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

A-489-860
Investigation
Public Version
E&C/TRCI: Team

October 19, 2026

ENFORCEMENT AND COMPLIANCE
TRADE REMEDY COUNSELING AND INITIATIONS
ANTIDUMPING DUTY INVESTIGATION INITIATION CHECKLIST

SUBJECT: Certain Corrugated Die-Cut Cardboard Boxes from the Republic of Türkiye
CASE NUMBER: A-489-660

THE PETITIONERS:

American Pizza Boxes Manufacturers Coalition[1]

United Steel, Paper and Forestry, Rubber,
Manufacturing, Energy, Allied Industrial
and Service Workers International Union
60 Blvd. of the Allies
Rm. 807
Pittsburgh, PA 15222
(412) 400-8716

LEAD COUNSEL TO THE PETITIONERS:

Robert E. DeFrancesco
Wiley Rein, LLP
2050 M Street, NW
Washington, DC 20036
(202) 719-7000

SCOPE: *See* Attachment I – Scope of the Investigation, to this checklist.

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[1] The petitioners are the American Pizza Boxes Manufacturers Coalition (the Coalition) and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union. The members of the Coalition are Smurfit Westrock plc and Pratt Industries, Inc. For contact information for the members of the Coalition, *see* Petitioners' letter, "Petitions for the Imposition of Antidumping and Countervailing Duties," dated September 9, 2026 (Petition) at Volume I (page 4).

Filed By: Natalie Jersa, Filed Date: 10/22/26 11:32 AM, Submission Status: Approved

INTERNATIONAL TRADE ADMINISTRATION

APPROXIMATE CASE CALENDAR:

On September 29, 2026, Commerce extended the initiation deadline by 20 days to further examine industry support in accordance with sections 732(c)(1)(B) and 732(c)(4)(D) of the Tariff Act of 1930, as amended (the Act), because it was "not clear from the Petitions whether the industry support criteria have been met…."[2] All other deadlines have been adjusted accordingly.

Event	Date of Action	Day of Week
	Antidumping Duty Investigation	
Petition Filed	September 9, 2026	Wednesday
Initiation Date	October 19, 2026	Monday
ITC Preliminary Determination	October 26, 2026	Monday*
ITA Preliminary Determination†**	March 8, 2027	Monday
ITA Final Determination†	May 24, 2027	Monday*
ITC Final Determination***	July 8, 2027	Thursday
Publication of Order****	July 15, 2027	Thursday

*Where the deadline falls on a weekend, the appropriate date is the next business day.
† These deadlines may be extended under the governing statute.
** This will take place only in the event of a preliminary affirmative determination from the U.S. International Trade Commission (ITC).
*** This will take place only in the event of a final affirmative determination from the International Trade Administration (ITA).
**** This will take place only in the event of a final affirmative determination from the ITA and the ITC.
Note: The ITC final determination will take place no later than 45 days after a final affirmative ITA determination.
Note: Publication of order will take place approximately seven days after an affirmative ITC final determination.

INDUSTRY SUPPORT:

Does the Petition identify the <u>entire</u> domestic industry, including the names, addresses, and phone numbers of the petitioners and all domestic producers known to the petitioners?

☒	Yes
☐	No

[2] *See Notice of Extension of the Deadline for Determining the Adequacy of the Antidumping and Countervailing Duty Petitions: Certain Corrugated Die-Cut Cardboard Boxes from the People's Republic of China, Malaysia, and the Republic of Türkiye*, 91 FR 62690 (October 2, 2026).

Does the Petition contain information relating to the degree of industry support for the Petition, including:

The total volume or value of U.S. production of the domestic like product for the most recently completed calendar year?

☒	Yes
☐	No

The volume or value of the domestic like product produced by the petitioners and each domestic producer identified for the most recently completed calendar year?

☒	Yes
☐	No

Do the petitioners and those expressing support for the Petition account for more than 50% of production of the domestic like product?

☒	Yes
☐	No

If No, do those expressing support account for the majority of those expressing an opinion and at least 25% of domestic production?

☐	Yes
☐	No
☒	Not Applicable

Was there opposition to the Petition from any producers or workers engaged in the production of the domestic like product?

☐	Yes
☒	No

Are any of the parties who have expressed opposition to the Petition either importers or domestic producers affiliated with foreign producers?

☐	Yes
☐	No
☒	Not Applicable

For a detailed analysis of industry support, s*ee* Attachment II, Analysis of Industry Support for the Antidumping and Countervailing Duty Petitions Covering Certain Corrugated Die-Cut

Cardboard Boxes from the People's Republic of China, Malaysia, and the Republic of Türkiye, to this checklist.

INJURY ALLEGATION:

The ITC's notice of institution of antidumping and countervailing duty investigations was published in the *Federal Register* on September 14, 2026.[3] The notice indicates that the ITC instituted investigations to determine whether there is a reasonable indication that the domestic industry producing certain corrugated die-cut cardboard boxes (corrugated die-cut boxes) is materially injured, or threatened with material injury, by reason of imports of corrugated die-cut boxes from the Republic of Türkiye (Türkiye).[4]

For analysis of the injury allegation and information relevant to material injury, threat of material injury, or material retardation, and causation, including information on the volume of imports, the effect of these imports on prices in the U.S. market, and the consequent impact of imports on the domestic industry, *see* Attachment III, Analysis of Allegations and Evidence of Material Injury and Causation for the Antidumping and Countervailing Duty Petitions Covering Certain Corrugated Die-Cut Cardboard Boxes from the People's Republic of China, Malaysia, and the Republic of Türkiye, to this checklist.

PETITION REQUIREMENTS:

Does the Petition contain the following?

☒ a clear and detailed description of the merchandise to be investigated, including the appropriate Harmonized Tariff Schedule of the United States (HTSUS) subheadings (*see* Petition at Volume I at 10-20 and Exhibits I-1 and I-9 through I-14, First General Issues Supplement[5] at 2-7 and Exhibits I-Supp-2 through I-Supp-4, Second General Issues Supplement[6] at 1-16 and Exhibits I-Supp2-2 through I-Supp2-4, and Third General Issues Supplement[7] at 1-5 and Exhibits I-Supp3-1 through I-Supp3-4).

☒ the name of each country in which the merchandise originates or from which the merchandise is exported (*see* Petition at Volume I at 20).

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[3] *See Corrugated Pizza Boxes from China, Malaysia, and Turkey; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Investigations*, 91 FR 58174 (September 14, 2026).
[4] *Id.*
[5] *See* Petitioners' Letter, "Petitioners' Response to the 1st Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition" dated September 21, 2026 (First General Issues Supplement).
[6] *See* Petitioners' Letter, "Petitioners' Response to the 2nd Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated September 28, 2026 (Second General Issues Supplement).
[7] *See* Petitioners' Letter, "Petitioners' Response to the 3rd Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated October 6, 2026 (Third General Issues Supplement).

☒ the identity of each known exporter, foreign producer, and importer of the merchandise (*see* Petition at Volume I at 20 and 24 and Exhibits I-15 and I-16; *see also* First General Issues Supplement at 1-2 and Exhibit I-Supp-1).

☒ import volume and value information for the most recent two-year period (*see* Petition at Volume I at 22-23 and Exhibit I-1).

☒ a statement indicating that the Petition was filed simultaneously with the U.S. Department of Commerce (Commerce) and the ITC (*see* cover letter to the Petition at 1-2).

☒ an adequate summary of the proprietary data (*see* public versions of the Petition, First General Issues Supplement, Second General Issues Supplement, First Türkiye AD Supplement,[8] Second Türkiye AD Supplement,[9] Third Türkiye AD Supplement,[10] and Fourth Türkiye AD Supplement).[11]

☒ a statement regarding release under administrative protective order (*see* the cover letters to the Petition at 1 and 3, First General Issues Supplement at 1-2, Second General Issues Supplement at 1-2, First Türkiye AD Supplement at 1-2, Second Türkiye AD Supplement at 1-2, Third Türkiye AD Supplement at 1-2, and Fourth Türkiye AD Supplement at 1-2).

☒ a certification of the facts contained in the Petition by an official of the petitioning firms and their legal representative (if applicable) (*see* attachments to the cover letters to the Petition, First General Issues Supplement, Second General Issues Supplement, Third General Issues Supplement, First Türkiye AD Supplement, Second Türkiye AD Supplement, Third Türkiye AD Supplement, and Fourth Türkiye AD Supplement).

LESS THAN FAIR VALUE ALLEGATION:

The Petition was officially filed on September 9, 2026. Between September 11 and October 9, 2026, Commerce issued supplemental questionnaires to the petitioners with respect to the less than fair value allegation. Between September 15 and October 12, 2026, the petitioners responded to Commerce's requests for information (First Türkiye AD Supplement, Second Türkiye AD Supplement, Third Türkiye AD Supplement, and Fourth Türkiye AD Supplement).

[8] *See* Petitioners' Letter, "Petitioner Response to the 1st Supplemental Questionnaire Regarding Türkiye Volume IV of the Petition," dated September 15, 2026 (First Türkiye AD Supplement).
[9] *See* Petitioners' Letter, "Petitioner Response to the 2nd Supplemental Questionnaire Regarding Türkiye Volume IV of the Petition," dated September 22, 2026 (Second Türkiye AD Supplement).
[10] *See* Petitioners' Letter, "Petitioners' Response to the 3rd Supplemental Questionnaire Regarding Republic of Türkiye Volume IV of the Petition," dated September 25, 2026 (Third Türkiye AD Supplement).
[11] *See* Petitioners' Letter, "Petitioner Response to the 4th Supplemental Questionnaire Regarding Turkey AD Volume IV of the Petition," dated October 12, 2026 (Fourth Türkiye AD Supplement).

In accordance with 19 CFR 351.204(b)(1), because the Petition was filed on September 9, 2026, the appropriate period of investigation (POI) is July 1, 2025, through June 30, 2026.

U.S. Price

Information relevant to the U.S. price calculations can be found in Volume IV of the Petition at 2-10 and Exhibits IV-1 through IV-12, First Türkiye AD Supplement at 3-6 and Exhibits IV-Supp-1 and IV-Supp-2, Second Türkiye AD Supplement at 1-2 and Exhibit IV-Supp2-1, and Fourth Türkiye AD Supplement at 1-3 and Exhibits IV-Supp4-1 through IV-Supp4-5.

The petitioners based export price on the average unit value (AUV) derived from official import data for imports of corrugated die-cut boxes from Türkiye entered into the United States during the POI under HTSUS subheading 4819.10.0020. As the AUV is based on customs value, the petitioners made adjustments for foreign inland freight and foreign brokerage and handling. The petitioners also based export price on price offers for corrugated die-cut boxes produced in Türkiye and offered for sale in the U.S. market during the proposed POI. The petitioners made certain adjustments to price to calculate an ex-factory U.S. price in accordance with section 772 of the Act. We examined the information provided by the petitioners and made no additional adjustments. The final net U.S. prices are $[ ]/kg, $[ ]/case, and $[ ]/case.[12]

Does the Petition contain the following?

☒ supporting documentation for the alleged prices and any adjustments to the prices (*see* Petition at Volume IV at 2-10 and Exhibits IV-I through IV-12; *see also* First Türkiye AD Supplement at 3-6 and Exhibits IV-Supp-1 and IV-Supp-2, Second Türkiye AD Supplement at 1-2 and Exhibit IV-Supp2-1, and Fourth Türkiye AD Supplement at 1-3 and Exhibits IV-Supp4-1 through IV-Supp4-5).

☒ current prices (and adjustments to the prices, if applicable) (*see* Petition at Volume IV at 2-10 and Exhibits IV-I through IV-12; *see also* First Türkiye AD Supplement at 3-6 and Exhibits IV-Supp-1 and IV-Supp-2, Second Türkiye AD Supplement at 1-2 and Exhibit IV-Supp2-1, and Fourth Türkiye AD Supplement at 1-3 and Exhibits IV-Supp4-1 through IV-Supp4-5).

N/A conversion factors for comparisons of differing units of measure.

Normal Value

Information relevant to the normal value (NV) calculations can be found in Volume IV of the Petition at 10, First Türkiye AD Supplement at 6-7 and Exhibits IV-Supp-4 through IV-Supp-6, and Third Türkiye AD Supplement at 1 and Exhibit IV-Supp3-1.

The petitioners based NV on home market price quotes for corrugated die-cut boxes which had the [ ]. As the home market prices were offered on an [ ] basis, the petitioners made no additional

[12] *See* Fourth Türkiye AD Supplement at Exhibit IV-Supp4-5.

adjustments to calculate an [ ] home market price in accordance with section 773 of the Tariff Act of 1930, as amended (the Act). We examined the information provided by the petitioners and made no additional adjustments. The final net home market prices are $[ ]/unit and $[ ]/unit.[13]

Does the Petition contain the following?

☒ supporting documentation for the alleged prices and any adjustments to the prices (*see* Petition at Volume IV at 10; *see also* First Türkiye AD Supplement at 6-7 and Exhibits IV-Supp-4 through IV-Supp-6, and Third Türkiye AD Supplement at 1 and Exhibit IV-Supp3-1).

☒ current prices (and adjustments to the prices, if applicable) (*see* Petition at Volume IV at 10; *see also* First Türkiye AD Supplement at 6-7 and Exhibits IV-Supp-4 through IV-Supp-6, and Third Türkiye AD Supplement at 1 and Exhibit IV-Supp3-1).

☒ correct currency rates used for all conversions to U.S. dollars (*see* Petition at Exhibit IV-15; *see also* First Türkiye AD Supplement at Exhibit IV-Supp-6).

N/A conversion factors for comparisons of differing units of measure.

The petitioners provided information demonstrating that sales of corrugated die-cut boxes in Türkiye were made at prices below the cost of production (COP), within the meaning of section 773(b) of the Act.[14] Consequently, the petitioners, pursuant to section 773(a)(4) of the Act, relied on constructed value (CV) as the basis for NV. Information relevant to the CV calculations can be found on Volume IV of the Petition at 11-19 and Exhibits IV-13 through IV-24, First Türkiye AD Supplement at 7-11 and Exhibits IV-Supp-6 through IV-Supp-14, and Third Türkiye AD Supplement at 1-2 and Exhibits IV-Supp3-2 through IV-Supp3-4. The petitioners provided data that are contemporaneous with the POI and, where appropriate, adjusted for inflation. We examined the information provided by the petitioners and made no additional adjustments. The final CVs are $[ ]/case and $[ ]/case.[15]

COP and CV	Source	Satisfactory
Raw Material:	U.S. Producer's Input and Usage Rates Türkiye Import Statistics from Trade Data Monitor	Yes
Labor:	U.S. Producer's Labor Usage Turkish Labor Rates from Eurostat	Yes

[13] *See* First Türkiye AD Supplement at Exhibit IV-Supp-5.
[14] *Id.* at 7 and Exhibit IV-Supp-5.
[15] *See* Third Türkiye AD Supplement at Exhibits IV-Supp3-4.

Energy: (electricity, natural gas, and water)	U.S. Producer's Electricity, Natural Gas, and Water Rates Electricity and Natural Gas Rates from Eurostat Water Rates from the Presidency of the Republic of Türkiye Investment Office	Yes
Overhead:	Barem Ambalaj Sanayi ve Ticaret Anonim Şirketi ve Bağlı Ortaklıkları's (Barem) Financial Statements for FY 2025	Yes
SG&A Expenses:	Barem's Financial Statements for FY 2025	Yes
Interest Expenses:	Barem's Financial Statements for FY 2025	Yes
Profit:	Barem's Financial Statements for FY 2025	Yes

ESTIMATED MARGINS:

The petitioners provided dumping margins based on price-to-CV comparisons. The estimated dumping margins range from 51.27 to 92.81 percent.[16]

RECOMMENDATION:

We examined the accuracy and adequacy of the evidence provided in the Petition as discussed in this checklist and attachments and recommend determining that the evidence is sufficient to justify the initiation of an AD investigation with regard to Türkiye. We also recommend determining that the Petition has been filed by, or on behalf of, the domestic industry.

ATTACHMENTS:

I. Scope of the Investigation
II. Analysis of Industry Support
III. Analysis of Allegations and Evidence of Material Injury and Causation

[16] *See* Fourth Türkiye AD Supplement at Exhibit IV-Supp4-6.

Attachment I

Scope of the Investigation

The merchandise covered by this investigation is certain corrugated die-cut cardboard boxes. Corrugated die-cut cardboard boxes are a type of box or carton for use in the food service industry, including to hold pizza pies. Corrugated die cut cardboard boxes are typically manufactured from corrugated paperboard, which is commonly referred to as corrugated cardboard. Corrugated die-cut cardboard boxes are often shipped or delivered flat in bundles of corrugated cardboard die-cut blanks, which are in a ready-to-assemble state such that they can be easily folded by the end user into a ready-to-use food service box.

The corrugated die-cut cardboard boxes covered by this investigation include corrugated cardboard die-cut blanks, whether finished or unfinished and assembled or unassembled. A finished corrugated die-cut cardboard box, whether assembled or unassembled, is one that has undergone final processing, including, but not limited to, printing, coating, or other finishing operations. An unfinished corrugated die-cut cardboard box, whether assembled or unassembled, is one that has not yet undergone final processing.

Corrugated die-cut cardboard boxes are produced from corrugated cardboard sheets that are made from recycled or virgin paper or paperboard materials, which may be bleached or unbleached. These cardboard sheets are "corrugated" or "fluted," which means that they contain at least two outer layers (*i.e.*, top and bottom) of paper or paperboard and an inside layer of fluted paper or paperboard in between the outer layer, such that the inside layer contains channels or pockets of air which makes the cardboard sheet lightweight while retaining strength and durability. The subject merchandise includes corrugated die-cut cardboard boxes with a nominal flute height or thickness between 1.1 millimeters and 4.4 millimeters (which encompasses B-flute, C-flute, D-flute, and E-flute design, as well as any equivalent types of corrugation or fluting).

Corrugated cardboard die-cut blanks are typically formed from corrugated cardboard sheets that are cut to length, die cut into specific box shapes, and/or scored to allow the box to be folded into shape. Subject corrugated die-cut cardboard boxes are typically assembled by the end user by folding a corrugated cardboard die-cut blank into its final shape and generally consist of a single die-cut blank that forms the walls and lid of the finished box. Subject corrugated die-cut cardboard boxes are not typically glued or otherwise assembled using adhesives into their final shape prior to use. The scope of this investigation covers both corrugated die-cut cardboard boxes and corrugated cardboard die-cut blanks, regardless of whether they are finished or assembled at the time of importation.

As they are intended for food contact, in-scope corrugated die-cut cardboard boxes are produced in accordance with food contact safety requirements and are often compliant with U.S. Food and Drug Administration requirements, such as 21 CFR 176.170.

The subject merchandise includes corrugated die-cut cardboard boxes regardless of shape. When assembled, subject corrugated die-cut cardboard boxes are often rectangular or square in shape

when viewed from above, but they may take on other shapes, such as round, hexagonal, or octagonal. A finished and assembled subject corrugated die-cut cardboard box has a length (*i.e.*, the longest dimension) that is at least five inches and a width that is at least five inches. A finished and assembled subject corrugated die-cut cardboard box has a length and width that is no more than 40 inches. The height (*i.e.*, the shortest dimension) of a finished and assembled subject corrugated die-cut cardboard box is no greater than four inches. The width, length, and height dimensions are to be based on the dimensions of the die-cut shape of an individual corrugated die-cut cardboard box or corrugated cardboard die-cut blank, even if the box or blank is imported in a manner in which it is minimally connected to other boxes or blanks, such as through nicking, perforations, or similar attachments.

The corrugated die-cut cardboard boxes covered by the scope of this investigation include merchandise with or without color or printing, such that they may be decorated with one or more graphical designs or logos, or they may be entered in a blank, unprinted state. A corrugated die-cut cardboard box is subject to this investigation regardless of the color of the paper, paperboard, or cardboard. Any graphical images may be printed directly onto the paper, paperboard, or cardboard or they may be overlaid onto the outer or inner faces of a corrugated die-cut cardboard box. Subject corrugated die-cut cardboard boxes are also covered by the scope regardless of whether or not they are coated or lined, including with any materials to increase grease resistance.

The subject merchandise includes corrugated die-cut cardboard boxes with or without ventilation holes or perforations as well as with or without features for holding condiments or other foods. They may include tabs that allow for easily opening the lid. Subject merchandise generally does not incorporate locking tabs, interlocking side panels, folded retention flaps, “dog-ear” closures, or similar mechanisms designed to secure the lid to the body of the box. Subject corrugated die-cut cardboard boxes are covered by the scope whether or not they are accompanied by other parts or materials. The addition of any non-paper, paperboard, or -cardboard materials, such as liners, inserts, or holders, does not remove the subject corrugated die-cut cardboard box from the scope of this investigation.

The corrugated die-cut cardboard boxes subject to this investigation include those products that have been subjected to further processing in a third country, which includes but is not limited to printing, coating, trimming, cutting, punching, assembling, folding, perforating, and/or additional die-cutting or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the in-scope corrugated die-cut cardboard box.

The corrugated die-cut cardboard boxes subject to this investigation are typically classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheading 4819.10.0020. This HTSUS subheading is provided for convenience and customs purposes only, and the written description of the merchandise subject to the investigation is dispositive.

Attachment II

Analysis of Industry Support for the Antidumping and Countervailing Duty Petitions Covering Certain Corrugated Die-Cut Cardboard Boxes from the People's Republic of China, Malaysia, and the Republic of Türkiye

I. Background

Sections 702(c)(4)(A) and 732(c)(4)(A) of the Tariff Act of 1930, as amended (the Act), state that the administering authority shall determine that a petition has been filed by or on behalf of the industry if the domestic producers or workers who support the petition account for: (1) at least 25 percent of the total production of the domestic like product; and (2) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the petition.

Section 771(4)(A) of the Act defines the "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 the total domestic production of the product. Thus, to determine whether a petition has the requisite industry support, the Act directs the U.S. Department of Commerce (Commerce) to look to producers and workers who produce the domestic like product. The U.S. International Trade Commission (ITC), which is responsible for determining whether "the domestic industry" has been injured, must also determine what constitutes a domestic like product in order to define the industry. While both Commerce and the ITC must apply the same statutory definition regarding the domestic like product (section 771(10) of the Act), they do so for different purposes and pursuant to a separate and distinct authority. In addition, Commerce's determination is subject to limitations of time and information. Although this may result in different definitions of the like product, such differences do not render the decision of either agency contrary to law.[1]

Section 771(10) of the Act defines the domestic like product as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this title." Thus, the reference point from which the domestic like product analysis begins is "the article subject to an investigation," *i.e.*, the class or kind of merchandise to be investigated, which normally will be the scope as defined in the Petitions.[2] While Commerce

[1] *See USEC, Inc. v. United States*, 132 F. Supp. 2d 1, 8 (CIT 2001) (citing *Algoma Steel Corp. Ltd. v. United States*, 688 F. Supp. 639, 644 (CIT 1988), *aff'd* 865 F.2d 240 (Fed. Cir. 1989)).

[2] *See* Petitioners' Letter, "Petitions for the Imposition of Antidumping and Countervailing Duties," dated September 9, 2026 (Petitions). The petitioners filed "Petitioners' Response to the 1st Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated September 21, 2026 (First General Issues Supplement), "Petitioners' Response to the 2nd Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated September 28, 2026 (Second General Issues Supplement), in response to Commerce's requests for additional information regarding the Petitions.

is not bound by the criteria[3] used by the ITC to determine the domestic like product in answering this question, we have reviewed these factors[4] as presented by the petitioners[5] in the Petitions.[6]

II. Analysis of Domestic Like Product

Information relevant to the petitioners' proposed definition of the domestic like product can be found in Volume I of the Petitions at 25-28, First General Issues Supplement at 13-15 and Exhibits I-Supp-3 and I-Supp-4, and Second General Issues Supplement at 18-21.

The petitioners do not offer a definition of domestic like product distinct from the scope of the investigations and argue that certain corrugated die-cut cardboard boxes (corrugated die-cut boxes)[7] constitute a single domestic like product, coextensive with the scope.[8] Further, the petitioners contend that other types of boxes, such as non-paper or non-corrugated containers, A-flute and F-flute corrugated food service boxes, and non-food service containers, are not part of the same domestic like product as corrugated die-cut boxes. The petitioners make the following arguments addressing these criteria:

- The petitioners allege that corrugated die-cut boxes share the same physical characteristics and uses and are broadly interchangeable. In contrast, the petitioners allege that other types of boxes do not share the same physical characteristics and uses as corrugated die-cut boxes, and as such, are not interchangeable with corrugated die-cut boxes.
- The petitioners allege that corrugated die-cut boxes are sold through the same or similar channels of distribution – directly to medium and large restaurant chains or through large food service distributors. In contrast, the petitioners allege that other types of boxes have different customers and end uses, and as such, have different channels of distribution from corrugated die-cut boxes.
- The petitioners allege that customers and producers perceive corrugated die-cut boxes as interchangeable, because corrugated die-cut boxes share the same physical characteristics and uses. In contrast, the petitioners allege that customers and producers perceive other types of boxes as distinct products from corrugated die-cut boxes because of the differences in physical characteristics and uses and lack of interchangeability.

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[3] *See Fujitsu Ltd. v. United States*, 36 F.Supp.2d 394, 397-98 (CIT 1999) (*Fujitsu*); *see also Torrington Co. v. United States*, 747 F.Supp. 744, 748-49 (CIT 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); and *Antidumping and Countervailing Duty Handbook*, Fourteenth Edition, ITC Publication 4540 (June 2015) at II-34.

[4] The ITC's traditional six factors are: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions; (5) common manufacturing facilities, processes, and employees; and, where appropriate, (6) price. *See Antidumping and Countervailing Duty Handbook*, Fourteenth Edition, ITC Publication 4540 (June 2015) at II-34.

[5] The petitioners are the American Pizza Boxes Manufacturers Coalition and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (USW) (collectively, the Petitioners). The members of the Coalition are Smurfit Westrock plc (Smurfit Westrock) and Pratt Industries, Inc (Pratt Industries). *See* Petitions at Volume I (page 1).

[6] *See* Petitions at Volume I (pages 25-28); *see also* First General Issues Supplement at 13-15 and Exhibits I-Supp-3 and I-Supp-4; and Second General Issues Supplement at 18-21.

[7] *See* Memorandum, "Product Name Change," dated September 29, 2026.

[8] *See* Attachment I – Scope of the Investigations, to this Checklist.

- The petitioners allege that corrugated die-cut boxes are produced in the same manufacturing facilities, using the same or similar manufacturing process and employees. In contrast, the petitioners allege that other types of boxes are not produced in the same manufacturing facilities and use different manufacturing processes and employees as corrugated die-cut boxes.
- The petitioners allege that corrugated die-cut boxes are sold within a reasonable range of similar prices. The petitioners further allege that while other types of boxes might be priced within that range, the pricing for these other boxes falls along a different continuum than corrugated die-cut boxes.

Commerce's Position:

We analyzed the criteria presented by the petitioners with respect to the ITC's domestic like product factors. Based on our analysis of the information submitted in the Petitions, we have determined that the domestic like product consists of corrugated die-cut boxes, as defined in the scope of the Petitions.[9] Information in the Petitions indicates that corrugated die-cut boxes share the same general physical characteristics and uses, are generally interchangeable, are sold through the same or similar channels of distribution, are perceived by customers and producers as a single product category, are manufactured in common facilities, with the same production processes and production employees, and are priced within a similar range based on performance.[10] With respect to other types of boxes, information in the Petitions indicates that such boxes have different physical characteristics and uses, are not interchangeable with corrugated die-cut boxes, have different channels of distribution, are perceived differently by customers and producers, and are priced differently, and have different manufacturing processes and/or production lines than corrugated die-cut boxes.[11]

Furthermore, unless Commerce finds the petitioners' definition of the domestic like product to be inaccurate, we will adopt the domestic like product definition set forth in the Petitions.[12] We analyzed the information presented by the petitioners and found that there is reason to conclude that corrugated die-cut boxes constitute a single domestic like product. This is consistent with Commerce's broad discretion to define and clarify the scope of an antidumping or countervailing duty investigation in a manner that reflects the intent of the Petitions.[13] Consequently, Commerce's discretion permits interpreting the Petitions in such a way as to best effectuate not only the intent of the Petitions, but the overall purpose of the antidumping and countervailing duty laws as well.[14]

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[9] *See* Attachment I – Scope of the Investigation, to this Checklist.
[10] *See* Petitions at Volume I (pages 25-28); *see also* First General Issues Supplement at 13-15 and Exhibits I-Supp-3 and I-Supp-4; and Second General Issues Supplement at 18-21.
[11] *See* Petitions at Volume I (pages 25-28); *see also* First General Issues Supplement at 13-15 and Exhibits I-Supp-3 and I-Supp-4; and Second General Issues Supplement at 18-21.
[12] *See* Petitions at Volume I (pages 25-28); *see also* First General Issues Supplement at 13-15 and Exhibits I-Supp-3 and I-Supp-4; and Second General Issues Supplement at 18-21.
[13] *See, e.g.*, *Fujitsu*, 36 F.Supp.2d 394 (citing *Kern-Liebers USA, Inc. v. United States*, 19 C.I.T. 393, 396, 881 F.Supp. 618, 621 (1995) (citation omitted)); and *Initiation of Antidumping Duty Investigations: Spring Table Grapes from Chile and Mexico*, 66 FR 26831 (May 15, 2001).
[14] *See Notice of Final Determination of Sales at Less Than Fair Value: Freshwater Crawfish Tail Meat from the People's Republic of China*, 62 FR 41347, 42357 (August 1, 1997).

III. Industry Support Calculation

In determining whether the petitioners have standing (*i.e.*, those domestic workers and producers supporting the Petitions account for: (1) at least 25 percent of the total production of the domestic like product, and (2) more than 50 percent of the production of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the Petitions), in accordance with sections 702(c)(4)(A) and 732(c)(4)(A) of the Act, we conducted the following analysis.

We considered the industry support data contained in the Petitions with reference to the domestic like product as defined in Attachment I, "Scope of the Investigation," to this Checklist, and as discussed above. The petitioners identified themselves and 12 other producers of the domestic like product as the companies constituting the U.S. corrugated die-cut boxes industry.[15] To support their claim, the petitioners provided a declaration from [

].[16] In the declaration, [ ] states that, based on [ ] "extensive knowledge of the companies that manufacture and sell corrugated die-cut boxes and other food service boxes in the United States… the companies identified in the Petitions represent the known U.S. producers, in addition to the petitioners."[17] In addition, the USW, the petitioning union, identified the U.S. corrugated die-cut boxes production facilities with workers that are represented by the USW.[18]

The petitioners note that there is no industry publication that tracks the annual production of corrugated die-cut boxes in the United States; therefore, the petitioners relied on shipment data as a proxy for production.[19] The petitioners argue that shipments are a reasonable proxy for production, noting that U.S. producers typically manufacture corrugated die-cut boxes to satisfy current demand and maintain limited inventories.[20] For support, the petitioners provided a declaration from Donald Roy, former Senior Director of Foodservice Sales at Smurfit Westrock, who was employed with the company for 50 years and was involved in the corrugated die-cut boxes market since the early 1980s.[21] In the declaration, Mr. Roy states that "{p}roducers do not typically maintain significant inventories…and changes in inventory levels do not materially affect annual shipment volumes…{and} as a result, annual shipments closely approximate annual production" in the corrugated die-cut boxes industry.[22] We note that Commerce has accepted shipments as a proxy for production for purposes of calculating industry support in past cases.[23]

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[15] *See* Petitions at Volume I (page 5 and Exhibit I-6).
[16] *See* First General Issues Supplement at I-Supp-5.
[17] *Id.*
[18] *See* Petitions at Volume I (page 5 and Exhibit I-5).
[19] *See* Petitions at Volume I (page 6) and Exhibit I-9; *see also* First General Issues Supplement at Exhibit I-Supp-6.
[20] *See* Petitions at Volume I (page 6 and Exhibit I-9); *see also* First General Issues Supplement at 8-9 and Exhibit I-Supp-6.
[21] *See* First General Issues Supplement at Exhibit I-Supp-6.
[22] *Id.*
[23] *See, e.g.*, *Mattresses from Bosnia and Herzegovina, Bulgaria, Burma, India, Italy, Kosovo, Mexico, the Philippines, Poland, Slovenia, Spain, and Taiwan: Initiation of Less-Than-Fair-Value Investigations*, 88 FR 57433

To establish industry support, the petitioners provided their own 2025 shipments of the domestic like product.[24] In addition, the petitioners provided a letter of support from the Vice President & General Counsel of Packaging Corporation of America, in which the company provided its 2025 shipments of corrugated die-cut boxes.[25] To estimate the total shipments of the domestic like product for the entire U.S. corrugated die-cut boxes industry, the petitioners relied on publicly available information on U.S. consumption of corrugated die-cut boxes, supplemented and adjusted by Mr. Roy's knowledge and experience, and further adjusted to remove U.S. imports and add export shipments of corrugated die-cut boxes.[26] As reasonably available information, the petitioners estimated export shipments for the remaining U.S. producers using their own ratio of export shipments to total shipments.[27] We made an additional adjustment to the denominator to include the supporters' export shipments, not just the export shipments of all other U.S. producers.[28] The petitioners then compared the shipments for the supporters of the Petitions to the estimated total shipments of corrugated die-cut boxes for the entire industry in 2025.[29] Based on information in the Petitions, as adjusted by Commerce, the supporters of the Petitions account for [ ] percent of total shipments of the domestic like product.[30]

Table 1
Calculation of Industry Support

U.S. Producers of Corrugated Die-Cut Boxes	2025 Shipments of Corrugated Die-Cut Boxes (lbs)	Position
Smurfit Westrock	[ ]	Petitioner
Pratt Industries	[ ]	Petitioner
Packaging Corporation of America	[ ]	Support
Total 2025 Shipments by Supporters of the Petitions	[ ]	
Total 2025 Shipments by the U.S. Corrugated Die-Cut Boxes Industry	[ ]	
Total Industry Support	[ ] %	

(August 23, 2023); *see also Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from the Czech Republic, the Republic of Korea, the Russian Federation, and Ukraine: Initiation of Less-Than-Fair-Value Investigations*, 85 FR 47176, 47177 (August 4, 2020); and *Aluminum Extrusions from the People's Republic of China: Initiation of Antidumping Duty Investigation*, 75 FR 22109, 22111 (April 27, 2010).

[24] *See* Petitions at Volume I (Exhibit I-4); *see also* First General Issues Supplement at 9 and Exhibit I-Supp-7; and Second General Issues Supplement at Exhibit I-Supp2-5.

[25] *See* Petitions at Volume I (page 9 and Exhibit I-8).

[26] *See* Petitions at Volume I (Exhibits I-7 and I-9); *see also* First General Issues Supplement at Exhibits I-Supp-6 and I-Supp-7; and Second General Issues Supplement at 16-17 and Exhibit I-Supp2-5.

[27] *See* Second General Issues Supplement at 16-17 and Exhibit I-Supp2-5.

[28] Specifically, we added supporting producers' exports of [ ] lbs, resulting in total 2025 shipments of [ ] lbs (*i.e.*, [ ] + [ ] = [ ]) for the entire U.S. corrugated die-cut boxes industry. *See* Table 1, Calculation of Industry Support.

[29] *See* Second General Issues Supplement at Exhibit I-Supp2-5

[30] *See* Table 1, Calculation of Industry Support.

IV. Challenges to Industry Support

None.

V. Findings

Commerce relied on information provided by the petitioners, as described above, to establish total 2025 shipments of the domestic like product. Using these data, as demonstrated above, we find that the domestic producers and workers who support the Petitions account for at least 25 percent of total shipments of the domestic like product. Commerce further finds that domestic producers and workers who support the Petitions account for more than 50 percent of the total shipments of the domestic like product produced by that portion of the industry expressing support for, or opposition to, the Petitions.[31] Therefore, we find that there is adequate industry support within the meaning of sections 702(c)(4)(A) and 732(c)(4)(A) of the Act.

Commerce conducted a search of the Internet and has been unable to locate information that contradicts the petitioners' assertions. We find that the petitioners have provided data that are reasonably available. For these reasons, we find that there is adequate industry support for initiating these investigations. Accordingly, Commerce finds that the Petitions have met the requirements of sections 702(c)(4)(A) and 732(c)(4)(A) of the Act.

[31] S*ee Tenaris Bay City, Inc. v. United States*, No. 2025-1382, 2026 LX 545375, at *19 n.5 (Fed. Cir. Sep. 18, 2026).

Attachment III

Analysis of Allegations and Evidence of Material Injury and Causation for the Antidumping and Countervailing Duty Petitions Covering Certain Corrugated Die-Cut Cardboard Boxes from the People's Republic of China, Malaysia, and the Republic of Türkiye

I. Introduction

When making a determination regarding the initiation of antidumping and countervailing duty investigations, the U.S. Department of Commerce (Commerce) examines, on the basis of sources readily available to Commerce, the accuracy and adequacy of the evidence contained in the petitions, and determines whether the petitions allege the elements necessary for the imposition of antidumping and countervailing duties and contain information reasonably available to the petitioner that supports the allegations.[1] This attachment analyzes the sufficiency of the allegations and supporting evidence regarding material injury and causation.[2]

II. Definition of Domestic Industry

The domestic industry is described with reference to producers of the domestic like product, as provided for in section 771(4)(A) of the Act. The Petitions[3] define the domestic industry as all U.S. producers of certain corrugated die-cut cardboard boxes (corrugated die-cut boxes).[4] The petitioners[5] identify the producers of the domestic like product as the producers constituting the domestic industry in the United States.[6] For a discussion of the domestic like product, *see* Attachment II, Analysis of Industry Support for the Antidumping and Countervailing Duty Petitions Covering Certain Corrugated Die-Cut Cardboard Boxes from the People's Republic of China, Malaysia, and the Republic of Türkiye.

III. Evidence of Material Injury, or Threat of Material Injury, and Causation

In making a determination regarding material injury and causation, the U.S. International Trade Commission (ITC) is directed to evaluate the volume of subject imports (section 771(7)(B)(i)(I)

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[1] *See* sections 702(c)(1)(A)(i) and 732(c)(1)(A)(i) of the Tariff Act of 1930, as amended (the Act).
[2] *See* 19 CFR 351.202(b)(10).
[3] *See* Petitioners' Letter, "Petitions for the Imposition of Antidumping and Countervailing Duties," dated September 9, 2026 (Petitions); *see also* Petitioners' Letter, "Petitioners' Response to the 1st Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated September 21, 2026 (First General Issues Supplement); "Petitioners' Response to the 2nd Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated September 28, 2026 (Second General Issues Supplement); and "Petitioners' Response to the 3rd Supplemental Questionnaire Regarding Common Issues and Injury Volume I of the Petition," dated October 6, 2026 (Third General Issues Supplement).
[4] *See* Petitions at Volume I (pages 27-28); *see also* Memorandum, "Product Name Change," dated September 29, 2026.
[5] The petitioners are the American Pizza Boxes Manufacturers Coalition (Coalition) and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (collectively, the petitioners). The members of the Coalition are Smurfit Westrock plc, and Pratt Industries, Inc. *See* Petitions at Volume I (pages 1 and 4).
[6] *See* Petitions at Volume I (page 5).

of the Act), the effect of those imports on the prices of domestically-produced like products (section 771(7)(B)(i)(II) of the Act), and their impact on the domestic operations of U.S. producers of like products (section 771(7)(B)(i)(III) of the Act) and may consider other economic factors (section 771(7)(B)(ii) of the Act). Additionally, section 771(7)(C)(iii) of the Act states that:

> {i}n examining the impact {of imports on domestic producers} …, the {ITC} shall evaluate all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to–
>
> (I) 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,
> (II) factors affecting domestic prices,
> (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment,
> (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry …, and
> (V) in {an antidumping proceeding} …, the magnitude of the margin of dumping.

Information relevant to the petitioners' allegations of material injury, or threat thereof, and causation can be found in Volume I of the Petitions at 24-51 and Exhibits I-1 through I-4, I-10, I-12, and I-16 through I-32, and the First General Issues Supplement at 15 and Exhibit I-Supp-8.

The petitioners allege that the domestic industry has experienced the following types of material injury by reason of U.S. imports from the People's Republic of China (China), Malaysia, and the Republic of Türkiye (Türkiye):

- significant increase in the volume of subject imports;
- reduced market share;
- underselling and price depression and/or suppression;
- lost sales and revenues;
- declines in production, capacity utilization, commercial shipments, and employment variables;
- facility closures;
- negative impact on industry's development efforts and returns on new investments;
- negative impact on financial performance; and
- the magnitude of the alleged dumping margins.

The petitioners also allege that the domestic industry could be threatened with the following types of further injury by reason of U.S. imports from China, Malaysia, and Türkiye:

- substantial existing production capacity of subject producers and increase in new capacity of subject producers;
- continued increase in the volume and market penetration of subject imports;
- continued underselling and price depression and/or suppression;
- countervailable subsidies provided by the Government of Türkiye;
- subject producers have potential for product shifting;
- continued decline in existing development and production efforts; and
- subject producers' significant reliance on sales to U.S market.

The Petitions allege that the material injury, or threat thereof, to the domestic industry were caused by the impact of the allegedly dumped and subsidized imports from China, Malaysia, and Türkiye. The information relevant to the petitioners' allegations, as referenced above, demonstrates the effect of these imports on domestic prices and market share, and the consequent impact on the domestic industry, specifically on the domestic industry's operations and financial performance.

The allegations of causation of material injury, or threat thereof, are based upon the factors indicating current material injury, as well as the factors indicating threat of material injury as noted above. The factors related to causation presented in the Petitions are the types of factors that the ITC is directed to consider for the purpose of evaluating causation under sections 771(7)(C) and 771(7)(F) of the Act.

IV. Cumulation

Section 771(7)(G)(i) of the Act requires the ITC to cumulate imports from all countries for 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. In determining whether cumulation is appropriate, the ITC uses a framework of four factors:[7]

- The degree of fungibility between imports from the subject countries and between the subject imports and the domestic like product;
- The presence of sales or offers for sale of the subject imports and the domestic like product in the same geographic markets;
- Whether the subject imports and the domestic like product are handled in common or similar channels of distribution; and
- Whether the subject imports are present in the U.S. market simultaneously.

The petitioners address each of these factors and argue that a reasonable overlap of competition exists with subject imports and with the domestic like product in the United States, and, as a result, the criteria for cumulation have been satisfied.[8]

[7] *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); *see also Fundicao Tupy, S.A. v. United States*, 678 F.Supp. 898, 902 (CIT 1988), *aff'd Fundicao Tupy, S.A. v. United States*, 859 F.2d 915 (Fed. Cir. 1988).
[8] *See* Petitions at Volume I (pages 29-33 and Exhibits I-1, I-3, I-4, I-10, I-12, and I-17).

V. Negligibility

Section 771(24)(A)(i) of the Act states that "imports from a country of merchandise corresponding to a domestic like product identified by the Commission are 'negligible' if such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which the data are available … ."

The petitioners contend that imports from China, Malaysia, and Türkiye are not negligible.[9] The data provided by the petitioners demonstrate that imports of corrugated die-cut boxes from China, Malaysia, and Türkiye individually exceed the three percent negligibility threshold provided under section 771(24)(A)(i) of the Act.[10]

VI. Conclusion

To assess the accuracy and adequacy of the evidence relating to the allegations regarding material injury, threat of material injury, negligibility, and causation, we examined the information presented in the Petitions and compared it with information that was reasonably available (*e.g.*, import data on the ITC website). We did not locate any information that contradicts the petitioners' assertions.

We analyzed the petitioners' evidence regarding material injury, threat of material injury, negligibility, and causation, and have found that the information in the Petitions and the supplements thereto demonstrates a sufficient showing of material injury, or threat of material injury, to the U.S. industry producing corrugated die-cut boxes. Therefore, we find the overall evidence of injury included in the Petitions to be adequate to initiate the investigations of corrugated die-cut boxes from China, Malaysia, and Türkiye. Ultimately, the ITC will make the final determination with respect to material injury, or threat thereof, negligibility, and causation.

[9] *See* Petitions at Volume I (pages 36-37 and Exhibit I-18); *see also* First General Issues Supplement at 15 and Exhibit I-Supp-8.
[10] *See* Petitions at Volume I (pages 36-37 and Exhibit I-18); *see also* First General Issues Supplement at 15 and Exhibit I-Supp-8.