical Company (“NFC”), within the deadline specified in section 351.218(d)(1)(i) of the Department’s regulations. NFC claimed interested party status under section 771(9)(C) of the Act, as a domestic producer of sulfanilic acid. We received a complete substantive response from NFC within the 30-day deadline specified in section 351.218(d)(3)(i) of the Department’s regulations. We did not receive any responses from respondent interested parties in either proceeding. As a result, pursuant to section 751(c)(3)(B) of the Act and section 351.218(e)(1)(ii)(C)(2) of the Department’s regulations, the Department conducted expedited (120-day) sunset reviews of the orders from India and the PRC.

## Discussion of the Issues

In accordance with section 751(c)(1) of the Act, the Department conducted these sunset reviews to determine whether revocation of these antidumping duty orders would be likely to lead to continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews and the volume of imports of the subject merchandise for the period before and the period after the issuance of the antidumping duty order. In addition, section 752(c)(3) of the Act provides that the Department shall provide to the ITC the magnitude of the

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*People’s Republic of China and India; and Continuation of Countervailing Duty Order: Sulfanilic Acid From India*, 65 FR 37758 (June 16, 2000)).

<sup>9</sup> See *Initiation of Five-Year (“Sunset”) Reviews*, 70 FR 22632 (May 2, 2005).

<sup>10</sup> See *Sulfanilic Acid from India and the People’s Republic of China; Notice of Final Results of Expedited Sunset Reviews of Antidumping Duty Orders*, 70 FR 53164 (September 7, 2005) (“*Second Sunset Reviews*”).

<sup>11</sup> See *Sulfanilic Acid From China and India*, 71 FR 24860 (April 27, 2006) and USITC Pub. 3849, Investigation Nos. 701-TA-318 and 731-TA-538 and 561 (Second Review).

<sup>12</sup> See *Continuation of Antidumping and Countervailing Duty Orders: Sulfanilic Acid from the People’s Republic of China and India*, 71 FR 27449 (May 11, 2006).

<sup>13</sup> See *Initiation of Five-Year (“Sunset”) Review*, 76 FR 18163 (April 1, 2011).

margin of dumping likely to prevail if the order were revoked. Below we address the comments of the interested party.

## 1. Likelihood of Continuation or Recurrence of Dumping

### Interested Party Comments

NFC argues that revocation of these antidumping duty orders would likely lead to the recurrence of dumping. With respect to the PRC, NFC contends that imports have declined significantly since the issuance of the antidumping duty order.<sup>14</sup> NFC notes that the Department found dumping in the original investigation and subsequent administrative reviews.<sup>15</sup> With respect to India, NFC states that sulfanilic acid from India is still subject to the antidumping rate of 71.09 percent, established in the original investigation, which is well above the *de minimis* level. It further contends that imports ceased of sulfanilic acid since the issuance of the antidumping duty order.<sup>16</sup> According to NFC, the cessation of imports accompanied by the above *de minimis* levels is highly probative of the likelihood of the recurrence of dumping.<sup>17</sup>

**Department's Position:** Drawing on the guidance provided in the legislative history accompanying the Uruguay Round Agreements Act, specifically the Statement of Administrative Action, H.R. Doc. No. 103-316, vol. 1 (1994) ("SAA"), the House Report, H. Rep. No. 103-826, pt. 1 (1994), and the Senate Report, S. Rep. No. 103-412 (1994), the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping where: (a) dumping continued at any level above *de minimis* after the issuance of the order, (b) imports of the subject merchandise ceased after the issuance of the order, or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly. With respect to the antidumping duty order on sulfanilic acid from the PRC, the Department has conducted a number of reviews since the issuance of the order in which it found that dumping continued at levels above *de minimis*.<sup>18</sup>

In addition, pursuant to section 752(c)(1)(B) of the Act, the Department considered the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty orders. The Department notes that NFC states that the Indian imports ceased and Chinese imports declined significantly based on the former Harmonized Tariff Schedule of the United States subheadings for sulfanilic acid and sodium salts.<sup>19</sup> However, the subheadings for sulfanilic acid and sodium salts changed since the issuance of these antidumping duty orders, as discussed in the first sunset

<sup>14</sup> See letter from NFC, "Sulfanilic Acid from the People's Republic of China, Sunset Review No. A-570-815: NFC's Substantive Response," dated April 19, 2011 ("China Substantive Response") at 8-9.

<sup>15</sup> See China Substantive Response at 7.

<sup>16</sup> See letter from NFC, "Sulfanilic Acid from India, Sunset Review No. A-533-806: NFC's Substantive Response," dated April 29, 2011 ("India Substantive Response") at 8.

<sup>17</sup> See India Substantive Response at 7.

<sup>18</sup> See Attachment I of this memorandum.

<sup>19</sup> See India Substantive Response at 7.

review.<sup>20</sup> The subheadings for sulfanilic acid and sodium salts should be 2921.42.22 and 2921.42.24.20. Using statistics provided by the Global Trade Atlas® Online, the Department finds that imports of sulfanilic acid from India and the PRC have fluctuated since the issuance of the continuation of the orders.<sup>21</sup> For example, imports from the PRC fluctuated from 146,313 kilograms in 2006, to 21,000 kilograms in 2007, to 50 kilograms in 2009. There were no imports from the PRC of sulfanilic acid in 2008, 2010 and 2011.<sup>22</sup> However, imports from India increased from 0 kilograms in 2006 to 550 kilograms in 2008, and remained below 500 kilograms in 2009, 2010 and 2011.<sup>23</sup> Although the import volumes of sulfanilic acid have fluctuated, the existence of dumping margins above *de minimis* after the order is highly probative of the likelihood of continuation or recurrence of dumping.

If companies continue to dump with the discipline of an antidumping duty order in place, it is reasonable to assume that dumping would continue if the antidumping duty order were removed.<sup>24</sup> In this case, the Department found dumping at above *de minimis* levels in the original antidumping duty investigations against Chinese and Indian manufacturers and exporters. The cash deposit rates established in the original investigations remain in effect for Indian and Chinese imports, and there have been no administrative reviews of the antidumping duty order on Indian imports. Therefore, given the existence of dumping margins above *de minimis* levels, the Department determines that dumping would likely continue or recur if the antidumping duty orders were revoked.

## 2. Magnitude of the Margin Likely to Prevail

### Interested Party Comments

NFC states that the dumping margins from the original investigation are likely to prevail if the antidumping duty orders were revoked. Indeed, it argues that the dumping margin likely to prevail in the Indian sunset review is 71.09 percent because this rate was determined in the original investigation, and the Department conducted no administrative reviews.<sup>25</sup> Regarding sulfanilic acid from the PRC, NFC states that the dumping margin of 85.20 percent found in the investigation for most Chinese manufacturers and exporters should be the rate that the Department reports to the ITC because it represents the last level at which Chinese exporters shipped sulfanilic acid without an antidumping duty order in place.<sup>26</sup> Therefore, NFC requests that the Department report the margins from the original investigations to the ITC as the likely behavior of the Indian and Chinese manufacturers and exporters of sulfanilic acid if these antidumping duty orders were revoked.<sup>27</sup>

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<sup>20</sup> See *First Sunset Reviews*.

<sup>21</sup> See attachment II of this memorandum.

<sup>22</sup> *Id.*

<sup>23</sup> See attachment III of this memorandum.

<sup>24</sup> See SAA at 890.

<sup>25</sup> See India Substantive Response at 9.

<sup>26</sup> See China Substantive Response at 9.

<sup>27</sup> See the respective India and China Substantive Responses at 9.

**Department's Position:** The Department will provide to the ITC the company-specific margin from the investigation for each company that was investigated. For companies not investigated specifically, or for companies that did not begin shipping until after the order was issued, the Department normally will provide a margin based on the "all others" rate from the investigation. The Department's preference for selecting a margin from the investigation is based on the fact that it is the only calculated rate that reflects the behavior of exporters without the discipline of an order or suspension agreement in place. Under certain circumstances, however, the Department may select a more recently calculated margin to report to the ITC.

NFC requests that the Department report to the ITC the margins found in the investigations of sulfanilic acid from India and the PRC.<sup>28</sup> In the first and second sunset reviews, the Department reported to the ITC margins from the original investigations.<sup>29</sup> For the final results of these expedited third sunset reviews, the Department has again determined to report to the ITC the margins from the original investigations because these dumping margins are the only calculated rates that reflect the behavior of exporters without the discipline of an order and information from subsequent reviews of the order does not warrant the use of a more recently calculated dumping margin.<sup>30</sup> The Department notes that in the original investigation regarding Indian sulfanilic acid, the Department determined the dumping margin for all Indian manufacturers, producers, and exporters of the subject merchandise to be 114.80 percent and established an antidumping duty deposit rate of 71.09 percent after taking into account the 43.71 percent export subsidy rate.<sup>31</sup> Therefore, the Department will report to the ITC the margins from the original investigations as contained in the Final Results of Reviews section of this notice.

### Final Results of Reviews

We determine that revocation of the antidumping duty orders on sulfanilic acid from India and the PRC would be likely to lead to continuation or recurrence of dumping at the following weighted-average percentage margins:

<b>Manufacturers/Exporters/Producers</b>	<b>Weighted Average Margin (percent)</b>
<b>India</b>	
All Indian Manufacturers and Exporters	114.80 <sup>32</sup>

<sup>28</sup> *Id.*

<sup>29</sup> See *First Sunset Reviews and Second Sunset Reviews*.

<sup>30</sup> See Attachment I of this memorandum.

<sup>31</sup> See *Final Determination of Sales at Less than Fair Value: Sulfanilic Acid from India*, 58 FR 3251 (January 8, 1993).

<sup>32</sup> The Department published its final affirmative determination of sales at less than fair value with respect to imports of sulfanilic acid from India on January 8, 1993. See *Final Determination of Sales at Less Than Fair Value*, 58 FR 3251 (January 8, 1993). In this determination, the Department published a weighted-average dumping margin for all manufacturers/producers/exporters of 114.8 percent. However, consistent with section 772(d)(1)(D) of the Act, which prohibits assessing antidumping duties on the portion of the

Manufacturers/Exporters/Producers	Weighted Average Margin (percent)
<b>The PRC</b>	
China National Chemicals I&E Corporation, Hebei Branch	19.14
All Others	85.20

### Recommendation

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

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Ronald K. Lorentzen  
Deputy Assistant Secretary  
for Import Administration

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(Date)

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margin attributable to an export subsidy, we established an estimated antidumping duty deposit rate of 71.09 percent for duty deposit purposes. The Department issued its antidumping duty order on sulfanilic acid from India on March 2, 1993. *See Notice of Antidumping Duty Order; Sulfanilic Acid from India*, 58 FR 12025 (March 2, 1993). The Department has not conducted an administrative review of this order since its imposition.

**Attachment I**  
**Margin Rate History of Sulfanilic Acid since Second Sunset Review**

**India**

The Department did not conduct any administrative reviews regarding sulfanilic acid from India.

<b>Sulfanilic Acid from The People's Republic of China</b>		
<b>Federal Register Citation and Company</b>	<b>POR</b>	<b>Margin</b>
<b><i>Antidumping Duty Order: Sulfanilic Acid From the People's Republic of China, 57 FR 37524, (August 19, 1992)</i></b>		
China National Chemicals Import & Export Corporation, Hebei Branch (Sinochem Hebei)		19.14
All others		85.20
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results of Antidumping Duty Administrative Review, October 15, 1996 (61 FR 53711)</i></b>		
China National Chemical Construction Corporation	8/1/93-7/31/94	60.68
Hainan Garden Trading Company	8/1/93-7/31/94	67.05
Sinochem Hebei Import & Export Corporation	8/1/93-7/31/94	7.70
Yude Chemical Industry Company*	8/1/93-7/31/94	0.00
Zhenxing Chemical Industry Company	8/1/93-7/31/94	0.00
PRC Rate	8/1/93-7/31/94	85.20
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results and Partial Rescission of Antidumping Duty Administrative Review, October 15, 1996, (61 FR 53702)</i></b>		
Yude Chemical Industry Company	8/1/94-7/31/95	16.86
Zhenxing Chemical Industry Company	8/1/94-7/31/95	6.86
PRC Rate	8/1/94-7/31/95	85.20
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results of Antidumping Duty Administrative Review, September 16, 1997 (62 FR 48597)</i></b>		
Yude Chemical Industry Company.	8/1/95-7/31/96	0.00
Zhenxing Chemical Industry Company.	8/1/95-7/31/96	0.00
PRC Rate	8/1/95-7/31/96	85.20
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results of Antidumping Duty Administrative Review, November 17, 1998 (63 FR 63834)</i></b>		
Yude Chemical Industry, Co./Zhenxing Chemical Industry, Co.	8/1/96-7/31/97	0.29

<b>Sulfanilic Acid from The People's Republic of China</b>		
<b>Federal Register Citation and Company</b>	<b>POR</b>	<b>Margin</b>
PRC Rate	8/1/96-7/31/97	85.20
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results of Antidumping Duty Administrative Review, 65 FR 13366 (March 13, 2000)</i></b>		
Yude (Yude/Xinyu) Chemical Industry, Co. and Zhenxing (Zhenxing/Mancheng) Chemical	8/1/97-7/31/98	18.75
<b><i>Sulfanilic Acid From the People's Republic of China: Final Results of Antidumping Duty Administrative Review, 66 FR 15837 (March 21, 2001)</i></b>		
All firms who do not have a separate rate including Yude and Zhenxing	8/1/98-7/31/98	85.20
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results and Final Partial Rescission of Antidumping Duty Administrative Review, 67 FR 1962 (January 15, 2002)</i></b>		
Zhenxing	8/1/99-7/31/00	54.40
<b><i>Sulfanilic Acid From the People's Republic of China; Final Results and Partial Rescission of Antidumping Duty Administrative Review, 67 FR 70404 (November 22, 2002)</i></b>		
Zhenxing	8/1/00-7/31/01	64.22

## Attachment II

## Imports of Sulfanilic Acid into the United States from the People's Republic of China

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1990		1991		1992	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	1,097,194	424,400	3,019,488	1,305,001	1,868,781	882,634
29214210	KG	N,N-Dimethylaniline	62,053	15,500	0	0	0	0
29214220	KG	O-Aminobenzenesulfonic Acid (Orthanilic Acid) Etc	1,847	500	64,400	15,507	146,866	31,073
29214224	KG	Metanilic Acid; And Sulfanilic Acid	0	0	493,311	411,544	641,981	516,100
29214225	KG	Fast Color Bases Of Aniline Deriv Or Their Salts	135,476	22,000	169,227	29,950	72,750	12,046
29214230	KG	Aniline Deriv Etc Of Prod In Us Note3 To Sect 6	4,777	1,500	27,074	9,000	91,707	30,000
29214250	KG	Aniline Deriv Etc (Exc Prod In Us Nt 3 To Sec 6)	893,041	384,900	969,103	353,000	0	0
29214260	KG	Aniline Deriv Etc (Exc Prod In Us Nt 3 To Sec 6)	0	0	304,378	126,000	0	0
29214270	KG	Aniline Derivatives And Their Salts	0	0	991,995	360,000	738,288	217,300
29214275	KG	Aniline Derivatives And Their Salts	0	0	0	0	177,189	76,115

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1993		1994		1995	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	2,395,472	1,456,351	3,611,013	2,400,452	3,912,685	2,492,450
29214210	KG	N,N-Dimethylaniline	0	0	37,193	54,000	0	0
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	175,301	67,100	98,516	43,380	66,197	20,360
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	0	0	0	0	212,644	55,500
29214220	KG	O-Aminobenzenesulfonic Acid (Orthanilic Acid) Etc	212,672	79,250	300,932	86,378	0	0
29214222	KG	Sulfanilic Acid	392,061	340,000	1,430,662	1,615,700	1,578,834	1,677,130
29214223	KG	3,4-Dichloroaniline	0	0	0	0	3,845	500
29214225	KG	Fast Color Bases Of Aniline Deriv Or Their Salts	366,090	55,401	945,997	177,196	0	0
29214228	KG	Sulfanilic Acid	840,182	731,680	0	0	0	0
29214230	KG	Aniline Deriv Etc Of Prod In Us Note3 To Sect 6	71,220	20,100	128,337	50,418	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	0	0	0	0	256,188	145,432
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	0	0	0	0	154,360	20,782
29214265	KG	Aniline Derivatives And Their Salts Of Products In	0	0	0	0	432,470	157,794
29214275	KG	Aniline Derivatives And Their Salts	337,946	162,820	669,376	373,380	0	0
29214290	KG	Other Aniline Derivatives And Their Salts	0	0	0	0	1,208,147	414,952

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1996		1997		1998	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	3,739,976	1,311,636	4,480,358	1,296,386	5,380,269	2,131,140
29214210	KG	N,N-Dimethylaniline	0	0	0	0	4,830	2,960
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	1,710	500	36,598	12,000	10,204	6,160
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	219,847	52,841	524,551	97,775	251,321	59,485
29214222	KG	Sulfanilic Acid	397,431	389,500	290,740	211,790	486,490	581,340
29214223	KG	3,4-Dichloroaniline	94,394	16,475	0	0	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	588,289	189,584	663,496	254,715	630,808	302,170
29214265	KG	Aniline Derivatives And Their Salts Of Products In	422,879	109,050	415,735	141,360	1,306,321	375,911
29214290	KG	Other Aniline Derivatives And Their Salts	2,015,426	553,686	2,549,238	578,746	2,690,295	803,114

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1999		2000		2001	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	5,454,876	3,113,518	3,943,729	2,256,824	1,849,503	731,863
29214210	KG	N,N-Dimethylaniline	3,440	20	0	0	23,393	16,300
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	40,597	27,620	0	0	24,856	14,940
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	132,205	35,812	65,689	16,762	136,510	33,225
29214222	KG	Sulfanilic Acid	1,249,230	1,586,909	856,515	1,122,675	0	0
29214223	KG	3,4-Dichloroaniline	4,650	31	0	0	8,667	425
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	844,257	469,390	381,770	207,305	16,734	3,580
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	0	0	140,502	75,596	94,360	56,000
29214265	KG	Aniline Derivatives And Their Salts Of Products In	1,526,485	471,199	892,223	285,082	274,301	93,737
29214290	KG	Other Aniline Derivatives And Their Salts	1,654,012	522,537	1,607,030	549,404	1,270,682	513,656

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	2002		2003		2004	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	3,018,421	1,329,058	3,220,237	1,663,212	4,361,215	2,445,022
29214210	KG	N,N-Dimethylaniline	44,601	30,800	4,247	200	0	0
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	0	0	27,408	14,840	0	0
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	34,105	10,011	89,782	47,080	206,802	107,421
29214222	KG	Sulfanilic Acid	0	0	160,189	202,674	89,185	108,550
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	130,838	29,369	179,899	29,546	58,778	10,256
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	104,044	41,000	0	0	0	0
29214265	KG	Aniline Derivatives And Their Salts Of Products In	384,579	169,034	245,434	79,157	604,695	282,847
29214290	KG	Other Aniline Derivatives And Their Salts	2,320,254	1,048,844	2,513,278	1,289,715	3,401,755	1,935,948

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	2005		2006		2007	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	7,744,286	3,639,323	8,795,574	3,511,858	10,178,914	3,477,765
29214210	KG	N,N-Dimethylaniline	92,548	35,638	33,935	18,850	781,121	21,095
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	80,751	16,320	697,992	141,710	570,878	134,120
29214216	KG	2,4,5-Trichloroaniline	24,000	27	0	0	0	0
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	332,978	79,223	873,175	124,304	377,818	116,389
29214222	KG	Sulfanilic Acid	7,765	1,549	337,226	146,313	26,880	21,000
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	106,787	32,602	77,642	20,555	143,970	19,750
29214265	KG	Aniline Derivatives And Their Salts Of Products In	1,039,156	582,147	2,070,225	669,745	3,311,546	724,087
29214290	KG	Other Aniline Derivatives And Their Salts	6,060,301	2,891,817	4,705,379	2,390,381	4,966,701	2,441,324

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	2008		2009		2010	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	17,670,197	3,637,547	9,752,314	1,834,072	13,927,792	3,319,037
29214210	KG	N,N-Dimethylaniline	3,753,872	201,989	1,583,962	87,220	4,006,328	297,620
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	421,125	78,580	646,640	122,660	575,118	113,160
29214216	KG	2,4,5-Trichloroaniline	17,149	507	0	0	0	0
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	584,496	153,532	420,615	83,706	467,469	131,289
29214222	KG	Sulfanilic Acid	0	0	2,025	50	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	142,802	28,580	119,101	16,599	54,576	14,260
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	0	0	3,060	180	10,467	5,995
29214265	KG	Aniline Derivatives And Their Salts Of Products In	6,624,444	889,811	4,632,425	451,988	4,055,391	1,028,127
29214290	KG	Other Aniline Derivatives And Their Salts	6,126,309	2,284,548	2,344,486	1,071,669	4,758,443	1,728,586

United States (HS 8) Import Statistics From China								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - April								
Commodity	Unit	Description	2009		2010		2011	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	4,516,129	541,864	4,130,527	1,040,076	5,221,191	1,005,343
29214210	KG	N,N-Dimethylaniline	782,167	40,000	991,832	77,620	1,664,261	121,500
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	182,204	32,640	297,137	60,280	130,865	21,130
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	118,511	33,150	115,635	30,311	236,001	64,434
29214222	KG	Sulfanilic Acid	2,025	50	0	0	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	36,874	1,349	0	0	143,453	29,850
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	0	0	3,775	3,995	23,888	9,000
29214265	KG	Aniline Derivatives And Their Salts Of Products In	2,582,055	138,042	1,272,586	377,637	1,359,929	408,826
29214290	KG	Other Aniline Derivatives And Their Salts	812,293	296,633	1,449,562	490,233	1,662,794	350,603

## Attachment III

## Imports of Sulfanilic Acid into the United States from India

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1990		1991		1992	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	1,976,262	571,624	1,596,367	491,323	1,874,480	687,614
29214210	KG	N,N-Dimethylaniline	106,487	39,830	277,689	91,012	338,840	91,458
29214220	KG	0-Aminobenzenesulfonic Acid (Orthanilic Acid) Etc	28,791	8,750	99,758	32,110	277,706	61,651
29214223	KG	3,4-Dichloroaniline	0	0	13,707	4,050	0	0
29214224	KG	Metanilic Acid; And Sulfanilic Acid	0	0	402,711	212,000	668,606	411,745
29214225	KG	Fast Color Bases Of Aniline Deriv Or Their Salts	473,218	59,963	619,290	75,350	460,728	80,601
29214230	KG	Aniline Deriv Etc Of Prod In Us Note3 To Sect 6	0	0	0	0	40,310	3,426
29214250	KG	Aniline Deriv Etc (Exc Prod In Us Nt 3 To Sec 6)	1,367,766	463,081	51,865	31,424	0	0
29214260	KG	Aniline Deriv Etc (Exc Prod In Us Nt 3 To Sec 6)	0	0	21,780	10,000	0	0
29214270	KG	Aniline Derivatives And Their Salts	0	0	109,567	35,377	80,497	37,383
29214275	KG	Aniline Derivatives And Their Salts	0	0	0	0	7,793	1,350

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1993		1994		1995	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	1,933,130	879,265	2,852,951	1,222,050	3,835,288	1,429,095
29214210	KG	N,N-Dimethylaniline	0	0	0	0	95,150	12,300
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	58,460	19,548	28,269	10,042	64,517	47,740
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	0	0	0	0	222,742	76,200
29214220	KG	O-Aminobenzenesulfonic Acid (Orthanilic Acid) Etc	102,085	26,183	47,952	15,900	0	0
29214221	KG	Metanilic Acid	403,074	290,000	651,369	444,944	560,692	344,515
29214222	KG	Sulfanilic Acid	0	0	8,362	19,958	0	0
29214225	KG	Fast Color Bases Of Aniline Deriv Or Their Salts	473,222	121,460	1,217,494	360,090	0	0
29214226	KG	Metanilic Acid	209,707	153,000	0	0	0	0
29214228	KG	Sulfanilic Acid	12,000	3,000	0	0	0	0
29214230	KG	Aniline Deriv Etc Of Prod In Us Note3 To Sect 6	83,080	15,033	107,818	20,342	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	0	0	0	0	1,430,494	442,594
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	0	0	0	0	769,612	280,430
29214265	KG	Aniline Derivatives And Their Salts Of Products In	0	0	0	0	305,485	68,839
29214275	KG	Aniline Derivatives And Their Salts	591,502	251,041	791,687	350,774	0	0
29214290	KG	Other Aniline Derivatives And Their Salts	0	0	0	0	386,596	156,477

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1996		1997		1998	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	2,966,714	1,204,543	3,208,306	1,201,151	2,632,794	1,084,290
29214210	KG	N,N-Dimethylaniline	57,971	22,905	73,474	8,000	33,476	13,800
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	7,767	3,230	37,008	18,189	13,844	5,320
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	202,662	74,350	61,318	23,700	89,751	37,112
29214221	KG	Metanilic Acid	414,875	284,153	761,774	463,729	377,966	293,075
29214222	KG	Sulfanilic Acid	24,087	36,000	0	0	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	653,404	271,134	797,978	283,815	1,004,563	330,901
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	593,183	240,000	290,271	124,758	300,752	149,320
29214265	KG	Aniline Derivatives And Their Salts Of Products In	332,469	67,287	454,273	50,049	80,615	14,775
29214290	KG	Other Aniline Derivatives And Their Salts	680,296	205,484	732,210	228,911	731,827	239,987

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	1999		2000		2001	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	1,959,192	1,011,084	2,465,725	1,373,335	4,118,510	1,372,473
29214210	KG	N,N-Dimethylaniline	133,682	60,150	163,048	116,628	214,467	144,183
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	0	0	190,033	163,220	261,679	114,445
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	128,050	60,032	38,614	14,400	36,345	22,050
29214221	KG	Metanilic Acid	229,855	245,945	453,659	399,965	110,529	98,890
29214223	KG	3,4-Dichloroaniline	46,297	15,890	109,521	39,000	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	564,909	208,731	439,630	186,924	2,293,541	499,426
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	157,723	91,261	374,053	205,520	36,413	22,300
29214265	KG	Aniline Derivatives And Their Salts Of Products In	109,062	33,700	70,342	19,312	185,355	68,660
29214290	KG	Other Aniline Derivatives And Their Salts	589,614	295,375	626,825	228,366	980,181	402,519

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	2005		2006		2007	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	8,920,538	4,533,364	8,708,623	4,043,920	11,816,633	4,483,564
29214210	KG	N,N-Dimethylaniline	689,627	326,497	874,135	431,792	1,015,878	472,390
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	991,147	655,161	495,504	195,891	466,745	174,304
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	111,975	18,915	307,775	68,900	454,922	81,647
29214221	KG	Metanilic Acid	131,238	75,030	107,319	60,250	128,904	66,796
29214223	KG	3,4-Dichloroaniline	0	0	0	0	23,275	10,000
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	339,723	81,465	298,239	65,098	150,345	44,080
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	207,265	110,810	304,311	172,815	413,472	227,497
29214265	KG	Aniline Derivatives And Their Salts Of Products In	907,038	270,328	993,526	87,116	1,336,406	82,150
29214290	KG	Other Aniline Derivatives And Their Salts	5,542,525	2,995,158	5,327,814	2,962,058	7,826,686	3,324,700

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - December								
Commodity	Unit	Description	2008		2009		2010	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	13,532,770	4,086,333	8,937,018	3,423,457	9,682,911	3,724,042
29214210	KG	N,N-Dimethylaniline	823,498	353,840	431,552	225,280	1,016,068	496,000
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	834,821	294,680	537,466	189,600	974,285	352,600
29214216	KG	2,4,5-Trichloroaniline	37,946	16,000	0	0	0	0
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	266,717	39,000	699,293	82,050	412,572	69,590
29214221	KG	Metanilic Acid	94,668	34,829	39,959	22,200	144,073	33,307
29214222	KG	Sulfanilic Acid	11,407	550	9,600	300	3,600	100
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	63,982	19,540	182,638	31,064	99,104	20,510
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	101,172	43,750	49,777	5,600	12,804	5,358
29214265	KG	Aniline Derivatives And Their Salts Of Products In	198,564	50,005	408,419	51,308	170,638	34,526
29214290	KG	Other Aniline Derivatives And Their Salts	11,099,995	3,234,139	6,578,314	2,816,055	6,849,767	2,712,051

United States (HS 8) Import Statistics From India								
Commodity: 292142, Aniline Derivatives And Their Salts								
Year To Date: January - April								
Commodity	Unit	Description	2009		2010		2011	
			USD	Quantity	USD	Quantity	USD	Quantity
292142	KG	Aniline Derivatives And Their Salts	2,814,369	936,706	3,325,856	1,214,838	2,977,644	1,076,380
29214210	KG	N,N-Dimethylaniline	100,660	49,280	521,908	252,000	169,990	80,000
29214215	KG	N-Ethylaniline And N,N-Diethylaniline	203,086	68,800	472,613	168,600	206,332	77,600
29214218	KG	O-Aminobenzenesulfonic Acid; 6-Chlorometanilic Acid	528,341	61,650	241,620	49,190	302,196	41,075
29214221	KG	Metanilic Acid	0	0	70,906	5,625	38,474	16,200
29214222	KG	Sulfanilic Acid	6,000	200	3,600	100	0	0
29214236	KG	4,4-Benzidine-2-2'Disulfonic Acid; M-Chloroaniline;	45,369	7,766	20,401	5,000	19,623	4,005
29214255	KG	Fast Color Bases Of Aniline Derivatives And Their	49,777	5,600	12,804	5,358	0	0
29214265	KG	Aniline Derivatives And Their Salts Of Products In	90,385	23,820	61,380	12,015	0	0
29214290	KG	Other Aniline Derivatives And Their Salts	1,790,751	719,590	1,920,624	716,950	2,241,029	857,500