
New Trade Case on Imports of Thermal Paper from Germany, Japan, Korea, and Spain

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A new U.S. antidumping (“AD”) duty petition was filed on September 30, 2020, by Appvion Operations, Inc. and Domtar Corporation against imports of thermal paper from Germany, Japan, Korea, and Spain.

The merchandise covered by this petition is thermal paper. Thermal paper is paper coated with a mixture of dye and developer that react and form an image on the paper when heat is applied. The scope of these investigations includes thermal paper of all basis weights and calipers. Such paper is typically (but not exclusively) used in point-of-sale applications, such as ATM receipts, credit card receipts, gas pump receipts, labels, tickets, and tags. For a full description of the scope of the petition, please see the Scope section below.

The petition includes AD (less than fair value) allegations against Germany, Japan, Korea, and Spain. The Department of Commerce (“DOC”) and the International Trade Commission (“ITC”) will conduct the investigations. Within the next 45 days, the ITC will determine if there is a reasonable indication that the imports are injuring the U.S. industry. If the ITC finds that standard is met, then the cases will move to the DOC which will calculate the preliminary AD duty margins.

The DOC’s preliminary determinations are currently scheduled for March 16, 2021(AD), which is the date when importers will be required to deposit the calculated duties upon the products’ entry in the U.S. market.

There are strict statutory deadlines associated with these proceedings and affected companies are advised to prepare as soon as possible. If this product is of interest to you, please let us know so that we can provide you with additional information as it becomes available.

The following are key facts about this trade case:

Petitioners: Appvion Operations, Inc. and Domtar Corporation

Foreign Producers/Exporters and US Importers: Please contact us for a listing of individual companies named in the petition.

AD margins: Petitioners have alleged the following AD margins:

- Germany: a calculated AD margin of 7.66 percent ad valorem;
- Japan: calculated AD margins ranging from 104.66 to 113.91 percent ad valorem;
- Korea: calculated AD margins ranging from 48.42 to 49.98 ad valorem; and
- Spain: calculated AD margins ranging from 30.76 to 39.41 percent ad valorem.

Merchandise covered by the scope of the case:

The scope of these investigations covers thermal paper in the form of “jumbo rolls” and certain “converted rolls.” Jumbo rolls are defined as rolls with a nominal width of 4.5 inches or more, a nominal weight of 65 pounds or more, and a nominal diameter of 20 inches or more (“jumbo rolls”). All jumbo rolls are included in the scope regardless of the basis weight of the paper. Also included in the scope are “converted rolls” with a width of less than 4.5 inches, and with a basis weight of 70 grams per square meter (“gsm”) or less. The scope covers jumbo rolls and converted rolls of thermal paper with or without a base coat (typically made of clay and/or latex, and/or like materials) on one or both sides; with thermal active coating(s) (typically made of sensitizer, dye, and co-reactant, and/or like materials) on one or both sides; with or without a top coat (typically made of pigments, polyvinyl alcohol, and/or like materials).

The scope of these investigations covers imports of converted rolls from third countries that are manufactured from jumbo rolls produced in the subject countries.

The merchandise subject to these investigations may be classified in the Harmonized Tariff Schedule of the United States (“HTSUS”) under subheadings 4811.90.8030 for jumbo rolls and HTSUS 4811.90.9030 for converted rolls. Although HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.

If you have any questions regarding the content of this alert, please contact Mark Ludwikowski (mludwikowski@clarkhill.com; 202-640-6680), Kevin Williams (kwilliams@clarkhill.com; 312-985-5907); William Sjoberg (wsjoberg@clarkhill.com; 202-772-0924), Courtney Gayle Taylor (cgtaylor@clarkhill.com; 202-552-2350); Dennis Devaney (ddevaney@clarkhill.com); or another member of Clark Hill’s International Trade Business Unit.