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BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION OF THE
U.S. DEPARTMENT OF COMMERCE
AND THE
U.S. INTERNATIONAL TRADE COMMISSION

PETITIONS FOR THE IMPOSITION OF
ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO
SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED

VOLUME I:
COMMON ISSUES AND INJURY PETITION

IN THE MATTER OF:
CORRUGATED PIZZA BOXES FROM THE PEOPLE'S REPUBLIC OF CHINA,
MALAYSIA, AND THE REPUBLIC OF TÜRKIYE

PETITIONERS:
AMERICAN PIZZA BOX MANUFACTURERS COALITION AND THE
UNITED STEEL, PAPER AND FORESTRY, RUBBER, MANUFACTURING, ENERGY,
ALLIED INDUSTRIAL AND SERVICE WORKERS INTERNATIONAL UNION

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I. INTRODUCTION

These petitions are presented on behalf of 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 (“USW”) (collectively, “Petitioners”). The Coalition is comprised of U.S. corrugated pizza box producers Smurfit Westrock plc (“Smurfit Westrock”) and Pratt Industries, Inc. (“Pratt Industries”).

Petitioners allege that corrugated pizza boxes imported from the People’s Republic of China (“China”), Malaysia, and the Republic of Türkiye (“Turkey”) are being or are likely to be sold at less than normal value (“LTNV”) within the meaning of section 731 of the Tariff Act of 1930 (“the Act”), *codified as amended*, 19 U.S.C. § 1673. Petitioners further allege that corrugated pizza boxes imported from Turkey are subsidized within the meaning of section 701 of the Act and 19 U.S.C. § 1671. These unfairly traded imports have materially injured the U.S. industry producing corrugated pizza boxes and threaten to cause further material injury if trade relief is not granted. These petitions contain information reasonably available to Petitioners in support of these allegations.

Separate volumes regarding the allegations of dumping by subject producers, as well as countervailable subsidies provided to subject producers, are being filed simultaneously at the U.S. Department of Commerce (the “Department”) and the U.S. International Trade Commission (the “Commission”). Petitioners request that antidumping and countervailing duties be imposed to offset the dumping and subsidies detailed in those volumes.

II. EXECUTIVE SUMMARY

Unfairly priced imports of certain corrugated food service boxes, which are commonly referred to as pizza boxes, from China, Malaysia, and Turkey have materially injured the domestic

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industry that has long manufactured this staple product of American life. Large volumes of unfairly traded subject imports entered the United States during the period of investigation (“POI”), increasing 130% by quantity from 2023 to 2025 and another 46% between the first half of 2025 and 2026.¹ As subject imports surge into the U.S. market, they compete head-to-head based on price with the domestic like product, as they are sold through the same channels and for the same end uses and applications.

Yet, because subject producers benefit heavily from dumped prices and government subsidies, unfairly priced subject imports have gained market share and taken sales from the domestic industry. Indeed, across the POI, subject import market share [*increased*] from 2023 to 2025, rising to []% in 2025.² That increase continued in the interim period as subject imports gained another [4.0] percentage points of market share, reaching []% in the first half of 2026.³ At the same time, from 2023 to 2025, U.S. producers’ market share fell from []% to []%.⁴ And, from the first half of 2025 to the first half of 2026, domestic market share decreased further to []%.⁵ Likewise, the domestic industry reports [25] examples of lost sales or lost revenue to subject imports representing more than \$[].⁶

Due to these substantial lost sales and declines in market share, domestic producers’ capacity utilization, production, and U.S. commercial shipments all fell during the POI. By volume, U.S. production and commercial shipments declined []% and []%, respectively.⁷

¹ Official U.S. Import Statistics, attached as **Exhibit I-1**.

² Market Share Analysis, attached as **Exhibit I-2**.

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ Lost Sales and Lost Revenue Data, attached as **Exhibit I-3**.

⁷ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

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And the domestic capacity utilization rate fell [7.0] percentage points across the POI to an unsustainable []%, decreasing further to []% in the first half of 2026.⁸ This has led to a deterioration in the domestic industry's financial performance, especially in 2026 as subject imports continue to surge into the United States. As described below, U.S. producers have invested heavily in domestic corrugated pizza box production. However, the domestic industry has been forced to close facilities and lay off workers due to unfairly traded subject imports, as shown by a []% decline in production workers industry-wide during the POI.⁹

Still, even as domestic producers have taken these measures to fend off unfairly traded imports, low-priced subject imports continue to enter the United States in increasingly large volumes. Consequently, by 2026, the U.S. pizza box industry's financial performance has begun to deteriorate sharply, with profit margins declining to unsustainable levels in the interim period.¹⁰ Namely, in the interim period, the U.S. industry's operating margin fell [] percentage points to a meager []% for the first half of 2026.¹¹ Further, as subject producers benefit from foreign subsidies and expand their production capabilities to increasingly target the U.S. market, the domestic industry now faces an even greater threat going forward from subject imports.

In short, after years of injury and unfair import competition, the financial effects of which are being felt most sharply in 2026, domestic corrugated pizza box producers and their workers find themselves in a vulnerable position such that they cannot withstand further harm from unfairly

⁸ *Id.*

⁹ *Id.*

¹⁰ *See id.*

¹¹ *Id.*

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traded imports. Accordingly, trade relief as a result of these petitions is necessary to support this quintessential American industry and its thousands of workers.

III. COMMON ISSUES

This section contains information required in antidumping duty (“AD”) and countervailing duty (“CVD”) petitions by the regulations of the Department¹² and the Commission.¹³

A. The Name and Address of the Petitioners (19 C.F.R. § 351.202(b)(1))

The Petitioners are the American Pizza Boxes Manufacturers Coalition and the USW. The Coalition is a domestic interested party within the meaning of 19 U.S.C. § 1677(9)(C) and 19 C.F.R. § 351.102(b)(17).¹⁴ The USW is an interested party within the meaning of 19 U.S.C. § 1677(9)(D) and 19 C.F.R. § 351.102(b)(17).

The names, addresses, and telephone numbers of the companies comprising the Coalition (*i.e.*, Smurfit Westrock and Pratt Industries) and the USW are provided below.

Smurfit Westrock plc¹⁵

1000 Abernathy Rd. NE
Atlanta, GA, 30328
(770) 448-2193

Pratt Industries, Inc.

4004 Summit Blvd NE
Suite 1000
Atlanta, GA 30319
(470) 704-6986

¹² 19 C.F.R. § 351.202(b)(1)-(10), (b)(12).

¹³ *Id.* § 207.11.

¹⁴ In addition, the Coalition’s individual members are domestic interested parties within the meaning of 19 U.S.C. § 1677(9)(C) and 19 C.F.R. § 351.102(b)(17).

¹⁵ Smurfit Westrock is a global company with operations in Europe, Latin America, and North America. Provided here is the address and telephone number for the Smurfit Westrock office primarily overseeing its U.S. corrugated pizza box operations.

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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

B. Identity of the Industry on Whose Behalf the Petition Is Filed (19 C.F.R. § 207.11(b)(2)(ii); 19 C.F.R. § 351.202(b)(2))

These petitions are filed on behalf of the U.S. industry that produces the corrugated food service boxes, which are commonly referred to as pizza boxes, described in the scope. As discussed below, the Coalition accounts for a significant majority of U.S. corrugated pizza box production. The USW also represents workers at several corrugated pizza box production facilities in the United States, including those operated by Smurfit Westrock as well as other domestic corrugated pizza box producers.¹⁶ The names, addresses, and telephone numbers of additional domestic producers are provided in **Exhibit I-6**.¹⁷ According to the best information available to Petitioners, **Exhibit I-6** identifies all known producers of the merchandise under consideration in the United States.

C. Information Relating to the Degree of Industry Support for the Petition (19 C.F.R. § 351.202(b)(3))

The relevant statutory provisions provide that a petition is filed by or on behalf of the domestic industry if: (1) domestic producers who support the petition account for at least 25% of the total production of the domestic like product, and (2) domestic producers who support the petition account for more than 50% of the production of the domestic like product produced by that portion of the industry expressing support for or opposition to the petition.¹⁸ According to a

¹⁶ See USW Support Letter at paras 2-3, attached as **Exhibit I-5**.

¹⁷ Additional Domestic Producers, attached as **Exhibit I-6**.

¹⁸ 19 U.S.C. §§ 1671a(c)(4)(A) (countervailing duty petitions), 1673a(c)(4)(A) (antidumping petitions).

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food service packaging industry expert, pizza boxes account for approximately 95% of the food service boxes covered by the scope of these petitions.¹⁹ Therefore, for the purposes of calculating domestic industry support, Petitioners have calculated their share of U.S. production based on shipments of in-scope food service boxes. As shown in **Table 1** below, Petitioners estimate that they constitutes at least []% of domestic producers' commercial shipments of corrugated food service boxes in the United States, which Petitioners believe is a reasonable approximation of Petitioners' share of domestic production.²⁰ Further, non-petitioning U.S. corrugated food service box producer, Packaging Corporation of America ("PCA"), also supports the petitions, which means that supporting domestic producers account for at least [85.0]% of U.S. corrugated food service box production.²¹ As such, Petitioners clearly exceed both of these statutory thresholds.

¹⁹ Declaration of Donald Roy at para. 2, attached as **Exhibit I-9**.

²⁰ Domestic Industry Support Calculation, attached as **Exhibit I-7**.

²¹ Packaging Corporation of America Support Letter, attached as **Exhibit I-8**; Domestic Industry Support Calculation, attached as **Exhibit I-7**.

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Table 1: Corrugated Food Service Box Domestic Industry Support Calculation²²

Item	2025 Shipments (pounds)	
U.S. Consumption	1,260,000,000	a
U.S. Imports	155,113,842	b
Domestic Producers U.S. Shipments	1,044,886,158	c = a - b
Smurfit Westrock U.S. Shipments	[]	d
Pratt Industries U.S. Shipments	[]	e
Petitioners U.S. Shipments	[]	f = d + e
Petitioners Share of U.S. Shipments	[]	g = f / c
PCA U.S. Shipments	[]	h
Supporting U.S. Producers U.S. Shipments	[]	i = f + h
Supporting U.S. Producers Share of U.S. Shipments	[85.0]	j = i/c

As part of its domestic industry support calculations, as summarized in **Table 1**, Petitioners estimate total U.S. consumption of corrugated food service boxes as 1,260,000,000 pounds in 2025. As detailed in **Exhibit I-9**, this estimate is based on a recent article from the American Forest and Paper Association as well as current guidance regarding corrugated pizza box recycling from Domino's Pizza, which is the largest pizza chain in the world, as corroborated by an industry expert.²³ These sources indicate that the U.S. market for corrugated pizza boxes approximates three billion units annually, which equates to 600,000 tons or 1,200,000,000 pounds.²⁴ As noted above, pizza boxes account for approximately 95% of the food service boxes covered by the scope of these petitions.²⁵ As such, Petitioners increased the size of U.S. market for corrugated pizza boxes (*i.e.*, 1,200,000,000 pounds) by 5% to calculate the volume of U.S. consumption of in-scope food

²² Domestic Industry Support Calculation, attached as **Exhibit I-7**.

²³ Declaration of Donald Roy at para. 5, Attachments 1-2, attached as **Exhibit I-9**.

²⁴ *Id.*

²⁵ *Id.* at para. 2.

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service boxes (*i.e.*, 1,260,000,000 pounds).²⁶ Petitioners then subtract the volume of U.S. imports of corrugated food service boxes entered under the primary Harmonized Tariff Schedule of the United States (“HTSUS”) number 4819.10.0020 to estimate domestic producers’ U.S. shipments of corrugated food service boxes as 1,104,886,158 pounds in 2025.²⁷

Next, Petitioners calculate Coalition members’ U.S. shipments of corrugated food service boxes by the actual U.S. commercial shipments reported by Smurfit Westrock and Pratt Industries for 2025.²⁸ Petitioners then calculate their share of total U.S. production of corrugated food service boxes (*i.e.*, []%) by dividing Petitioners’ U.S. shipments by total domestic producers’ U.S. shipments for 2025.²⁹ Similarly, Petitioners add PCA’s U.S. commercial shipments of corrugated pizza boxes and divide by total domestic producers U.S. shipments for 2025 to calculate supporting domestic producers share of total U.S. production (*i.e.*, [85.0]%).³⁰

This methodology is further substantiated by **Exhibit I-9**, which contains a declaration from a former U.S. corrugated food service box company executive who, based on five decades of experience, notes that Petitioners’ share of U.S. production of corrugated food service boxes under this approach is likely conservative because the denominator, *i.e.*, estimated annual U.S. production calculated by subtracting annual imports from annual U.S. consumption, is inflated by the output of U.S. processors engaged in simple cutting and folding operations.³¹ In other words,

²⁶ Domestic Industry Support Calculation, attached as **Exhibit I-7**.

²⁷ Official U.S. Import Statistics, attached as **Exhibit I-1**; Domestic Industry Support Calculation, attached as **Exhibit I-7**.

²⁸ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

²⁹ Domestic Industry Support Calculation, attached as **Exhibit I-7**.

³⁰ *Id.* Petitioners note that it has only included PCA’s shipments of pizza boxes, which further indicates that its domestic industry support calculation is conservative.

³¹ Declaration of Donald Roy at para. 7, attached as **Exhibit I-9**.

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if anything, supporting domestic producers' share of actual U.S. production corrugated food service boxes is likely greater than its conservative estimate of [85.0]%.³²

Moreover, in addition to the Coalition, Petitioners include the USW, which represents workers at several corrugated pizza box production facilities in the United States, including those operated by Smurfit Westrock, PCA, and Hood Container Corporation ("Hood").³² Therefore, with the support of non-petitioning USW member Hood, the percentage of U.S. production supporting the petitions is greater than []%.

While Petitioner represents a large majority of the U.S. market, Petitioners do not have access to actual production or shipment data for all U.S. producers. However, Petitioners believe that the U.S. shipment estimates provided above are a reasonable approximation of its share of U.S. production of in-scope corrugated food service boxes. As this demonstrates, production from U.S. producers that support the petition exceed the statutory requirements. Therefore, Petitioners have the required industry support to file these petitions on behalf of the domestic industry.

D. Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4))

Petitioners have not previously sought relief from imports of dumped and subsidized corrugated pizza boxes. Petitioners have not filed for relief from imports of the subject merchandise under Section 337 of the Act or Section 301 of the Trade Act of 1974.³³

³² See USW Support Letter at paras. 2-3, attached as **Exhibit I-8**. USW members include corrugated pizza box production facilities operated by Smurfit Westrock in [*locations*]. *Id.*

³³ While Petitioners did not "file for" relief under Section 301, corrugated pizza boxes are currently covered by the Section 301 duties in place on certain imports from China. In September 2018, the U.S. Trade Representative imposed 10% duties on Chinese imports classified under Harmonized Tariff Schedule of the United States ("HTSUS") category 4819.10.00, which includes corrugated pizza boxes. Those duties were later increased to 25%. *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 47,974, 48,000 (U.S. Trade Rep. Sep. 21, 2018); *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20,459 (U.S. Trade Rep. May 9, 2019).

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E. Scope of the Investigation and a Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5))**1. Scope of the Investigation**

The physical characteristics of the covered products, which define the scope of this investigation, are as follows:

The merchandise covered by this investigation is certain corrugated food service boxes, which are commonly referred to as *pizza boxes*. Corrugated food service boxes are a type of box or carton manufactured from paper, paperboard, and/or cardboard for use in the food service industry, including to hold pizza pies. Corrugated food service 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 food service boxes covered by this investigation include corrugated cardboard die-cut blanks, whether finished or unfinished and assembled or unassembled.

Corrugated food service 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 food service boxes of B-flute, C-flute, D-flute, and E-flute design, as well as any equivalent types of corrugation or fluting.

The country of origin of a subject corrugated food service box is determined by where the corrugated cardboard sheet is produced.

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 food service boxes are typically assembled by the end user by folding a corrugated cardboard die-cut blank into its final shape. Subject corrugated die-cut blanks are not typically glued into their final shape. The scope of this investigation covers both corrugated

Additionally, imports entered under HTSUS 4819.10.00 from China, Malaysia, and Turkey are covered by the Section 301 measures related to various countries’ failures to impose and effectively enforce prohibition on the importation of goods made with forced labor. *Notice of Actions in Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure of Each Economy To Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced With Forced Labor*, 91 Fed. Reg. 47,318 (U.S. Trade Rep. July 28, 2026).

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food service boxes and corrugated cardboard die-cut blanks, regardless of whether they are finished or assembled at the time of importation.

The subject merchandise includes corrugated food service boxes regardless of shape. When assembled, subject corrugated food service 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 food service box has a length (*i.e.*, the longest dimension) that is at least five inches and a width that is at least five inches. There is no maximum length or width for subject merchandise. The height (*i.e.*, the shortest dimension) of a finished and assembled subject corrugated food service box is no greater than four inches.

The corrugated food service 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 food service 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 food service box. Subject corrugated food service 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 food service boxes with or without ventilation holes or perforations as well as with or without features for holding condiments or other foods. Subject corrugated food service 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 food service box from the scope of this investigation.

The corrugated food service 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, and/or perforating or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the in-scope corrugated food service box.

The corrugated food service boxes subject to investigation order 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 order is dispositive.

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2. Technical Characteristics and Uses

The merchandise subject to this investigation consists of corrugated food service boxes intended for use in the food service industry, most commonly to hold pizza pies. Corrugated pizza boxes covered by the scope may be referred to as corrugated pizza boxes, cardboard pizza boxes, or pizza boxes. In the U.S. market, approximately 95% of the food service boxes covered by the scope are pizza boxes.³⁴ The remaining 5% are largely comprised of certain sides, sandwich, and catering boxes.³⁵ Corrugated pizza 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 pizza box. Corrugated pizza boxes are purchased and used by pizza distributors, restaurants, and individuals. Below are examples of ready-to-use in-scope merchandise.



Corrugated pizza boxes are produced from corrugated cardboard sheets that are made from recycled or new (*i.e.*, virgin) paper or paperboard materials. This paper and paperboard may be

³⁴ Declaration of Donald Roy at para. 2, Attachments 1-2, attached as **Exhibit I-9**.

³⁵ *Id.*

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bleached or unbleached. These cardboard sheets are corrugated or fluted. This 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 layers. As a result, the inside layer contains channels or pockets of air that make the cardboard sheet lightweight but also strong and durable. Corrugated cardboard sheets can be produced using different types of flute designs (*e.g.*, type A-F fluting). In-scope corrugated pizza boxes are made from corrugated cardboard sheets of B-flute, C-flute, D-flute, or E-flute design, as well as any equivalent types of corrugation or fluting.³⁶ Illustrated below and exemplified further in **Exhibit I-11** are the types of corrugated fluting used for pizza boxes.³⁷



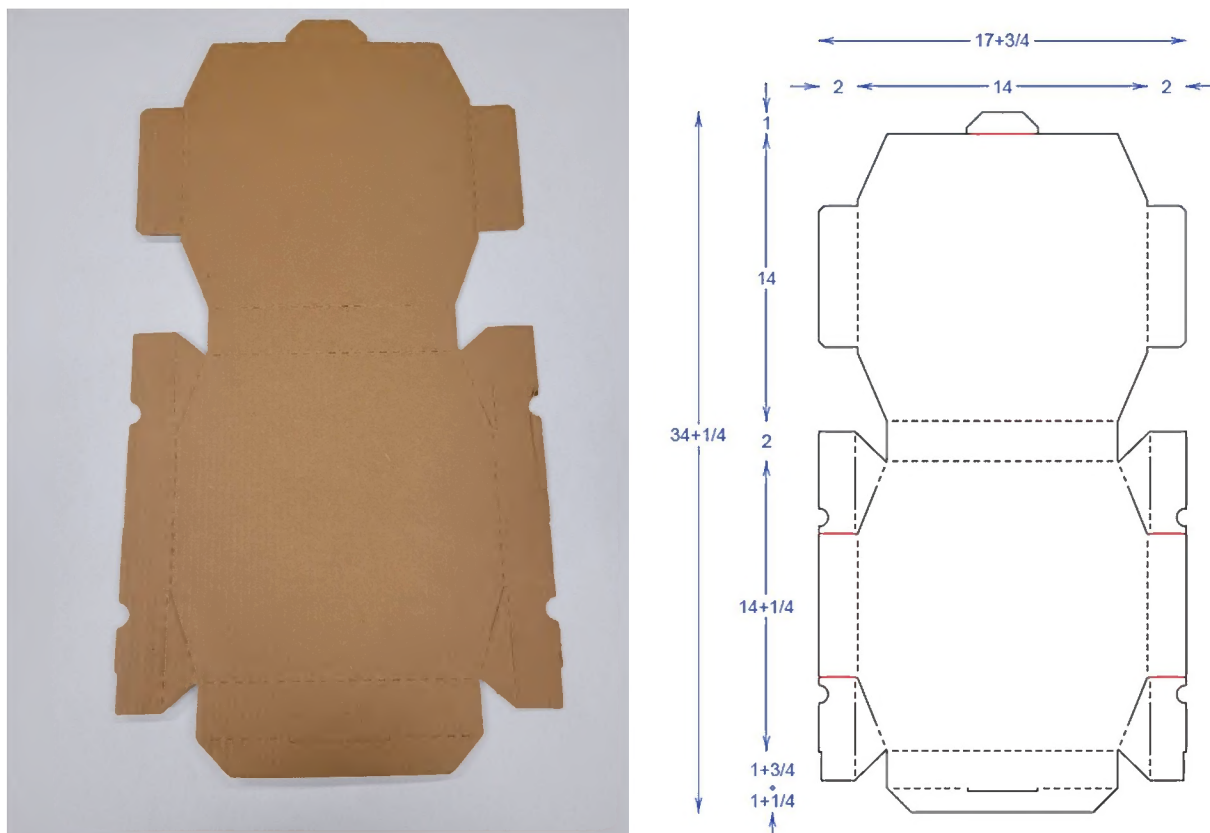
Corrugated cardboard die-cut blanks are formed from corrugated cardboard sheets that are cut to length, die cut into specific box shapes, and cut, perforated, or scored to allow the box to be folded into shape. Corrugated pizza boxes are typically assembled by the end user by folding a corrugated cardboard die-cut blank into a ready-to-use box. Each blank is typically designed to be assembled into a single, ready-to-use pizza box. Unlike other types of corrugated boxes, corrugated die-cut blanks are typically not glued into their final shape, but rather simply folded.

³⁶ See Declaration of [*name*] at para. 3, attached as **Exhibit I-10**.

³⁷ Corrugated Flute Types, attached as **Exhibit I-11**. Petitioners note that corrugated flute types are typically produced to common standards and specifications. However, the scope covers corrugated pizza boxes produced to these flute types and their equivalents, including any international equivalents to the type B-E categorization of fluting that is common in the United States.

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Corrugated pizza boxes are often shipped or delivered as blanks in flat bundles or cases in a ready-to-assemble state, such that they can be easily folded into ready-to-use pizza boxes. A flat delivered bundle or case often contains as many as 100 corrugated pizza boxes, although bundle and shipment sizes vary. As shown below, corrugated die-cut blanks take a unique shape and the dimensions of the fully assembled, ready-to-use box can be easily discerned from the ready-to-assemble die-cut blank.



The scope covers corrugated pizza boxes regardless of shape or design. When assembled, corrugated pizza boxes are often rectangular or square when viewed from above. However, they may also take on other shapes, such as round, hexagonal, or octagonal. Corrugated pizza boxes may also have cut or folded corners to reduce the amount of cardboard used per box. And they may be designed to custom shapes or with custom features.

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A finished and assembled corrugated pizza box has a length (*i.e.*, the longest dimension) that is at least five inches and a width that is at least five inches. There is no maximum length or width for subject merchandise. Common sizes for assembled in-scope merchandise include personal pan or small boxes (7-9 inch length and width), medium boxes (10-12 inch length and width), large or extra large boxes (14-16 inch length and width), and giant boxes (30 inch length and width). The height (*i.e.*, the shortest dimension) of an assembled, subject corrugated pizza box is no greater than four inches.

As detailed above, at the time of importation, subject merchandise may be imported as unassembled corrugated cardboard die-cut blanks that are subsequently folded into their final shape by the end user. The country of origin of imported corrugated pizza boxes should be based on where the corrugated cardboard sheets are produced as the majority of the product's value is attributable to the paper and cardboard production stages.

The corrugated pizza boxes covered by the scope of this investigation include merchandise with or without color or printing. Corrugated pizza boxes are often made from white or kraft (*i.e.*, brown) cardboard sheets, but the scope covers pizza boxes regardless of the color of the paper, paperboard, or cardboard. In-scope merchandise may be decorated or printed with one or more graphical designs or logos, or they may be imported in a blank or unprinted state. Graphical images may be printed directly onto the paper, paperboard, or cardboard, or they may be overlaid onto the inner or outer faces of a pizza box. Subject corrugated pizza boxes are also covered by the scope regardless of whether they are coated, including with any materials to increase grease resistance.

The subject merchandise includes corrugated pizza boxes with or without ventilation holes or perforations as well as with or without features for holding condiments or other foods. For instance, certain in-scope products may have die-cut features for holding condiments or sauces.

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Corrugated pizza boxes are also often delivered with liners or circles, which retain heat and absorb grease, as well as pizza savers (also known as a pizza table, tripod, or stool), which keep the box lid from sagging. Subject corrugated pizza boxes are covered by the scope whether or not they are accompanied by these or other parts or materials.

All in-scope corrugated pizza boxes sold in the United States must comply with U.S. Food and Drug Administration (“FDA”) rules regarding materials that have direct contact with food. Under 21 C.F.R., the FDA establishes a framework for regulating any material that comes in direct contact with food products, and it prohibits the use of any such materials that do not meet those standards.³⁸ Specifically, 21 C.F.R. § 176.170 describes the materials and substances that may be safely used on the food contact surfaces of in-scope pizza boxes and other similar products.³⁹ For example, as shown below, [*labeling description*

].⁴⁰ Similarly, in addition to the FDA’s food contact material rules, many corrugated pizza box customers require third-party auditing of their pizza box producers to ensure full compliance with food safety requirements.

³⁸ See, e.g., 21 C.F.R. § 110 (current good manufacturing practice in manufacturing, packing, or holding human food); *Inventory of Food Contact Substances Listed in 21 CFR*, U.S. Food & Drug Administration (Apr. 16, 2021), attached as **Exhibit I-12**.

³⁹ See generally 21 C.F.R. § 176.170.

⁴⁰ See Smurfit Westrock Print Cards, attached as **Exhibit I-13**.

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3. Production Methodology

The production process for corrugated pizza boxes consists of three primary phases: (1) manufacturing paper or paperboard materials; (2) producing corrugated cardboard sheets designed for pizza box production from paper or paperboard; and (3) cutting to length or die cutting corrugated cardboard sheets into box specific shapes, which can include applying coatings and printing graphical images. This process results in a ready-to-assemble corrugated pizza box. The box is then typically folded into its final shape by the end user (*e.g.*, pizza restaurant). The same process generally applies regardless of the type, size, or design of corrugated pizza box.

As an initial step, the paper or paperboard materials that form the primary fiber or paper content of the product are manufactured by converting wood chips and/or recycled paper into a fibrous pulp. The pulp is washed and refined in preparation for entering a paper machine. The paper machine forms the paper by removing excess water and tightly compressing the fiber into a continuous sheet of paper (*i.e.*, a master roll). The roll of paper is then cut and rewound into specific widths of paper and transported by rail or truck to corrugated converters. Rolls are the primary inputs that are used by manufacturers of subject merchandise. Not all producers of subject

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merchandise produce their own paper and thus omit this step. Petitioners believe that a significant number of producers in subject countries purchase paper rolls from unaffiliated suppliers.

In the second stage, the paper and paperboard materials are corrugated to form corrugated cardboard sheets. This entails rolling multiple sheets of paper on machinery known as a corrugator. At a minimum, in a corrugated cardboard sheet, there is an outer layer, an inner layer, and a middle layer that is fluted. On the corrugator, as the layers are rolled, the middle layer is fluted (or given a wave) by pressing the sheet under heat through grooved metal rolls. Different types of fluting design may be prescribed based on product specifications. Subject merchandise includes corrugated pizza boxes of B-flute, C-flute, D-flute, and E-flute design, as well as any equivalent types of corrugation or fluting. The inner layer and the outer layer are glued to the tips of the fluted middle layer and rolled together to form a flat corrugated cardboard sheet. Materials used in this stage of the production process include paper (which may be white or brown), corn starch or other materials that serve as a binder, caustic soda, borax, and additives that help prevent the absorption of moisture.

Either before or after the corrugated cardboard sheet is formed, designs and logos may be printed or coatings applied to the paper, paperboard, or cardboard sheet utilizing various inks. Colors or graphical designs (*e.g.*, logos) are typically printed directly on the paper or paperboard or are applied onto the inner or outer faces of the cardboard sheet. Similarly, various coatings may be applied, often to the pizza-facing side of the sheet to increase resistance to grease.

As a final step, the corrugated cardboard sheets are cut to length and/or die cut into box specific shapes ready-for-assembly. This produces a corrugated cardboard die-cut blank. Using a cross cutter or similar machinery, this stage involves cutting, as necessary, the corrugated cardboard sheets to specified lengths and individual box blanks. A single corrugated cardboard

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sheet is typically cut to form multiple individual box blanks. Similarly, using a slitter and/or die cutter, the sheets are scored, trimmed, punched, and/or perforated. This produces a finished but unassembled corrugated pizza box (often delivered as a flat bundle) that can then be folded as a single piece into its final box shape by the end user.

Once a set of pizza boxes has been produced, boxes are bundled together in a *case* with 50 boxes being the most common box count per case. A case typically is nothing more than plastic sealing wrap and a corrugated cardboard board (to act as a stiffener). Cases are marked with product labels and are then stacked on shipping pallets with woven packing strap.

4. Tariff Classification

Imports of subject corrugated pizza boxes are primarily entered under HTSUS number 4819.10.0020 (*i.e.*, sanitary food and beverage containers of corrugated paper or paperboard). **Exhibit I-14** contains a copy of this chapter of the HTSUS.⁴¹ The tariff category provided is for the convenience of the U.S. government and does define the scope of these petitions. Rather, the written description of the merchandise under investigation is dispositive.

Subject import volumes are most appropriately measured by weight or area. The official U.S. import statistics under HTSUS 4819.10.0020 are primarily reported by weight in kilograms.⁴² As detailed below, U.S. industry data is often reported by area in square feet (or thousand square feet). The value of a corrugated pizza box is driven largely by the size of the corrugated cardboard die-cut blanks (*i.e.*, measured by weight and/or area). Further, there is very little fiber or paper waste in the cutting or processing stage. So, given that subject product is imported as a ready-to-

⁴¹ HTSUS Chapter 48, attached as **Exhibit I-14**.

⁴² *See* Official U.S. Import Statistics, attached as **Exhibit I-1**. Petitioners note that the summary data provided in this exhibit have been converted from kilograms to pounds to align on a weight unit basis with other reported data.

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assemble, flat corrugated pizza box, subject import volumes can be properly assessed on a weight or area basis.

F. The Names of the Home Market Countries and the Name of Any Intermediate Country Through Which the Merchandise Is Transshipped (19 C.F.R. § 351.202(b)(6))

The corrugated pizza boxes covered by these petitions are imported from China, Malaysia, and Turkey. Petitioners do not currently have any evidence that the subject merchandise is produced in a country other than those from which it is exported. However, Petitioners emphasize that subject corrugated pizza boxes include those that have been subjected to further processing in a third country. This further processing may include but is not limited to printing, coating, trimming, cutting, punching, and/or perforating or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in a subject country.

G. The Names and Addresses of Each Person Believed to Sell the Merchandise at LTNV and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(i)(A))

The names and addresses of the Chinese, Malaysian, and Turkish entities believed by Petitioners to be producing and exporting the corrugated pizza boxes subject to these petitions are provided in **Exhibit I-15**.⁴³ Petitioners compiled this exhibit based primarily upon information publicly available online, information reported from [*data source*

] and Petitioners' industry knowledge. Reasonably available information does not allow Petitioners to identify the proportion of total exports to the United States that these exporters accounted for during the most recent twelve-month period. However, Petitioners believe that the companies listed in **Exhibit I-15** account for the majority of subject imports.

⁴³ List of Known Foreign Producers, attached as **Exhibit I-15**.

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H. Factual Information Related to the Calculation of Export Price and the Constructed Export Price of the Subject Merchandise and the Normal Value (19 C.F.R. § 351.202(b)(7)(i)(B))

Volumes III and IV of these petitions contain the information necessary to substantiate LTNV allegations and information related to exports of subject merchandise from Malaysia and Turkey.

I. Factual Information Related to the Calculation of Normal Value of the Foreign Like Product in Non-Market Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(C))

China is treated as a non-market economy for antidumping purposes. Volume II of these petitions contains the information necessary to substantiate LTNV allegations and factual information relevant to China.

J. The Names and Addresses of Each Person Believed to Benefit from a Countervailable Subsidy Who Exports the Subject Merchandise to the United States and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(ii)(A))

The names and addresses of the Turkish entities believed to benefit from countervailable subsidies and who have exported corrugated pizza boxes subject to these petitions are provided in **Exhibit I-15**.⁴⁴ Reasonably available information does not allow Petitioners to identify the proportion of total exports to the United States that these exporters accounted for during the most recent twelve-month period. As stated above, however, Petitioners believe that the companies listed in **Exhibit I-15** account for the majority of subject imports.

K. The Alleged Countervailable Subsidy and Factual Information Relevant to the Alleged Countervailable Subsidy (19 C.F.R. § 351.202(b)(7)(ii)(B))

Volume V of these petitions contains information concerning the alleged countervailable subsidies as well as factual information relevant to the alleged countervailable subsidies, the law,

⁴⁴ *Id.*

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regulations, and decrees under which the subsidies were bestowed, the manner in which the subsidies were provided, and Petitioners' estimation, to the extent practicable, of the value of the subsidies to subject producers and exports of subject corrugated pizza boxes.

L. The Volume and Value of the Merchandise Imported During the Most Recent Two-Year Period (19 C.F.R. § 351.202(b)(8))

According to official U.S. import statistics, imports of corrugated pizza boxes from China, Malaysia, and Turkey into the United States under HTSUS code 4819.10.0020 totaled 40.2 million pounds in 2023, 63.1 million pounds in 2024, and 92.4 million pounds in 2025, increasing 130% during that period..⁴⁵ In the first half of 2025 compared to the first half of 2026, Chinese, Malaysian, and Turkish imports under this HTSUS code increased from 37.8 million pounds to 55.2 million pounds, rising more than 46% between those periods.⁴⁶ By landed duty paid value ("LDPV"), imports of corrugated pizza boxes from China, Malaysia, and Turkey into the United States under HTSUS code 4819.10.0020 totaled \$33.2 million in 2023, \$47.1 million in 2024, and \$68.3 million in 2025, increasing 106% between 2023 and 2025.⁴⁷ From the first half of 2025 to the first half of 2026, Chinese, Malaysian, and Turkish imports under this HTSUS code increased by LDPV from \$27.3 million to \$36.2 million, rising 33% between the two periods.⁴⁸ These data are summarized in the tables below.

⁴⁵ Official U.S. Import Statistics, attached as **Exhibit I-1**.

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ *Id.*

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Table 2: Corrugated Pizza Boxes Import Volumes (pounds)⁴⁹

U.S. Imports	2023	2024	2025	3-yr Change	Jan-Jun 2025	Jan-Jun 2026	Interim Change
World	68,073,947	96,416,911	155,113,842	127.9%	64,818,974	90,038,781	38.9%
China	25,446,914	29,744,815	17,392,087	-31.7%	10,588,062	6,011,076	-43.2%
Turkey	14,770,251	29,372,348	61,552,083	316.7%	24,678,378	35,487,799	43.8%
Malaysia	22,778	4,016,269	13,412,701	58784.0%	2,491,455	13,718,487	450.6%
Subject Subtotal	40,239,943	63,133,432	92,356,871	129.5%	37,757,895	55,217,362	46.2%

Table 3: Corrugated Pizza Boxes Import Values (U.S. dollars)⁵⁰

U.S. Imports	2023	2024	2025	3-yr Change	Jan-Jun 2025	Jan-Jun 2026	Interim Change
World	56,830,309	73,458,057	118,669,864	108.8%	48,872,484	66,934,655	37.0%
China	20,902,848	20,976,966	14,224,095	-32.0%	8,573,612	3,514,637	-59.0%
Turkey	12,297,382	23,554,770	45,632,975	271.1%	17,158,590	24,603,473	43.4%
Malaysia	16,088	2,520,935	8,423,546	52259.2%	1,562,048	8,114,216	419.5%
Subject Subtotal	33,216,318	47,052,671	68,280,616	105.6%	27,294,250	36,232,326	32.7

Petitioners believe that the vast majority of imports of subject corrugated pizza boxes enter the United States under HTSUS code 4819.10.0020, as this tariff line is specific to boxes made from corrugated paper or paper board and used as sanitary food and beverage containers.⁵¹ Petitioners are not aware of other HTSUS categories under which subject merchandise would likely be entered. Further, Petitioners believe that while certain out-of-scope corrugated food service containers may be entered under this tariff code, the large majority of imports under HTSUS 4819.10.0020 are likely to be corrugated pizza boxes.

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ HTSUS Chapter 48, attached as **Exhibit I-14**.

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M. The Names and Addresses of Each Entity the Petitioners Believe Imports or is Likely to Import the Subject Merchandise (19 C.F.R. § 207.11(b)(2)(iii); 19 C.F.R. § 351.202(b)(9))

The names and addresses of importers of corrugated pizza boxes from China, Malaysia, and Turkey known to the Petitioners are listed in **Exhibit I-16**.⁵² However, it is likely that there are additional importers of subject merchandise that Petitioners are unable to identify. Petitioners request that the Department and Commission obtain this information from U.S. Customs and Border Protection, as this information is not reasonably available from public sources at this time.

IV. DUMPED AND SUBSIDIZED IMPORTS FROM CHINA, MALAYSIA, AND TURKEY HAVE CAUSED MATERIAL INJURY TO THE DOMESTIC CORRUGATED PIZZA BOXES INDUSTRY AND THREATEN FURTHER MATERIAL INJURY

A. Introduction

Imports of corrugated pizza boxes from China, Malaysia, and Turkey have materially injured the domestic industry. Large volumes of unfairly traded subject imports entered the United States during the POI, increasing year-over-year and accelerating further in 2026. Subject producers have used unfair prices to gain market share and take sales from the domestic industry, resulting in a significant decline in U.S. producers' share of the U.S. market. Consequently, domestic producers' capacity utilization, production, and U.S. commercial shipments have all declined as well. This has led to a deterioration in the domestic industry's financial performance, especially in 2026 as subject imports continue to surge into the United States. U.S. producers have invested heavily in domestic corrugated pizza box production. Yet the domestic industry has been forced to close facilities and lay off workers due to unfairly traded subject imports. Still, buoyed by dumped prices and government subsidies, low-priced subject imports continue to enter the

⁵² List of Known U.S. Importers, attached as **Exhibit I-16**.

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United States at increasingly large volumes. Accordingly, by 2026, the remaining U.S. corrugated pizza box facilities are seeing deteriorating financial performance with operating income and net income margins declining to unsustainable levels in the interim period. Further, an already vulnerable U.S. industry now faces additional threat from subject imports due to foreign producers' massive capacity and targeting of the U.S. market.

B. The Domestic Like Product Consists of All Corrugated Pizza Boxes Covered by the Scope

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the domestic like product.⁵³ The “domestic like product” is defined 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.”⁵⁴ The like product determination is a factual one made on a case-by-case basis.⁵⁵ The Commission generally considers the following factors: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price.⁵⁶ In evaluating these factors, the Commission looks for clear dividing lines and disregards minor variations.⁵⁷

⁵³ See *NEC Corp. v. Dep't of Commerce*, 22 CIT 1108, 1109 (1998).

⁵⁴ 19 U.S.C. § 1677(10).

⁵⁵ See, e.g., *NEC*, 22 CIT at 1110.

⁵⁶ See *Cleo, Inc. v. United States*, 501 F.3d 1291, 1295 (Fed. Cir. 2007).

⁵⁷ See *id.*

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1. **All Types of Corrugated Pizza Boxes Fall Within a Single Domestic Like Product**

Consistent with its traditional analysis, the Commission should define a single like product coextensive with the scope of this investigation. *First*, corrugated pizza boxes are produced along a continuum of sizes and designs, but all in-scope corrugated pizza boxes share the same basic physical characteristics and end uses. As discussed above, all corrugated pizza boxes are primarily produced from paper, paperboard, and/or cardboard materials, first formed as a corrugated cardboard sheet and then as a ready-to-assemble corrugated cardboard die-cut blank or ready-to-use corrugated pizza box. All in-scope products are also produced from corrugated paper or paperboard materials, distinguishing them in many instances from out-of-scope products, including non-paper or non-corrugated pizza containers. While an assembled corrugated pizza box can take on different shapes—such as square, round, hexagonal, or others, when viewed from above—they are all readily identifiable as pizza boxes and serve the same primary purpose. Indeed, a corrugated pizza box has no common end use other than to hold food, and for the vast majority of in-scope pizza boxes the exclusive end use is to hold pizza pies. And a corrugated cardboard die-cut blank has no other use than to be folded into a pizza box.

Second, due to their shared physical characteristics and end uses, in-scope corrugated pizza boxes are fully interchangeable. For instance, pizza boxes are produced along a continuum of sizes (*e.g.*, personal, medium, large, giant) with varying designs and features (*e.g.*, coating, printing) but they are used interchangeably for the same purpose—to hold food items, typically a pizza pie. Compared to other industries and products, there are relatively few types of corrugated pizza boxes, and they are all produced, sold, and used interchangeably.

Third, all types of in-scope corrugated pizza boxes are sold through the same channels of distribution. In the United States, corrugated pizza boxes are typically sold directly to medium and

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large pizza chains or through large pizza distributors. For instance, corrugated pizza box producers sell directly to large pizza chains, such as Dominos or Pizza Hut, as well as pizza distributors, such as Sysco or US Foods, who then often service smaller pizza chains and other customers. The full range of corrugated pizza boxes are sold through both channels of distribution.

Fourth, customers perceive all in-scope corrugated pizza boxes to be similar. Given the high degree of interchangeability and similar physical characteristics and end uses, the end user of a corrugated pizza box does not distinguish between different types of pizza boxes. And the end user uses all sizes and designs of corrugated pizza boxes, depending on the size and brand of pizza that they purchase.

Fifth, in-scope corrugated pizza boxes are made in the same facilities, through the same production process, and using the same production employees. As highlighted above, the same general production process is used regardless of the size or design of a corrugated pizza box. In the United States, the full spectrum of corrugated pizza boxes is made in the same facilities, with the same materials, on the same equipment, and using the same employees.

Sixth, there is significant pricing overlap among in-scope corrugated pizza boxes. The price of a corrugated pizza box is driven largely by the size of the box as well as the features added, including paper color, printing, coating, die cut features (*e.g.*, condiment holders), and specialty shapes. As such, there is often overlap in pricing between, for example, a medium sized pizza box with upgraded printing, coating, or other features and a large sized pizza box without such features.

C. There is a Single Domestic Industry Consisting of All Domestic Producers

Section 771(7)(4) of the Act defines the domestic industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like

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product constitutes a major proportion of the total domestic production of the product.”⁵⁸ The Commission should find that there is a single domestic industry manufacturing corrugated pizza boxes in the United States.

As noted above, the production process for corrugated pizza boxes is comprised primarily of three stages: (1) manufacturing paper or paperboard production; (2) producing corrugated cardboard sheets designed for pizza box production from paper or paperboard; and (3) cutting to length or die cutting corrugated cardboard sheets into box specific shapes. A company should only be considered part of the domestic industry if, at a minimum, it manufactures corrugated cardboard die-cut blanks from domestically produced corrugated cardboard sheets. As shown above, the design and production of the cardboard sheet and die-cut blanks form the vast majority of the value of a finished corrugated pizza box. Companies that import corrugated cardboard die-cut blanks and then perform minor processing (*e.g.*, printing) in the United States are mere processors and should not be considered part of the domestic industry of corrugated pizza box producers. In many other investigations, the Commission has found that companies with similar assembly or processing operations are not part of the domestic industry.⁵⁹

⁵⁸ 19 U.S.C. § 1677(4)(A).

⁵⁹ See, *e.g.*, *Chassis and Subassemblies from China*, Inv. No. 701-TA-657, USITC Pub. 5187 (May 2021) (Final) at 19-25 (“We find that CIE’s operations assembling subassemblies into complete chassis were insufficient to constitute domestic production of chassis.”); *Quartz Surface Products From China*, Inv. Nos. 701-TA-606 and 731-TA-1416, USITC Pub. 4794 (June 2018) (Prelim.) at 15; *Multilayered Wood Flooring from China*, Inv. Nos. 701-TA-476 and 731-TA-1179, USITC Pub. 4278 (Nov. 2011) (Final) at 7-8; *Wooden Cabinets and Vanities from China*, Inv. Nos. 701-TA-620 and 731-TA-1445, USITC Pub. 5042 (Apr. 2020) (Final) at 18-19 (“{W}e continue to find that importers’ assembly of RTA flat packs in the United States do not involve sufficient production-related activities to constitute domestic production”); *Low Speed Personal Transportation Vehicles from China*, Inv. Nos. 701-TA-731 and 731-TA-1700, USITC Pub. 5652 (Aug. 2025) (Final) at 15-26.

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D. Subject Imports Are Causing Material Injury to the Domestic Industry

In determining whether a domestic industry is experiencing present material injury caused by unfairly traded imports, the Commission considers:

- (I) the volume of imports of the subject merchandise;
- (II) the effect of imports of that merchandise on prices in the United States for domestic like products; and
- (III) the impact of imports of such merchandise on domestic producers of domestic like products.⁶⁰

An analysis of these factors shows that the corrugated pizza box industry is suffering material injury by reason of subject imports.

1. The Commission Should Cumulate Subject Imports

For purposes of evaluating the volume and price effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed on the same day, if such imports compete with each other and with the domestic like product in the U.S. market.⁶¹ In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product . . . ;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

⁶⁰ 19 U.S.C. § 1677(7)(B)(i).

⁶¹ *Id.* § 1677(7)(G)(i). None of the exceptions to cumulation apply. *See id.* § 1677(7)(G)(ii).

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(4) whether the subject imports are simultaneously present in the market.⁶²

While no single factor is necessarily determinative, and the list of factors is not exhaustive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.⁶³ Only a “reasonable overlap” of competition is required. As shown below, each of the Commission’s factors indicates that subject imports compete with one another and with the domestic like product.

First, corrugated pizza boxes produced in the United States and the subject countries are highly fungible. As a matter of fact, corrugated pizza boxes made in the United States are produced from the same materials and to the same physical characteristics as pizza boxes from China, Malaysia, and Turkey.⁶⁴ Indeed, in many instances the end-user does not know the manufacturer or country-of-origin of the pizza box it is using. This is because many pizzerias use plain or unmarked corrugated pizza boxes sourced from foodservice distributors. Likewise, U.S. pizzerias typically produce pizza pies to common sizes and dimensions (*e.g.*, small, medium, large), which leads to standard sizing and highly interchangeable pizza boxes.⁶⁵

Moreover, all corrugated pizza boxes sold in the United States must comply with FDA rules regarding materials that have direct contact with food. As noted above, under 21 C.F.R., the FDA establishes a framework for regulating any material that comes in direct contact with food

⁶² See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280, USITC Pub. 1845 (May 1986) (Final) at 8 n.29, *aff’d*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898, 899 (Ct. Int’l Trade 1988), *aff’d*, 859 F.2d 915, 915 (Fed. Cir. 1988).

⁶³ See, *e.g.*, *Wieland Werke, AG v. United States*, 718 F. Supp. 50, 52 (Ct. Int’l Trade 1989).

⁶⁴ Declaration of [*name*] at para. 3, attached as **Exhibit I-10**.

⁶⁵ *Id.*

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products, and it prohibits the use of any such materials that do not meet those standards.⁶⁶ These strict rules apply equally to domestically produced corrugated pizza boxes and subject imports. As a result of these standards, corrugated pizza boxes from all sources share the same general designs, materials, dimensions, and capabilities. Additionally, the large number of lost sales and lost revenue identified in **Exhibit I-3**, which include [

company names] confirms that customers can easily, and do, substitute subject imports for the domestic like product.

Second, corrugated pizza boxes from each of the subject countries compete with each other and the domestic like product in the same geographic markets throughout the United States. Domestic producers of corrugated pizza boxes compete against subject imports on a daily basis across all regions of the United States.⁶⁷ In large part, this is because corrugated pizza boxes, whether domestically produced or imported, are most commonly sold in the U.S. market through distributors and pizza companies.⁶⁸ This facilitates head-to-head competition between subject imports and the domestic like product across the entire United States. To illustrate, [

company names] is a major player in the market that imports and distributes subject imports.⁶⁹ [] takes delivery of corrugated pizza boxes from Chinese, Malaysian, and Turkish sources, places them into warehouses [] and then resells them to retailers

⁶⁶ See 21 C.F.R. § 110 (current good manufacturing practice in manufacturing, packing, or holding human food); *Inventory of Food Contact Substances Listed in 21 CFR*, U.S. Food & Drug Administration (Apr. 16, 2021), attached as **Exhibit I-12**.

⁶⁷ Declaration of [*name*] at para. 2, attached as **Exhibit I-10**.

⁶⁸ *Id.* at para. 5.

⁶⁹ *Id.*

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and lower level distributors and food service companies.⁷⁰ Further, as discussed above, all corrugated pizza boxes must comply with FDA regulations to be used throughout the country. And the lost sales and lost revenues reported in **Exhibit I-3** also reflect purchasers across the country.

Third, imports from subject countries and the domestic like product are sold through the same channels of distribution. As noted above, corrugated pizza boxes are most commonly sold through distribution and food service companies, but they are also sold through restaurant supply warehouses or directly to restaurants and restaurant chains.⁷¹ Both subject imports and domestically produced corrugated pizza boxes are sold through the same general channels of distribution.⁷² Indeed, as highlighted above, many subject imports compete directly with the domestic like product in the distribution and pizza company channels of distribution through large importers and distributors like [*name*].⁷³ Again, the lost sales and lost revenue data show that U.S. producers [

],⁷⁴ Soliciting information from subject foreign producers will show further that subject imports and the domestic like product compete directly in all channels.

Fourth, and finally, the subject imports and the domestic like product have been simultaneously present in the U.S. market throughout the POI. The official import statistics show that Chinese-, Malaysian-, and Turkish-origin corrugated pizza boxes were imported in substantial

⁷⁰ *Id.* See also [], attached as **Exhibit I-17**
([]).

⁷¹ Declaration of [*name*] at para. 4, attached as **Exhibit I-10**.

⁷² *Id.* at para. 5.

⁷³ *Id.*

⁷⁴ See Lost Sales and Lost Revenue Data, attached as **Exhibit I-3**.

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volumes during each year of the POI.⁷⁵ Likewise, domestically produced pizza boxes were produced and sold in large quantities during each year of the POI.⁷⁶

Accordingly, for these reasons, since these petitions are filed on the same day and subject imports compete with each other and with the domestic like product in the U.S. market, the requirements for cumulation are met.

2. Conditions of Competition

a. Corrugated Pizza Boxes Are Primarily Sold on the Basis of Price

Price is the predominant consideration in corrugated pizza box purchases. As discussed above, corrugated pizza boxes share the same general characteristics and are otherwise comparable in major respects, regardless of whether they are imported or produced domestically.⁷⁷ Most corrugated pizza boxes in the United States are sold through distribution or food service companies with subject imports and the domestic like product competing head-to-head on price in the same channels.⁷⁸ The significant number and volume of lost sales and lost revenue allegations, as reflected in **Exhibit I-3**, further demonstrates the degree to which corrugated pizza boxes are primarily sold based on price in the U.S. market.

b. Corrugated Pizza Box Demand Typically Correlates with U.S. Pizza Consumption and General Economic Trends

Demand for corrugated pizza boxes is driven primarily by the volume of pizzas sold for takeout and delivery in the United States, which is in turn determined largely by U.S. pizza consumption and general economic trends. As takeout and delivery pizza is a discretionary

⁷⁵ Official U.S. Import Statistics, attached as **Exhibit I-1**.

⁷⁶ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

⁷⁷ Declaration of [] at para. 3, attached as **Exhibit I-10**.

⁷⁸ *Id.* at paras. 4-5.

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purchase for many consumers, broad economic indicators (*e.g.*, inflation, gross domestic product growth, consumer confidence) are often indicative of underlying pizza (and thus pizza box) demand. Further, U.S. pizza consumption often follows broad seasonal trends, peaking in the fall and winter months to align with cooler weather, football season, and holiday events. Additionally, corrugated pizza box consumption is tied broadly to restaurant pizza consumption, but it is most specifically related to takeout and delivery pizza consumption. So, even as pizzeria sales decline in some segments, pizza box demand can be offset by increases in takeout and delivery sales, particularly through the use of food delivery apps and services.

3. The Volume of Subject Imports Is Significant

In evaluating the volume of imports, the Commission considers whether the absolute and relative volumes of imports, as well as changes in volumes, are significant.⁷⁹ The available data show that the volume of subject imports, both in absolute terms and relative to U.S. consumption, is significant within the meaning of the relevant statutory provision.

a. The Volume of Subject Imports Is Significant in Absolute Terms

The volume of subject imports was significant in absolute terms during the POI. In 2023, corrugated pizza box imports under HTS 4819.10.0020 from the subject countries amounted to 40.2 million pounds (or \$33.2 million by value).⁸⁰ By 2024, that volume rose to more than 63.1 million pounds by quantity (or \$47.1 million by value).⁸¹ And by 2025 subject import volumes reached 92.4 million pounds by quantity (or \$68.3 million by value).⁸² That is, subject imports increased 130% by quantity and 106% by value from 2023 to 2025. Meanwhile, as detailed further

⁷⁹ 19 U.S.C. § 1677(7)(C)(i).

⁸⁰ Official U.S. Import Statistics, attached as **Exhibit I-1**.

⁸¹ *Id.*

⁸² *Id.*

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below, U.S. producers' shipments declined during this period, and the domestic industry lost substantial market share to subject imports.⁸³

Similarly significant and rising subject import volumes are also present in the interim period. From January – June 2025 to January – June 2026, corrugated pizza box imports under HTS 4819.10.0020 from the subject countries increased from 37.8 million pounds to more than 55.2 million pounds by quantity. In other words, between the first half of 2025 and 2026, subject imports increased 46% by quantity.⁸⁴ During the same period, subject import volumes rose 33% by value.⁸⁵

b. Subject Imports Gained Significant Market Share During the POI

Subject imports captured a substantial share of U.S. demand for corrugated pizza boxes and gained market share at the domestic industry's expense during the POI. Petitioners provide at **Exhibit I-2** a reasonable approximation of market share, based on the information reasonably available to it, which demonstrates the prevalence of subject imports.⁸⁶ This estimate is based on petitioning and supportive U.S. producers' actual shipments and official U.S. import statistics from China, Malaysia, and Turkey.⁸⁷ This analysis demonstrates that subject producers' market share [*increase*] from 2023 to 2025, rising to []% in 2025.⁸⁸ That increase continued in the

⁸³ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**; Market Share Analysis, attached as **Exhibit I-2**.

Petitioners note that the domestic industry trade and financial trade submitted in support of these petitions includes data from Coalition members (Smurfit Westrock and Pratt Industries) as well as non-petitioner PCA, who as indicated above supports the petitions. *See* Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

⁸⁴ Official U.S. Import Statistics, attached as **Exhibit I-1**.

⁸⁵ *Id.*

⁸⁶ Market Share Analysis, attached as **Exhibit I-2**.

⁸⁷ *Id.*

⁸⁸ *Id.*

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interim period as subject imports gained another [4.0] percentage points of market share, reaching []% in the first half of 2026.⁸⁹ At the same time, the domestic industry's market share steadily declined. From 2023 to 2025, U.S. producers' market share fell from []% to []%.⁹⁰ From the first half of 2025 to the first half of 2026, domestic market share decreased further to []%.⁹¹

c. Subject Imports Are Not Negligible

The Commission will consider imports from a subject country to be negligible if they account for less than 3% of total imports of the subject merchandise.⁹² The Commission may make its determination using “reasonable estimates on the basis of available statistics.”⁹³ The Commission may rely on official import statistics, questionnaire data, or some combination of sources.⁹⁴ In assessing negligibility, the Commission will examine “the most recent 12-month period for which data are available that precedes” the filing of the petition.⁹⁵ The most recent twelve-month period for which data are available is August 2025 through July 2026.⁹⁶ At **Exhibit I-18**, Petitioners provide an analysis of imported corrugated pizza boxes based on official U.S. import statistics for HTS 4819.10.0020. This analysis shows that corrugated pizza box imports

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ *Id.*

⁹² 19 U.S.C. §§ 1673b(a)(1); 1673d(b)(1); 1677(24)(A).

⁹³ *Certain Oil Country Tubular Goods from India, Korea, the Philippines, Taiwan, Thailand, Turkey, Ukraine, and Vietnam*, Inv. Nos. 701-TA-499-500 and 731-TA-1215-1217 and 1219-1223, USITC Pub. 4489 (Sept. 2014) (Final) at 16.

⁹⁴ *See, e.g., Certain Cold-Rolled Steel Products From Argentina, Brazil, Japan, Russia, South Africa, and Thailand*, Inv. Nos. 701-TA-393 and 731-TA-829-830, 833-834, 836 and 838, USITC Pub. 3283 (Mar. 2000) (Final) at 9-10.

⁹⁵ 19 U.S.C. § 1677(24)(A)(i).

⁹⁶ Negligibility Calculation, attached as **Exhibit I-18**.

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from China, Malaysia, and Turkey accounted for 6.9%, 14.0%, and 40.1%, respectively, of total imports.⁹⁷ As such, imports from each subject source are not negligible.

4. The Subject Imports Have Had Negative Price Effects on the Domestic Like Product

In evaluating the effect of subject imports on prices, the Commission considers whether there has been significant underselling by the subject imports, and whether imports significantly suppressed or depressed domestic prices.⁹⁸ As detailed above, corrugated pizza boxes from the subject countries and domestic producers are highly fungible. Regardless of source, pizza boxes sold in the United States are made from the same materials, produced to the same characteristics, and must comply with the same FDA rules regarding food contact materials. Subject imports and domestically produced corrugated pizza boxes also compete with each other in the same geographic markets across the United States on a daily basis.⁹⁹ Further, imports from subject countries and the domestic like product are sold through the same channels of distribution—most commonly through distribution and pizza companies but also sold through restaurant supply warehouses or directly to restaurants and restaurant chains.¹⁰⁰

As a result, subject imports and the domestic like product compete directly and aggressively with each other in the U.S. market. In doing so, they compete primarily based on price.¹⁰¹ This has led to subject imports underselling the domestic like product throughout the POI. The dumped and subsidized prices of subject imports also depressed and suppressed prices by

⁹⁷ *Id.*

⁹⁸ 19 U.S.C. § 1677(7)(C)(ii).

⁹⁹ See Declaration of [] at para. 2, attached as **Exhibit I-10**.

¹⁰⁰ *Id.* at para. 4.

¹⁰¹ See, e.g., *id.* at para. 2 (citing “[]”).

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preventing domestic producers from raising prices in response to increasing costs. On this basis, the Commission should determine that subject imports had significant negative price effects on the domestic like product.

Subject imports' negative price effects are also clear from the U.S. producers' significant reported lost sales and lost revenue. Petitioners have provided information estimating that U.S. producers have lost sales or revenue of at least [] in value since January 1, 2023.¹⁰² Subject importers routinely sold corrugated pizza boxes at prices below those of domestic producers to win these sales.¹⁰³ The magnitude of these lost sales and lost revenues also demonstrates that subject imports are competing directly with the domestic like product with a direct adverse effect on the domestic industry's prices and sales. Similarly, the significant dumping margins illustrated in volumes II through IV of these petitions further show the degree to which subject imports are having negative price effects in the U.S. market.

The Commission will need to collect detailed information regarding domestic and subject products to assess the extent of underselling in this investigation. Consistent with standard practice in the corrugated pizza boxes industry, the Commission should ask companies to report quantity data on a thousand square feet basis (commonly referred to as "MSF"). Petitioners recommend that the Commission collect data on the following pricing products:

Product 1. Corrugated pizza box, 12-inch length (longest dimension), B-Flute corrugation, kraft exterior and kraft interior coloring, two-color exterior printing.

Product 2. Corrugated pizza box, 10-inch length (longest dimension), B-Flute corrugation, white exterior and kraft interior coloring, two-color exterior printing.

¹⁰² See Lost Sales and Lost Revenue Data, attached as **Exhibit I-3**.

¹⁰³ See *id.*

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Product 3. Corrugated pizza box, 16-inch length (longest dimension), B-Flute corrugation, white exterior and kraft interior coloring, two-color exterior printing.

Product 4. Corrugated pizza box, 16-inch length (longest dimension), B-Flute corrugation, kraft exterior and kraft interior coloring, two-color exterior printing.

Finally, given that importers enter corrugated pizza boxes for their own use as well as for retail sale, the Commission should collect purchase cost data from importers. Indeed, as illustrated in **Exhibit I-16**, many of the largest known importers of subject merchandise (*e.g.*, Nemco) are also large foodservice distributors who then sell imported pizza boxes to other distributors, pizza chains, and individual pizzerias.¹⁰⁴ Accordingly, the point of competition between domestic producers and importers is often at the point of importation. As such, the Commission should request that importers provide quarterly quantities and values upon import for the pricing products imported from the subject countries and used by the importer or sold by the importer at retail.

5. The Adverse Impact of Subject Imports on the Domestic Industry is Significant

In examining the impact of subject imports on the domestic industry, the Commission is instructed to “evaluate all relevant economic factors which have a bearing on the state of the industry in the United States.”¹⁰⁵ These factors include, but are not limited to:

- (I) actual and potential decline in output, sales, market share, profits, productivity, return on investments, 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;

¹⁰⁴ List of Known U.S. Importers, attached as **Exhibit I-16**.

¹⁰⁵ 19 U.S.C. § 1677(7)(C)(iii).

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- (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product; and
- (V) the magnitude of the margin of dumping.¹⁰⁶

The Commission is directed to evaluate all factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁰⁷ A review of these factors shows substantial indicators of injury to the domestic industry by reason of the subject imports in this investigation.

The presence of unfairly traded imports has adversely impacted the domestic industry’s production and trade indicators. As emphasized above, U.S. producers of corrugated pizza boxes sought to fend off the surge of low-priced subject import volumes for as long as possible, including by shuttering multiple facilities throughout the POI. By 2026, however, the continued pressure of unfairly priced import competition led to a marked deterioration in the industry’s trade and financial performance, even as the lowest performing domestic facilities had already been closed due to the import surge. This leaves the U.S. industry in a perilous condition—materially harmed by subject imports, with the specter of additional injury imminently looming.

As subject import volumes surged from 2023 to 2025, and accelerating further in 2026,¹⁰⁸ the trade indicators of U.S. corrugated pizza box producers have worsened. Domestic producers’ capacity utilization rate fell [7.0] percentage points from 2023 to 2025, reaching a meager []% in the last full year of the POI.¹⁰⁹ U.S. capacity utilization has deteriorated further in the interim

¹⁰⁶ *Id.* § 1677(7)(C)(iii)(I)-(V).

¹⁰⁷ *Id.* § 1677(7)(C)(iii).

¹⁰⁸ Official U.S. Import Statistics, attached as **Exhibit I-1**.

¹⁰⁹ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

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period, falling [] percentage points between the first halves of 2025 and 2026 to []%.¹¹⁰ Despite ample available capacity, U.S. producers' commercial shipment volumes declined during the POI, decreasing []% from 2023 and 2025 and remaining at reduced levels in 2026.¹¹¹ Net sales volumes experienced similar trends, declining [3]% between 2023 and 2025 and remaining at depressed levels in the interim period.¹¹² And production quantities fell too, decreasing []% during the POI.¹¹³

As a result of declining capacity utilization, production, shipments, and sales, the domestic industry was forced to shutter facilities and reduce its workforce. Most strikingly, as low-priced subject imports grabbed market share, U.S. producers were forced to shut down corrugated pizza box production facilities. For instance, in November 2025, Smurfit Westrock announced the closure of its Atlanta, GA pizza box facility, which closed earlier this year and resulted in the permanent layoff of 55 workers.¹¹⁴ The company also announced the closure of its Wakefield, MA pizza box facility in March 2026, resulting in the layoff of 91 employees in May 2026.¹¹⁵ Likewise, driven in part by these closures, from 2023 to 2025, the average number of production related workers employed by U.S. producers declined by [], reflecting a [22.0]% decrease.¹¹⁶ The hours worked by U.S. production related workers similarly declined during the POI.¹¹⁷

¹¹⁰ *Id.*

¹¹¹ *Id.*

¹¹² *Id.*

¹¹³ *Id.*

¹¹⁴ Katie Pyzyk, *Smurfit Westrock to close Atlanta plant, affecting 55 workers*, Packaging Dive (Nov. 10, 2025), attached as **Exhibit I-19**.

¹¹⁵ Trea Lavery, *Packaging Manufacturer to lay off 91, close Mass. Facility*, Yahoo! Finance (Mar. 23, 2026), attached as **Exhibit I-20**.

¹¹⁶ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

¹¹⁷ *Id.*

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The domestic industry also faced rising costs during the POI. From 2023 to 2025, domestic producers' costs of goods sold rose [4.0]% per unit, which continued in the interim period where costs per unit rose another []% between the first halves of 2025 and 2026.¹¹⁸

Unsurprisingly, these dynamics severely harmed the domestic industry's financial performance. As noted above, the domestic industry sought to fend off the surge in unfairly priced imports by closing facilities and reducing production. And while that allowed U.S. producers to maintain a modest operating income in 2025, by 2026, even the enhanced efficiency of domestic corrugated pizza box production could not compete with the ongoing surge of unfairly priced subject imports. Consequently, so far in 2026, domestic profitability has begun to deteriorate.¹¹⁹ From the first half of 2025 to the first half of 2026, operating income as a percentage of net sales fell from []% to []%.¹²⁰ The net income margin similarly fell during the interim period from []% to []%.¹²¹ Thus, as subject imports continue to gain market share (across the POI and in the interim period), the domestic industry's financial performance is declining rapidly.

Subject imports also frustrate the industry's development efforts and degrade return on new investments. During the POI, the domestic industry made significant capital investments, seeking to optimize and modernize its operations. For example, Smurfit Westrock invested \$136 million in a corrugated box plant in Wisconsin, which was completed in April 2025 and includes pizza box production lines.¹²² Indeed, the domestic industry's capital expenditures exceeded \$[

¹¹⁸ *Id.*

¹¹⁹ *See id.*

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² Katie Pyzyk, *Automation takes center stage at Smurfit Westrock 'superplant' in Wisconsin*, Packaging Dive (May 7, 2026), attached as **Exhibit I-21**.

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] each year from 2023 to 2025.¹²³ However, as subject imports pressured the market throughout the POI, U.S. producers could not invest as heavily, with capital expenditures declining []% across the POI. During the interim period, when subject imports started to have the most consequential impact on the industry's financial performance, U.S. producers invested even less, reducing their capital expenditures by [50].¹²⁴ In this regard, the ongoing surge of low-priced imports—and its impact on U.S. producers' pricing and market share—impacts not just the ability of the domestic industry to continue to invest in its domestic operations but also to achieve the return it would have expected from investments made in recent years.

Finally, the magnitude of the subject imports unfair pricing is significant. Petitioners estimate dumping margins of 96.62 – 568.50%, 110.73%, and 120.65 – 210.37% from China, Malaysia, and Turkey, respectively. Being forced to compete with imports dumped at such significant rates will undoubtably continue to have an adverse effect on the domestic industry. This is substantiated by Petitioners' significant lost sales and lost revenue allegations, which estimate that the domestic industry has lost sales or revenue to subject imports of at least \$[] during the POI.¹²⁵

E. Subject Imports Threaten Material Injury to the Domestic Industry

Available evidence demonstrates that subject imports threaten the domestic corrugated pizza boxes industry with further material injury. In determining whether subject imports threaten a domestic industry with material injury, the Commission considers several factors, including:¹²⁶

¹²³ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

¹²⁴ *Id.*

¹²⁵ *See* Lost Sales and Lost Revenue Data, attached as **Exhibit I-3**.

¹²⁶ 19 U.S.C § 1677(7)(F).

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- A significant rate of increase in the volume or market penetration of imports of the subject merchandise;
- Price effects of the subject imports;
- The nature of any countervailable subsidies;
- Existing unused production capacity or potential increases in production capacity in the exporting country;
- Inventories of the subject merchandise;
- The potential for product-shifting; and
- Impact on development and production efforts.¹²⁷

The Commission may also consider any “other relevant economic factor” as necessary.¹²⁸

These factors are present in this case and will be demonstrated throughout the investigation.

1. Subject Imports Have Increased and Gained Market Share, Suggesting the Likelihood of Substantially Increased Imports

As a preliminary matter, when evaluating threat of material injury, the Commission may “cumulatively assess the volume and price effects of imports of the subject merchandise” where petitions are filed on the same day and subject imports compete with each other and with the domestic like product.¹²⁹ As discussed above, these petitions have been filed on the same day and imports of subject merchandise from China, Malaysia, and Turkey are highly interchangeable and compete directly with each other and with the domestic like product. Thus, the Commission should consider the cumulative effects of subject imports in its threat analysis.

Subject imports have been growing their presence in the U.S. market over the past years and captured significant market share between 2023 and 2025.¹³⁰ Indeed, subject imports increased

¹²⁷ *Id.* § 1677(7)(F)(i).

¹²⁸ *Id.*

¹²⁹ *Id.* § 1677(7)(H).

¹³⁰ Market Share Analysis, attached as **Exhibit I-2**.

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129.5% by volume across the POI, rising from 40.2 million pounds in 2023 to 92.4 million pounds in 2025.¹³¹ And subject imports volumes increased another 46.2% between the first half of 2025 and the first half of 2026.¹³² As a result, driven by their dumped and subsidized pricing, subject imports captured market share from domestic producers. In fact, subject producers' market share more than doubled from 2023 to 2025, rising to []% in 2025.¹³³ That increase continued in the interim period as subject imports gained another [4.0] percentage points of market share, reaching []% in the first half of 2026.¹³⁴ At the same time, the domestic industry's market share steadily declined. From 2023 to 2025, U.S. producers' market share fell from []% to []%.¹³⁵ And from the first half of 2025 to 2026, U.S. producers' market share decreased further to []%.¹³⁶

This rapid increase in subject import volumes and corresponding loss of market share has caused the domestic industry's financial performance to deteriorate. Petitioners report significant lost sales and lost revenue to low-priced subject imports.¹³⁷ Further, especially as subject imports have continued to rise in 2026, domestic producers' profits are declining. Indeed, from the first half of 2025 to the first half of 2026, the industry's operating and net income margins fell from [*decrease comparison*].¹³⁸ Accordingly, the surge in dumped and subsidized imports indicates "the likelihood of substantially increased imports" that threaten the U.S. industry with additional material injury.

¹³¹ Official U.S. Import Statistics, attached as **Exhibit I-1**.

¹³² *Id.*

¹³³ Market Share Analysis, attached as **Exhibit I-2**.

¹³⁴ *Id.*

¹³⁵ *Id.*

¹³⁶ *Id.*

¹³⁷ Lost Sales and Lost Revenue Data, attached as **Exhibit I-3**.

¹³⁸ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

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2. Subject Imports Enter at Prices Likely to Have a Significant Depressing or Suppressing Effect on Domestic Prices

The statute requires the Commission to consider “whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices and are likely to increase demand for further imports.”¹³⁹ During the POI, subject imports used dumped and subsidized pricing to win sales and leverage down the domestic industry’s prices and are likely to continue doing so in the future. Domestic producers have provided [] examples of lost sales or lost revenue representing more than \$[]

.¹⁴⁰ Or, as one industry representative has put it, subject producers are using “[
aggressive pricing tactics]” to win sales from U.S. producers.¹⁴¹ As subject imports continue to grab market share, subject producers’ aggressive practices and the subject imports’ adverse effects are likely to accelerate in the future. Indeed, once offered, an unfairly low price becomes the new standard among customers. This represents an ongoing and worsening threat of further material injury to an already vulnerable industry.

3. Subject Producers Receive Subsidies That Incentivize Exports

As part of its threat analysis, the Commission must consider whether a countervailable subsidy is involved and whether that countervailable subsidy is contingent upon export performance or a preference for domestic goods.¹⁴² As discussed in volume V of these petitions, the Turkish government provides numerous countervailable subsidies that encourage and facilitate the export of subject merchandise to the United States. In particular, national and state-level

¹³⁹ 19 U.S.C. § 1677(7)(F)(i)(IV).

¹⁴⁰ Lost Sales and Lost Revenue Data, attached as **Exhibit I-3**.

¹⁴¹ Declaration of [] at para. 2, attached as **Exhibit I-10**.

¹⁴² 19 U.S.C. § 1677(7)(F)(i)(I).

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governments provide corrugated pizza boxes producers with countervailable subsidies in the form of beneficial tax arrangements, preferential loans, export financing, and grants, among others. In addition to the subsidies they receive from their own governments, Turkish producers also receive transnational benefits from the Russian government.

Foreign producers in Malaysia and China also likely benefit from broad government support. Indeed, the Department recently concluded countervailing duty investigations on various Chinese and Malaysian industries. For example, in *Float Glass from Malaysia*, the Department found that Malaysian producers and exporters benefited from provision of goods and services for less-than-adequate remuneration, including land and electricity, and beneficial tax treatment.¹⁴³ Similarly, in *L-lysine from China*, the Department found that Chinese producers and exporters received a wide variety of countervailable subsidies including financing, insurance, and loan guarantees; beneficial tax treatment; tax credits; preferential lending; grant programs; and the provision of goods and services for less-than-adequate remuneration.¹⁴⁴ Thus, consistent with the Department's established practice of finding countervailable subsidies to be provided by the Chinese and Malaysian government across many industries, it is likely that similar subsidy programs are also available to the corrugated pizza boxes industry.

¹⁴³ Issues and Decision Memorandum accompanying *Float Glass Products from Malaysia*, 91 Fed. Reg. 5,720 (Dep't Commerce Feb. 9, 2026) (final affirm. countervailing duty deter.) (ACCESS Barcode: 4875701-02).

¹⁴⁴ Issues and Decision Memorandum accompanying *L-lysine from the People's Republic of China*, 91 Fed. Reg. 46,399 (Dep't Commerce July 23, 2026) (final affirm. countervailing duty deter.) (ACCESS Barcode: 4938204-02).

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4. Existing Unused Production Capacity or Potential Increases in Production Capacity in the Exporting Country

a. *Subject Producers Have Significant Unused Capacity, Are Adding New Capacity, and May Maintain Significant Inventories*

Foreign producers in Malaysia, China, and Turkey have substantial existing unused capacity available to imminently ramp up shipments to the U.S. absent trade relief. Not only that, but public reporting also indicates that subject corrugated pizza boxes producers are bringing new capacity online. For instance, Chinese producer Guangdong Gaoyi Packaging Technology Co., Ltd. (“Gaoyi”) reports a capacity utilization at around 70%.¹⁴⁵ Similarly, Zhejiang Jingxing Paper Industry is building a new plant in Malaysia to expand the company’s overseas production capacity and promote integration under China’s Belt and Road Initiative.¹⁴⁶ Similarly, in Turkey, Parteks invested in a new paper machine in 2021 to increase its corrugated carboard paper (including corrugated pizza boxes) annual production capacity to 240,000 tons.¹⁴⁷ Moreover, while Petitioners do not have access to data regarding the subject producers’ internal operations, including levels of inventories, it is reasonable, especially in light of their growing and unused capacity, that subject producers and their U.S. importers maintain significant inventories.

b. *Subject Producers are Structurally Reliant on Exports to the United States*

Subject producers will undoubtedly continue to send large volumes of subject merchandise to the United States because they are heavily reliant on exports and, particularly, on U.S. sales. In Malaysia, Lopie Group, which includes Lopie Malaysia, exports to over 20 countries, with main

¹⁴⁵ *Product prices are falling! Capacity utilization is only 70%*, Baidu (July 25, 2025), attached as **Exhibit I-22**.

¹⁴⁶ *Export-Import Bank of China Zhejiang Branch supports private enterprises in “going global” and promoting the optimization of global production capacity layout*, Xinhua News Agency (Mar. 13, 2025), attached as **Exhibit I-23**.

¹⁴⁷ *About Us*, Parteks Website Excerpt, attached as **Exhibit I-24**.

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clients “primarily in the United States”, among others.¹⁴⁸ In China, Zhejiang Qianlin Packaging Technology Co., Ltd. (“Qialin Packaging”) made clear that its operations are geared towards North America.¹⁴⁹ Shandong Xinxinghua Environmental Protection Technology Materials Co., Ltd. (“Xinxinghua”) emphasizes its participation in more than 80 countries, and its culture of welcoming clients “from all over the world to cooperate with us on basis of long-term mutual benefits”.¹⁵⁰ Gaoyi also mentions that it is a “leading international enterprise,” and as mentioned above it maintains excess production capacity.¹⁵¹ In Turkey, Ankutsan A.S. (“Ankutsan”), a producer with four plants and 421,000 tons per year of corrugated cardboard sheet and box production,¹⁵² emphasizes that it exports to more than 60 countries,¹⁵³ and its general manager Deniz Erdogan mentioned that the company exported approximately \$38.9 million in 2020, and “aim for an export figure of 60 million dollars.”¹⁵⁴ Moreover, the growing volumes of imports from the subject origins indicate that Chinese, Malaysia, and Turkish producers increasingly rely on sales to the United States. Therefore, it is highly likely that foreign producers will ship further volumes to the United States in the future given their reliance on the U.S. market.

5. Foreign Production Facilities Could Shift Production from Other Products to Corrugated Pizza Boxes

In analyzing the threat of material injury, the Commission must consider “the potential for product-shifting if production facilities in the foreign country, which can be used to produce the

¹⁴⁸ Lopie Group, *Steady progress leads to long-term success, and further achievements are made*, attached as **Exhibit I-25**.

¹⁴⁹ *Market*, Qialin Packaging Website Excerpt (last accessed Jan. 22, 2026), attached as **Exhibit I-26**.

¹⁵⁰ Xinxinghua Website Excerpt (last accessed Jan. 22, 2026), attached as **Exhibit I-27**.

¹⁵¹ GaoYi Website Excerpt (last accessed Jan. 22, 2026), attached as **Exhibit I-28**.

¹⁵² *Factories*, Ankutsan Website Excerpt, attached as **Exhibit I-29**.

¹⁵³ *Pizza Boxes*, Ankutsan Website Excerpt, attached as **Exhibit I-30**.

¹⁵⁴ *Record Growth in Exports from Ankutsan*, Ankutsan Website Excerpt, attached as **Exhibit I-31**.

PUBLIC VERSION

subject merchandise, are currently being used to produce other products.”¹⁵⁵ Most corrugated pizza boxes producers also produce out-of-scope merchandise, including corrugated cardboard boxes, e-commerce boxes, among others.¹⁵⁶ Thus, foreign producers can easily shift operations away from other products to produce corrugated pizza boxes if trade relief is not afforded the domestic industry.

6. Subject Imports Frustrate the Development and Production Efforts of the Domestic Industry

As part of its threat analysis, the Commission also considers “the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product.”¹⁵⁷ As discussed above, dumped and subsidized subject imports have deteriorated the domestic industry’s financial performance. Part of the injury suffered by U.S. producers is caused by the fact that unfairly traded subject imports frustrate the industry’s development efforts and prevent achieving necessary returns on new investments. During the POI, the domestic industry made significant capital investments, seeking to optimize and modernize its operations.¹⁵⁸ And U.S. producers’ capital expenditures exceeded \$[] each year from 2023 to 2025.¹⁵⁹

However, as subject imports pressured the market throughout the POI, U.S. producers could not invest as heavily, with capital expenditures declining []% across the POI. This trend sharpened during the interim period, when subject imports started to have the most consequential

¹⁵⁵ 19 U.S.C § 1677(7)(F)(i)(VI).

¹⁵⁶ See, e.g., *Sectors*, Parteks Website Excerpt (last accessed July 28, 2026), attached as **Exhibit I-32**.

¹⁵⁷ 19 U.S.C. § 1677(7)(F)(i)(VIII).

¹⁵⁸ See, e.g., Katie Pyzyk, *Automation takes center stage at Smurfit Westrock ‘superplant’ in Wisconsin*, Packaging Dive (May 7, 2026), attached as **Exhibit I-21**.

¹⁵⁹ Domestic Industry Trade & Financial Data, attached as **Exhibit I-4**.

RANGED**PUBLIC VERSION**

impact on the industry's financial performance. Then, U.S. producers invested even less, reducing their capital expenditures by [**50**].¹⁶⁰ That is, in an increasingly weakened position, it is harder for U.S. producers to justify investments in new capital expenditures or research and development efforts. Going forward, this will delay the industry's ability to develop new products and continue to modernize its operations.

¹⁶⁰ *Id.*

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V. **CONCLUSION**

The statutory factors support a finding that imports of corrugated pizza boxes from China, Malaysia, and Turkey have caused material injury to the domestic industry, and that such imports threaten additional material injury. Accordingly, Petitioners request that the Department and the Commission initiate investigations and grant the relief requested in these petitions.

Respectfully submitted,

/s/ Robert E. DeFrancesco, III

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September 9, 2026

RANGED**PUBLIC VERSION**

EXHIBIT LIST		
EXHIBIT NO.	DESCRIPTION	SECURITY
I-1	Official U.S. Import Statistics	Public
I-2	Market Share Analysis	Public Version
I-3	Lost Sales and Lost Revenue Data	Public Version
I-4	Domestic Industry Trade & Financial Data	Public Version
I-5	USW Support Letter	Public Version
I-6	Additional Domestic Producers	Public
I-7	Domestic Industry Support Calculation	Public Version
I-8	Packaging Corporation of America Support Letter	Public Version
I-9	Declaration of Donald Roy	Public
I-10	Declaration of [<i>name</i>]	Public Version
I-11	Corrugated Flute Types	Public
I-12	<i>Inventory of Food Contact Substances Listed in 21 CFR, U.S. Food & Drug Administration (Apr. 16, 2021)</i>	Public
I-13	Smurfit Westrock Print Cards	Public Version
I-14	HTSUS Chapter 48	Public
I-15	List of Known Foreign Producers	Public
I-16	List of Known U.S. Importers	Public
I-17	[<i>company name</i>]	Public Version
I-18	Negligibility Calculation	Public
I-19	Katie Pyzyk, <i>Smurfit Westrock to close Atlanta plant, affecting 55 workers</i> , Packaging Dive (Nov. 10, 2025)	Public

PUBLIC VERSION

EXHIBIT LIST		
EXHIBIT NO.	DESCRIPTION	SECURITY
I-20	Trea Lavery, <i>Packaging Manufacturer to lay off 91, close Mass. Facility</i> , Yahoo! Finance (Mar. 23, 2026)	Public
I-21	Katie Pyzyk, <i>Automation takes center stage at Smurfit Westrock 'superplant' in Wisconsin</i> , Packaging Dive (May 7, 2026)	Public
I-22	<i>Product prices are falling! Capacity utilization is only 70%</i> , Baidu (Jul. 25, 2025)	Public
I-23	<i>Export-Import Bank of China Zhejiang Branch supports private enterprises in "going global" and promoting the optimization of global production capacity layout</i> , Xinhua News Agency (Mar. 13, 2025)	Public
I-24	<i>About Us</i> , Parteks Website Excerpt	Public
I-25	Lopie Group, <i>Steady progress leads to long-term success, and further achievements are made</i>	Public
I-26	<i>Market</i> , Qialin Packaging Website Excerpt (last accessed Jan. 22, 2026)	Public
I-27	Xinxinghua Website Excerpt	Public
I-28	GaoYi Website Excerpt	Public
I-29	<i>Factories</i> , Ankutsan Website Excerpt	Public
I-30	<i>Pizza Boxes</i> , Ankutsan Website Excerpt	Public
I-31	<i>Record Growth in Exports from Ankutsan</i> , Ankutsan Website Excerpt	Public
I-32	<i>Sectors</i> , Parteks Website Excerpt (last accessed July 28, 2026)	Public

EXHIBIT I-1

Official U.S. Import Statistics of Corrugated Pizza Boxes

Source	Measure	2023	2024	2025	Jan-Jun 2025	Jan-Jun 2026	2023-25	2023-24	2024-25	1H 25 - 1H 26
China	pounds	25,446,914	29,744,815	17,392,087	10,588,062	6,011,076	(31.7)	16.9	(41.5)	(43.2)
Turkey	pounds	14,770,251	29,372,348	61,552,083	24,678,378	35,487,799	316.7	98.9	109.6	43.8
Malaysia	pounds	22,778	4,016,269	13,412,701	2,491,455	13,718,487	58784.5	17532.2	234.0	450.6
Subject sources	pounds	40,239,943	63,133,432	92,356,871	37,757,895	55,217,362	129.5	56.9	46.3	46.2
Nonsubject sources	pounds	27,834,004	33,283,479	62,756,971	27,061,079	34,821,419	125.5	19.6	88.6	28.7
All import sources	pounds	68,073,947	96,416,911	155,113,842	64,818,974	90,038,781	127.9	41.6	60.9	38.9
China	LDPV	\$20,902,848	\$20,976,966	\$14,224,095	\$8,573,612	\$3,514,637	(32.0)	0.4	(32.2)	(59.0)
Turkey	LDPV	\$12,297,382	\$23,554,770	\$45,632,975	\$17,158,590	\$24,603,473	271.1	91.5	93.7	43.4
Malaysia	LDPV	\$16,088	\$2,520,935	\$8,423,546	\$1,562,048	\$8,114,216	52259.2	15569.7	234.1	419.5
Subject sources	LDPV	\$33,216,318	\$47,052,671	\$68,280,616	\$27,294,250	\$36,232,326	105.6	41.7	45.1	32.7
Nonsubject sources	LDPV	\$23,613,991	\$26,405,386	\$50,389,248	\$21,578,234	\$30,702,329	113.4	11.8	90.8	42.3
All import sources	LDPV	\$56,830,309	\$73,458,057	\$118,669,864	\$48,872,484	\$66,934,655	108.8	29.3	61.5	37.0
China	\$ per lb	\$0.82	\$0.71	\$0.82	\$0.81	\$0.58	(0.4)	(14.1)	16.0	(27.8)
Turkey	\$ per lb	\$0.83	\$0.80	\$0.74	\$0.70	\$0.69	(11.0)	(3.7)	(7.6)	(0.3)
Malaysia	\$ per lb	\$0.71	\$0.63	\$0.63	\$0.63	\$0.59	(11.1)	(11.1)	0.1	(5.7)
Subject sources	\$ per lb	\$0.83	\$0.75	\$0.74	\$0.72	\$0.66	(10.4)	(9.7)	(0.8)	(9.2)
Nonsubject sources	\$ per lb	\$0.85	\$0.79	\$0.80	\$0.80	\$0.88	(5.4)	(6.5)	1.2	10.6
All import sources	\$ per lb	\$0.83	\$0.76	\$0.77	\$0.75	\$0.74	(8.4)	(8.7)	0.4	(1.4)

Source: USITC Dataweb HS 4819.10.0020.

EXHIBIT I-2

Market Share Analysis of U.S. Corrugated Pizza Boxes Industry

Source	Measure	2023	2024	2025	Jan-Jun 2025	Jan-Jun 2026	2023-25	2023-24	2024-25	1H 25 - 1H 26
U.S. producers	pounds								-5.0	
China	pounds	25,446,914	29,744,815	17,392,087	10,588,062	6,011,076	(31.7)	16.9	(41.5)	(43.2)
Turkey	pounds	14,770,251	29,372,348	61,552,083	24,678,378	35,487,799	316.7	98.9	109.6	43.8
Malaysia	pounds	22,778	4,016,269	13,412,701	2,491,455	13,718,487	58784.5	17532.2	234.0	450.6
Subject sources	pounds	40,239,943	63,133,432	92,356,871	37,757,895	55,217,362	129.5	56.9	46.3	46.2
Nonsubject sources	pounds	27,834,004	33,283,479	62,756,971	27,061,079	34,821,419	125.5	19.6	88.6	28.7
All import sources	pounds	68,073,947	96,416,911	155,113,842	64,818,974	90,038,781	127.9	41.6	60.9	38.9
All sources	pounds									
U.S. producers	share									
China	share									
Turkey	share			7.0						3.0
Malaysia	share									
Subject sources	share									
Nonsubject sources	share									
All import sources	share						8.5			
All sources	share	100.0	100.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0

Source: USITC Dataweb HS 4819.10.0020 and data provided by Packaging Corporation of America, Pratt, and Smurfit Westrock.

EXHIBIT I-3

ENTIRE EXHIBIT NOT CAPABLE OF PUBLIC SUMMARY

EXHIBIT I-4

Domestic Industry Trade & Financial Data

Item	Measure	2023	2024	2025	H1 2025	H1 2026	2023-25	2023-24	2024-25	H1 '25 - H1 '26
Average capacity (units)	1,000 sq ft						10.0			
Production (units)	1,000 sq ft									
Capacity utilization (percent)	percent									
Total U.S. shipments (units)	1,000 sq ft									-3.0
Total U.S. shipments (\$1,000)	\$1,000									
Total U.S. shipments AUV	\$/sq ft									
Export shipments (units)	1,000 sq ft									
Export shipments (\$1,000)	\$1,000									
Export shipments AUV	\$/sq ft									
Production workers	number								-22.0	
Hours worked (1,000 hours)	1,000 hours									
Wages paid (\$1,000s)	\$1,000									
Net sales (units)	1,000 sq ft									
Net sales (\$1,000)	\$1,000									
Net sales AUV	\$/sq ft									
COGS (\$1,000)	\$1,000									
Gross profit or (loss) (\$1,000)	\$1,000									
SG&A expenses (\$1,000)	\$1,000									
Operating income or (loss) (\$1,000)	\$1,000									
Net income or (loss) (\$1,000)	\$1,000									
Total assets(\$1,000)	\$1,000									
Capital expenditures (\$1,000)	\$1,000						-5.0			
Research and development expenses (\$1,000)	\$1,000									
Unit COGS	\$/sq ft									
Unit SG&A	\$/sq ft									
Unit operating income or (loss)	\$/sq ft									
Unit net income or (loss)	\$/sq ft									
COGS / sales (percent)	percent							3.0		
Gross Profit or (loss) / sales (percent)	percent									
Operating income or (loss) / sales (percent)	percent									
Net income or (loss) / sales (percent)	percent									

Source: Data provided by Packaging Corporation of America, Pratt, and Smurfit Westrock.

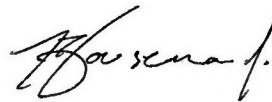
EXHIBIT I-5

DECLARATION

Roy Houseman declares and states that:

1. I am the Legislative Director of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (“USW”), North America’s largest industrial union and a petitioner in the antidumping and countervailing duty trade cases against imports of corrugated pizza boxes from the People’s Republic of China, Malaysia, and the Republic of Türkiye.
2. USW members include corrugated pizza box production facilities operated by fellow petitioner Smurfit Westrock plc in the following cities: [
Locations
].
3. USW members also include corrugated pizza box production facilities operated by domestic producers of corrugated pizza boxes, such as Packaging Corporation of America and Hood Container Corporation.
4. The text surrounded by brackets contains business proprietary information, the release of which would cause serious commercial harm to the submitter.
5. I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge, the foregoing is true and correct.

Executed September 6, 2026 in Washington, DC.



Roy Houseman

Assistant to the President &
Legislative Director,
*United Steel, Paper and Forestry,
Rubber, Manufacturing, Energy,
Allied Industrial and Service
Workers International Union*

EXHIBIT I-6

Non-Petitioner U.S. Producers of In-Scope Merchandise				
Company Name	Address	E-Mail	Phone Number	Website
Alpha Packaging	2020 East Center Street, Greenwood, AR 72936	Info@alpkg.com	(479) 996-2829	https://www.alphapackaging.com/
Arvco Container Corp.	845 Gibson Street, Kalamazoo, MI 49001	arvcocs@arvco.com	(800) 968-9128	https://arvco.com/
Brown Packaging	1990 W Corporate Way, Anaheim, CA 92801	request@brownpackaging.com	(714) 300-0650	https://brownpackaging.com/
Enterprise Folding Box Co.	75 Isabelle Street, Buffalo, NY 14207	llodestro@enterprisebox.com	(716) 876-6421 / (800) 541-6793	https://www.enterprisebox.com/
Freeport Paper Industries	120 Windsor Place, Central Islip, NY, 11722	fpaper@optonline.net	(631) 851-1555	https://www.freeportpaper.com/
Hood Container Corporation	2100 Riveredge Parkway, Suite 650, Atlanta, GA 30328	info@hoodcontainer.com	(855) 605 6317	https://hoodcontainer.com/
New Method Packaging	1805 Commerce Road, Springfield, Ohio 45504	sales@newmethodpackaging.com	(937) 324-3838	https://newmethodpackaging.com/
Packaging Atlanta	291 N. Industrial Way, Canton, GA 30115	sales@pkgatl.com	(770) 345-7144	https://www.pkgatl.com/
Packaging Corporation of America	1 North Field Court, Lake Forest, IL 60045	EllisCunningham@packagingcorp.com	(800) 456-4725	https://www.packagingcorp.com/
Silver Edge Packaging	701 Koll Center Parkway, Pleasanton, CA 94566	Sales@silveredgepackaging.com	(888) 507-2025	https://www.silveredgepackaging.com/
Southern Champion Tray	220 Compress Street, Chattanooga, TN 37405	info@sctray.com	(423) 756-5121 / (800) 468-2222	https://www.sctray.com/en/
The Custom Boxes	9933 Franklin Avenue, Franklin Park, IL 60131	support@thecustomboxes.com	(800) 396-1840 / (630) 364-3944	https://www.thecustomboxes.com/

EXHIBIT I-7

Domestic Industry Support Calculation

Item	2025 Shipments (lbs)	
U.S. consumption of food service boxes	1,260,000,000	a
U.S. imports of food service boxes	155,113,842	b
U.S. shipments of food service boxes	1,104,886,158	c = a-b
Smurfit Westrock shipments of food service boxes		d
Pratt shipments of food service boxes		e
Subtotal, Petitioners	900,000,000	f = d+e
Petitioners' Share		g = f/c
PCA shipments of pizza boxes		h
Subtotal, Supporting Producers		i = f + h
Supporting Producers' Share	83.0%	j = i/c

Source: Domestic Producers' Trade & Financial Data;
USITC Dataweb HS 4819.10.0020;
Declaration of Ellis Cunningham;
Declaration of Donald Roy;
<https://www.afandpa.org/news/2025/pizza-box-recyclable>

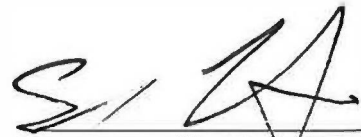
EXHIBIT I-8

DECLARATION

Ellis Cunningham declares and states that:

1. I am the Vice President & General Counsel of Packaging Corporation of America ("PCA"). PCA is a producer of pizza boxes and [*Production Description and Location*].
2. PCA supports the antidumping and countervailing duty petitions on pizza boxes from China, Malaysia, and Turkey.
3. In my capacity as Vice President and General Counsel, I am aware of the company's production, sales, and financial information. Specifically, in 2025, I am aware that PCA produced [] square feet of pizza boxes and had [] pounds of U.S. shipments.
4. The text surrounded by brackets contains business proprietary information, the release of which would cause serious commercial harm to the submitter.
5. I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge, the foregoing is true and correct.

Executed August 31, 2026 in Boise, Idaho.



Ellis Cunningham
Vice President & General Counsel
Packaging Corporation of
America

EXHIBIT I-9

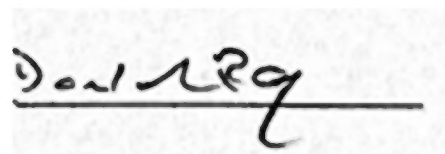
DECLARATION

I, Donald Roy, state as follows:

1. I am the former Senior Director of Foodservice Sales at Smurfit Westrock, the largest producer of food service boxes in United States. Prior to that, I was Vice President of Corporate Sales and Vice President of Sales for the Northeast Area. I retired from my position as Senior Director of Foodservice Sales on December 31, 2022, after being with the company for 50 years. I started with the company out of college in customer service and sales, and I was with the company when the U.S. market first shifted to corrugated food services boxes primarily for pizza carry out and delivery (comprising two flat outer and inner liners sandwiching a fluted, wavy middle layer) in the early 1980s.
2. I am familiar with the scope of these petitions which cover certain corrugated food service boxes ("food service boxes"). Based on my experience in the industry, approximately 95% of the food service boxes covered by the scope of these petitions are pizza boxes. The remaining 5% are largely comprised of certain sides, sandwich, and catering boxes.
3. In my capacity leading the food service division at Smurfit, I tracked the overall size of the U.S. market for pizza and other food service boxes and the company's approximate share of the U.S. market relative to other U.S. producers and importers. I keep apprised of industry news and developments, and because I have several decades of institutional knowledge, I am occasionally called upon by Smurfit Westrock's leadership for consultation.
4. There is no industry publication that tracks the annual production of food service boxes in the United States. Annual U.S. consumption of food service boxes for pizza is approximately three billion units, representing about 600,000 tons of corrugated cardboard consumption a year. As noted above, this figure represents approximately 95% of all food service boxes that meet the description of the scope, so if you increase that figure by 5% (to 630,000 tons) and subtract annual imports, what is left is an approximate total for annual U.S. production of food service boxes of a certain types and size.
5. In the years prior to my retirement, Smurfit Westrock accounted for over half of all U.S. production of food service boxes that meet the type and size identified. To my knowledge, that remains true, including for 2025.
6. I have attached two industry publications to this declaration which I believe to be relevant and accurate. **Attachment 1** is a recent article from the American Forest & Paper Association dated October 2025. **Attachment 2** is current guidance regarding pizza box recycling from Domino's – the largest pizza chain in the world and the United States. Both sources confirm the size of the U.S. market for food service boxes for pizza noted above, *i.e.*, three billion units or 600,000 tons. As noted above, this figure comprises 95% of annual consumption of food service boxes that meet the scope parameters.

7. To be clear, my estimate of Smurfit Westrock's share of U.S. production of food service boxes is conservative because the denominator (*i.e.*, estimated annual U.S. production calculated by subtracting annual imports from annual U.S. consumption) is inflated by the output of U.S. processors engaged in simple cutting and folding operations. Smurfit Westrock's share of actual production of food service boxes – for which the vast majority of production-related activity occurs before cutting and folding – is therefore significantly greater than my conservative estimates.
8. As noted above, I was with the company when the market shifted from thin cardboard sheets or paperboard bakery boxes to corrugated food service boxes. This shift required U.S. producers of these boxes to make significant capital outlays in new types of machinery and equipment.
9. The production of food service boxes involves several complex and capital-intensive steps before cutting and folding, including but not limited to the following: (1) manufacturing paper and/or paperboard materials; (2) rolling multiple sheets of paper through a corrugator, creating multi-layer fluted sheets or blanks; (3) gluing the inner and outer layer together; and (4) applying coatings and printing graphical images.
10. Smurfit Westrock is an integrated producer, so the company manufactures its own paper and/or paperboard materials. Some other U.S. producers of food service boxes purchase paper or paperboard materials, which they use to manufacture corrugated cardboard sheets. But from an industry perspective, companies that simply cut and fold pre-made corrugated cardboard sheets are not actual manufacturers of corrugated cardboard food service boxes. The investment those companies made in cutting and folding operations pale in comparison to the investments I saw U.S. producers like Smurfit Westrock make over the years in manufacturing corrugated cardboard for food service boxes.
11. I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge, the foregoing is true and correct.

Executed September 4, 2026 in Methuen, MA.

A handwritten signature in black ink, appearing to read "Donald Roy", is written over a horizontal line.

Donald Roy

57 Pine Tree Drive
Methuen, MA 01844

ATTACHMENT 1



**American
Forest & Paper
Association**



HOME > NEWS > IS A PIZZA BOX RECYCLABLE?

OCTOBER 23, 2025 | RECYCLING Q&A

Is a Pizza Box Recyclable?

Yes, If You Recycle It Right

Pizza night is a favorite in many households. But when the last slice is gone, you might wonder, can that greasy pizza box go in the recycling bin? Good news: *yes, it can.*

A study found that typical amounts of grease and cheese on pizza boxes are not a problem for paper mills. In fact, paper mills want these boxes back to recycle them—*as long as you finish that pizza first!*

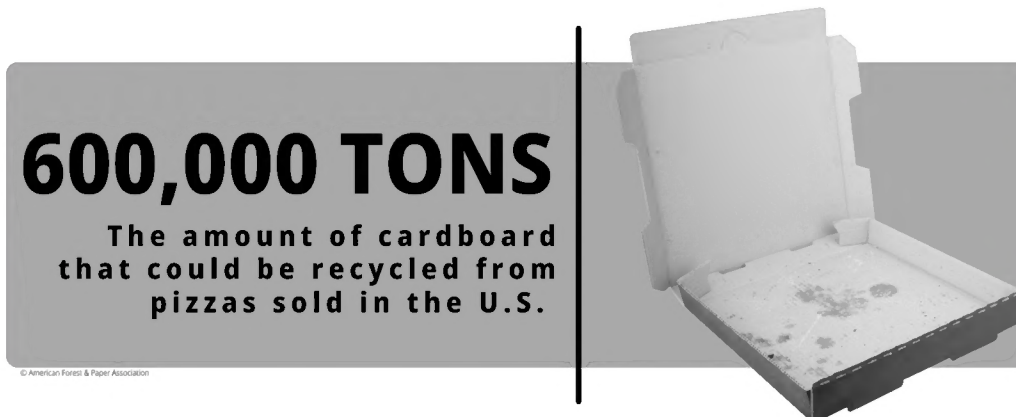
Before you toss your pizza box in the recycling bin, **here's what to do:**

- Remove leftover pizza slices or crusts
- Remove any liners, plastic supports or dipping cups



That's it! The spots with **grease and little bits of cheese can stay**. Paper mills are equipped to handle it.

Why Recycling Pizza Boxes Matters



Each year, about **3 billion** pizza boxes are used in the U.S. That adds up to about **600,000 tons of cardboard**, a big opportunity for recycling. Yet not all of it gets collected. That's because there's still some confusion about whether pizza boxes can be recycled.

Here are the facts:

- **82% of Americans** have access to a community recycling program that accepts pizza boxes
- Some communities may have contracts with recycling services that don't take pizza boxes

What does that mean for you? First, it's always a good idea to **check your local guidelines**. When you recycle right, you help make the system work better for everyone.

If your recycling program doesn't accept pizza boxes, share our guidance with your local government or recycling hauler to help explain why they should.

RECYCLING

PACKAGING



The American Forest & Paper Association (AF&PA) serves to advance public policies that foster economic growth, job creation and global competitiveness for a vital sector that makes the essential paper and packaging products Americans use every day. The U.S. forest products industry employs more than 925,000 people, largely in rural America, and is among the top 10 manufacturing sector employers in 44 states. Our industry accounts for approximately 4.7% of the total U.S. manufacturing GDP, manufacturing more than \$435 billion in products annually. AF&PA member companies are significant producers and users of renewable biomass energy and are committed to making sustainable products for a sustainable future through the

*industry's decades-long initiative —
Better Practices, Better Planet 2030.*

RELATED NEWS

RECYCLING | EPR

AF&PA Responds to Court Decision Blocking Enforcement of California SB 343

American Forest & Paper Association (AF&PA) Vice President of Government Affairs Julie Landry released the following statement on a federal judge granting a preliminary injunction that blocks California from enforcing SB 343.

RECYCLING

Can You Recycle Shredded Paper?

Yes, shredded paper can be recycled. Follow local rules. Paper mills can recycle shredded paper.

EPR | RECYCLING

AF&PA Opposes Amendments to New York's Packaging Reduction and Recycling Infrastructure Act

AF&PA has opposed PRRIA from the outset, and the proposed amendments only worsen the bill's fundamental flaws. The legislation continues to raise serious affordability concerns for New York families and businesses without delivering meaningful paper recycling benefits.

VIEW ALL NEWS



**American
Forest & Paper
Association**

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202-463-2700

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ATTACHMENT 2



FIND YOUR LOCAL RECYCLING GUIDELINES

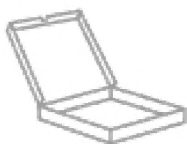
Enter your 5 digit zip code

SEARCH

UNBOXING THE FACTS

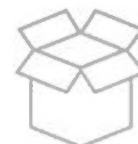
We're making progress, but there's still work to do. Here are some stats on pizza box recycling:

72%



In 2020, Domino's increased its percentage of recycled content from 40% to 72%

7x



Pizza boxes are made of high-quality corrugated paper, which can be recycled at least seven times.

- AMERICAN FOREST & PAPER ASSOCIATION (AF&PA)

94%



AF&PA member companies representing 94 percent of the total annual U.S. old corrugated containers (OCC) consumption accept pizza boxes.

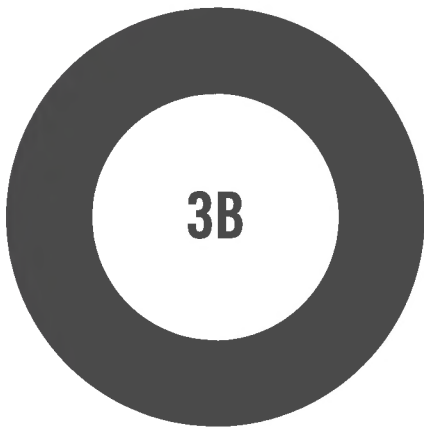
79%



Corrugated pizza boxes are recyclable, however, approximately 79% of municipal recycling programs do not have clear acceptance guidelines for corrugated pizza box recycling.

WE'RE UNCOVERING THE FACTS AND SHARING THEM WITH YOU!

PIZZA BOX RECYCLING



PIZZA BOXES USED EACH YEAR IN THE U.S.

There are approximately 3 billion pizza boxes used in the U.S., annually, which represents 600,000 tons of highly desired corrugated material that should be recycled and not needlessly wasted.

There is great inconsistency and confusion regarding the recyclability of pizza boxes. Pizza boxes are technically recyclable. They are made from the same material as a corrugated box, which has an average recovery rate for recycling of 92%. However, in the past, some paper mills and others in the recycling industry have expressed concerns about accepting them because of fear of food contamination.

These concerns have contributed to mixed messages as to whether they are recyclable. Recent press articles about contamination in the recycling stream have often highlighted pizza boxes as a contaminant and have enforced the belief they should not be recycled. An industry study found that grease and cheese residue at typical levels did not have a significant impact on recyclability of pizza boxes. In reality, the majority of recycling programs and paper mills accept them without any problems. Read the study summary.

There are approximately 3 billion pizza boxes used in the U.S., which represents an estimated 600,000 tons of highly desired corrugated material that should be recycled and not needlessly wasted.

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EXHIBIT I-10

DECLARATION

[*Name*] declares and states that:

1. I am employed as a [*Title*] U.S. domestic manufacturer of corrugated pizza boxes ("*Company* pizza boxes") and is the [*narrative*

[*year*] I have been [*;*] of experience in the [*;*] industries.

2. In my capacity as a [*title*], I am familiar with the marketplace for pizza boxes in the United States. I am familiar with how pizza boxes are sold, how they are distributed, and customers' preferences for pizza boxes. Further, I am familiar with the efforts of pizza box manufacturers and exporters located in China, Malaysia, and Turkey to penetrate the U.S. market for pizza boxes. On a [*narrative*] U.S. domestic market for pizza boxes [*;*] My company as well as [*narrative*] on a daily basis.

3. Domestic pizza box manufacturers generally sell pizza boxes in the U.S. market based on several factors including 1) the physical dimensions of the box, 2) the wall thickness of the corrugated board (fluting) of the box ("B" fluting and "E" fluting being the most common), 3) whether the box contains specialty printing or graphics, 4) whether the box uses white (bleached) paperboard or unbleached (kraft) paper board on the exterior faces of the box, and 5) whether the box contains any specialized features (e.g., grease resistant paper, non-square shape). Foreign producers and exporters follow similar guidelines when offering products to customers in the United States.

4. In the United States, pizza boxes are sold through several channels of distribution including through 1) distributors, 2) food service companies, 3) restaurant supply warehouses, or 4) directly to restaurants and restaurant chains (either through company-controlled distribution warehouses or directly to a storefront).

5. Distribution and food service companies are the most common channels of sales for pizza boxes. *Company* of one company that resells pizza boxes sourced from overseas. Companies like [*;*] take delivery of pizza boxes from Chinese, Malaysian, and Turkish sources, place them into warehouses [*;*], and then resell them to retailers or lower level distributors / food service companies. In doing so, [*Company*]].

6. The text surrounded by square brackets in this affidavit contains business proprietary information, the release of which would cause serious commercial harm to the submitter.

7. I declare under penalty of perjury under the laws of the United States that to the best of my knowledge the foregoing is true and correct.

Executed August 20, 2026 in [*City, State*].

[*Signature*]

[*Name*]

EXHIBIT I-11

CORRUGATED FLUTE TYPES & NOMINAL THICKNESSES

Nominal flute thicknesses (per your specification)

B FLUTE



Nominal flute thickness

B FLUTE

0.125" (1/8")
3.18 mm

C FLUTE



Nominal flute thickness

C FLUTE

0.160" (4/25")
4.06 mm

D FLUTE



Nominal flute thickness

D FLUTE

0.09375" (3/32")
2.38 mm

E FLUTE



Nominal flute thickness

E FLUTE

0.0625" (1/16")
1.59 mm

FLUTE TYPE	NOMINAL FLUTE THICKNESS (in)	FRACTIONAL EQUIVALENT	NOMINAL FLUTE THICKNESS (mm)
B FLUTE	0.125"	1/8"	3.18 mm
C FLUTE	0.160"	4/25"	4.06 mm
D FLUTE	0.09375"	3/32"	2.38 mm
E FLUTE	0.0625"	1/16"	1.59 mm

Note: Nominal values only. Actual board caliper may vary based on liner and medium combination.

EXHIBIT I-12

Inventory of Food Contact Substances Listed in 21 CFR

This database contains an inventory of substances authorized in Title 21 of the U.S. Code of Federal Regulations (21 CFR) for uses in contact with foods. The database contains information on the substance identity and listed FDA regulations for the specific intended uses and use conditions authorized. The listing includes Food Contact Substances (FCS ([/food/food-ingredients-packaging/food-ingredient-packaging-terms](#))) including indirect food additives listed under 21 CFR Parts 175-178, 179.45, and 180.22 as well as secondary direct additives listed in 21 CFR 173, prior-sanctioned food ingredients listed in 21 CFR 181, and substances affirmed as generally recognized as safe listed in 21 CFR 186. ¹

The inventory also contains information on substances listed in 21 CFR 189 that are prohibited from use as food contact substances.

In addition to ingredients authorized and listed in 21 CFR, FDA maintains separate inventories for premarket authorizations for food contact substances issued under the [Food Contact Substance Notification \(FCN\)](#) (<https://www.cfsanappsexternal.fda.gov/scripts/fdcc/index.cfm?set=FCN>) and [Threshold of Regulation Exemptions \(TOR\)](#) (<https://www.cfsanappsexternal.fda.gov/scripts/fdcc/index.cfm?set=TOR>) programs.

For further details to help determine the regulatory status of substances used in food contact applications, visit "[Determining the Regulatory Status of Components of a Food Contact Material](#) ([/food/packaging-food-contact-substances-fcs/determining-regulatory-status-components-food-contact-material](#))."

Launch the Database (<https://www.cfsanappsexternal.fda.gov/scripts/fdcc/?set=IndirectAdditives>)

¹ The inventory does not include substances affirmed as generally recognized as safe for direct addition to food listed in 21 CFR 184. These are listed in the [Substances Added to Food \(formerly EAFUS\)](#) (<https://www.cfsanappsexternal.fda.gov/scripts/fdcc/?set=FoodSubstances>) database.

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EXHIBIT I-13

ENTIRE EXHIBIT NOT CAPABLE OF PUBLIC SUMMARY

EXHIBIT I-14

CHAPTER 48

PAPER AND PAPERBOARD; ARTICLES OF PAPER PULP,
OF PAPER OR OF PAPERBOARD

X
48-1

Notes

1. For the purposes of this chapter, except where the context otherwise requires, a reference to "paper" includes references to paperboard (irrespective of thickness or weight per m²).
2. This chapter does not cover:
 - (a) Articles of chapter 30;
 - (b) Stamping foils of heading 3212;
 - (c) Perfumed papers or papers impregnated or coated with cosmetics (chapter 33);
 - (d) Paper or cellulose wadding impregnated, coated or covered with soap or detergent (heading 3401), or with polishes, creams or similar preparations (heading 3405);
 - (e) Sensitized paper or paperboard of headings 3701 to 3704;
 - (f) Paper impregnated with diagnostic or laboratory reagents (heading 3822);
 - (g) Paper-reinforced stratified sheeting of plastics, or one layer of paper or paperboard coated or covered with a layer of plastics, the latter constituting more than half the total thickness, or articles of such materials, other than wallcoverings of heading 4814 (chapter 39);
 - (h) Articles of heading 4202 (for example, travel goods);
 - (ij) Articles of chapter 46 (manufactures of plaiting material);
 - (k) Paper yarn or textile articles of paper yarn (section XI);
 - (l) Articles of chapter 64 or chapter 65;
 - (m) Abrasive paper or paperboard (heading 6805) or paper- or paperboard-backed mica (heading 6814) (paper and paperboard coated with mica powder are, however, to be classified in this chapter);
 - (n) Metal foil backed with paper or paperboard (generally section XIV or XV);
 - (o) Articles of heading 9209;
 - (p) Articles of chapter 95 (for example, toys, games, sports requisites); or
 - (q) Articles of chapter 96 (for example, buttons, sanitary pads (towels) and tampons, diapers (napkins) and diaper liners).
3. Subject to the provisions of note 7, headings 4801 to 4805 include paper and paperboard which have been subjected to calendering, super-calendering, glazing or similar finishing, false water-marking or surface sizing, and also paper, paperboard, cellulose wadding and webs of cellulose fibers, colored or marbled throughout the mass by any method. Except where heading 4803 otherwise requires, these headings do not apply to paper, paperboard, cellulose wadding or webs of cellulose fibers which have been otherwise processed.
4. In this chapter, the expression "newsprint" means uncoated paper of a kind used for the printing of newspapers, of which not less than 50 percent by weight of the total fiber content consists of wood fibers obtained by a mechanical or chemi-mechanical process, unsized or very lightly sized, having a surface roughness Parker Print Surf (1 MPa) on each side exceeding 2.5 micrometers (microns), weighing not less than 40 g/m² and not more than 65 g/m², and applies only to paper: (a) in strips or rolls of a width exceeding 28 cm; or (b) in rectangular (including square) sheets with one side exceeding 28 cm and the other side exceeding 15 cm in the unfolded state.

X
48-2
Notes (con.)

5. For the purposes of heading 4802, the expressions "paper and paperboard, of a kind used for writing, printing or other graphic purposes" and "nonperforated punch-cards and punch tape paper" mean paper and paperboard made mainly from bleached pulp or from pulp obtained by a mechanical or chemi-mechanical process and satisfying any of the following criteria:

(A) For paper or paperboard weighing not more than 150 g/m²:

(a) Containing 10% or more of fibers obtained by a mechanical or chemi-mechanical process, and

1. weighing not more than 80 g/m², or
2. colored throughout the mass; or

(b) Containing more than 8 percent ash, and

1. weighing not more than 80 g/m², or
2. colored throughout the mass; or

(c) Containing more than 3 percent ash and having a brightness of 60 percent or more; or

(d) Containing more than 3 percent but not more than 8 percent ash, having a brightness less than 60 percent and a burst index equal to or less than 2.5 kPa·m²/g; or

(e) Containing 3 percent ash or less, having a brightness of 60 percent or more and a burst index equal to or less than 2.5 kPa·m²/g.

(B) For paper or paperboard weighing more than 150 g/m²:

(a) Colored throughout the mass; or

(b) Having a brightness of 60 percent or more, and

1. a caliper of 225 micrometers (microns) or less, or
2. a caliper of more than 225 micrometers (microns) but not more than 508 micrometers (microns) and an ash content of more than 3 percent; or

(c) Having a brightness of less than 60 percent, a caliper of 254 micrometers (microns) or less and an ash content of more than 8 percent.

Heading 4802 does not, however, cover filter paper or paperboard (including teabag paper) or felt paper or paperboard.

6. In this chapter "kraft paper and paperboard" means paper and paperboard of which not less than 80 percent by weight of the total fiber content consists of fibers obtained by the chemical sulfate or soda processes.
7. Except where the terms of the headings otherwise require, paper, paperboard, cellulose wadding and webs of cellulose fibers answering to a description in two or more of the headings 4801 to 4811 are to be classified under that one of such headings which occurs last in numerical order in the tariff schedule.
8. Headings 4803 to 4809 apply only to paper, paperboard, cellulose wadding and webs of cellulose fibers:
- (a) In strips or rolls of a width exceeding 36 cm; or
- (b) In rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.
9. For the purposes of heading 4814, the expression "wallpaper and similar wall coverings" applies only to:
- (a) Paper in rolls, of a width of not less than 45 cm and not more than 160 cm, suitable for wall or ceiling decoration:
- (i) Grained, embossed, surface-colored, design-printed or otherwise surface-decorated (for example, with textile flock), whether or not coated or covered with transparent protective plastics;
- (ii) With an uneven surface resulting from the incorporation of particles of wood, straw, etc.;

Notes (con.)

(iii) Coated or covered on the face side with plastics, the layer of plastics being grained, embossed, colored, design-printed or otherwise decorated; or

(iv) Covered on the face side with plaiting material, whether or not bound together in parallel strands or woven;

(b) Borders and friezes of paper, treated as above, whether or not in rolls, suitable for wall or ceiling decoration;

(c) Wall coverings of paper made up of several panels, in rolls or sheets, printed so as to make up a scene, design or motif when applied to a wall.

Products on a base of paper or paperboard, suitable for use both as floor coverings and as wall coverings, are to be classified in heading 4823.

10. Heading 4820 does not cover loose sheets or cards, cut to size, whether or not printed, embossed or perforated.

11. Heading 4823 applies, inter alia, to perforated paper or paperboard cards for Jacquard or similar machines and paper lace.

12. Except for the articles of heading 4814 or 4821, paper, paperboard, cellulose wadding and articles thereof, printed with motifs, characters or pictorial representations, which are not merely subsidiary to the primary use of the goods, fall in chapter 49.

Subheading Notes

1. For the purposes of subheading 4804.11 and 4804.19, "kraftliner" means machine-finished or machine-glazed paper and paperboard, of which not less than 80 percent by weight of the total fiber content consists of wood fibers obtained by the chemical sulfate or soda processes, in rolls, weighing more than 115 g/m² and having a minimum Mullen bursting strength, as indicated in the following table, or the linearly interpolated or extrapolated equivalent for any other weight:

<u>Weight</u> <u>(g/m²)</u>	<u>Minimum Mullen bursting strength</u> <u>(kPa)</u>
115	393
125	417
200	637
300	824
400	961

2. For the purposes of subheadings 4804.21 and 4804.29, "sack kraft paper" means machine-finished paper, of which not less than 80 percent by weight of the total fiber content consists of fibers obtained by the chemical sulfate or soda processes, in rolls, weighing not less than 60 g/m² but not more than 115 g/m² and meeting one of the following sets of specifications:

(a) Having a Mullen burst index of not less than 3.7 kPa·m²/g and a stretch factor of more than 4.5 percent in the cross direction and of more than 2 percent in the machine direction.

(b) Having minima for tear and tensile as indicated in the following table, or the linearly interpolated equivalent for any other weight:

Weight	Minimum tear		Minimum tensile	
	Machine direction	Machine direction plus cross direction	Cross direction	Machine direction plus cross direction
<u>(grams per square meter)</u>	<u>(millinewtons)</u>		<u>(kilonewtons per meter)</u>	
60	700	1,510	1.9	6
70	830	1,790	2.3	7.2
80	965	2,070	2.8	8.3
100	1,230	2,635	3.7	10.6
115	1,425	3,060	4.4	12.3

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X

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Subheading Notes (con.)

3. For the purposes of subheading 4805.11, "semichemical fluting paper" means paper, in rolls, of which not less than 65 percent by weight of the total fiber content consists of unbleached hardwood fibers obtained by a combination of mechanical and chemical pulping processes, and having a CMT 30 (Corrugated Medium Test with 30 minutes of conditioning) crush resistance exceeding 1.8 newtons/g/m² at 50 percent relative humidity, at 23°C.
4. Subheading 4805.12 covers paper, in rolls, made mainly of straw pulp obtained by a combination of mechanical and chemical pulping processes, weighing 130 g/m² or more, and having a CMT 30 (Corrugated Medium Test with 30 minutes of conditioning) crush resistance exceeding 1.4 newtons/g/m² at 50 percent relative humidity, at 23°C.
5. Subheading 4805.24 and 4805.25 cover paper and paperboard made wholly or mainly of pulp recovered (waste and scrap) paper or paperboard. Testliner may also have a surface layer of dyed paper or of paper made of bleached or unbleached non-recovered pulp. These products have a Mullen burst index of not less than 2 kPa·m²/g.
6. For the purposes of subheading 4805.30, "sulfite wrapping paper" means machine-glazed paper, of which more than 40 percent by weight of the total fiber content consists of wood fibers obtained by the chemical sulfite process, having an ash content not exceeding 8 percent and having a Mullen burst index of not less than 1.47 kPa·m²/g.
7. For the purposes of subheading 4810.22, "light-weight coated paper" means paper, coated on both sides, of a total weight not exceeding 72 g/m², with a coating weight not exceeding 15 g/m² per side, on a base of which not less than 50 percent by weight of the total fiber content consists of wood fibers obtained by a mechanical process.

Additional U.S. Notes

1. For the purposes of this chapter the provisions for cellulose wadding and webs of cellulose fibers cover only products obtained from the pulp of chapter 47.
2. Samples used in determining the weight of paper or paperboard classifiable in this chapter according to weight shall be conditioned in an atmosphere at 50 percent (± 2 percent) relative humidity and at a temperature of 23°C(± 2°C).

Statistical Notes

1. The term "standard newsprint paper" covers printing papers of heading 4801 which conform to the following specifications:

Weight: Not less than 46.3 g/m² nor more than 57 g/m².

Size: Rolls not less than 33 cm wide and not less than 71 cm in diameter; sheets not less than 51 cm by 76 cm.

Thickness: Not more than 0.11 mm.

Sizing: Time of transudation of water shall be not more than 10 seconds by the ground glass method.

Ash Content: Not more than 6.5 percent.

Color and Finish: White; or tinted shades of pink, peach or green in rolls; not more than 50 percent gloss when tested with the Ingersoll glarimeter.

2. For the purposes of statistical reporting number 4823.90.8620, shoe coverings (booties) must be 50 percent or more by weight of cellulose/paper. This provision does not include disposable shoe coverings (booties) of non-woven textile fibers classified in heading 6307.

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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4801.00.01		Newsprint, in rolls or sheets.....		Free ^{1/}		Free
	20	Standard newsprint paper.....	t			
	40	Other.....	t			
4802		Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch-cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 4801 or 4803; hand-made paper and paperboard:				
4802.10.00	00	Handmade paper and paperboard.....	kg	Free ^{1/}		17.5%
4802.20		Paper and paperboard of a kind used as a base for photo-sensitive, heat-sensitive or electro-sensitive paper or paperboard:				
4802.20.10	00	In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....	m ²	Free ^{1/}		20%
		Other:				
4802.20.20	00	Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5% ^{2/}
			m ²			
4802.20.40		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			
4802.40.00	00	Wallpaper base (hanging paper).....	kg	Free ^{1/}		10%
		Other paper and paperboard, not containing fibers obtained by a mechanical or chemi-mechanical process or of which not more than 10 percent by weight of the total fiber content consists of such fibers:				
4802.54		Weighing less than 40 g/m ² :				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4802.54.10	00	Writing paper.....	kg	Free ^{1/}		28%
4802.54.20	00	India and bible paper.....	kg	Free ^{1/}		18%
4802.54.31	00	Other.....	kg	Free ^{1/}		11.5%
		Other:				
4802.54.50	00	Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4802.54.61	00	Other.....	kg	Free ^{1/}		30%

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X
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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		2
				1		
				General	Special	
4802 (con.)		Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch-cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 4801 or 4803; hand-made paper and paperboard: (con.)				
		Other paper and paperboard, not containing fibers obtained by a mechanical or chemi-mechanical process or of which not more than 10 percent by weight of the total fiber content consists of such fibers: (con.)				
4802.55		Weighing 40 g/m ² or more but not more than 150 g/m ² , in rolls:				
		Of a width exceeding 15 cm:				
4802.55.10	00	Writing and cover paper.....	kg	Free ^{1/}		28%
4802.55.20	00	Drawing paper.....	kg	Free ^{1/}		15.5%
4802.55.30	00	India and bible paper.....	kg	Free ^{1/}		18%
4802.55.40	00	Other.....	kg	Free ^{1/}		11.5%
		Other:				
4802.55.60	00	Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4802.55.70		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			
4802.56		Weighing 40 g/m ² or more but not more than 150 g/m ² , in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state:				
		With one side exceeding 360 mm and the other side exceeding 150 mm in the unfolded state:				
4802.56.10	00	Writing and cover paper.....	kg	Free ^{1/}		28%
4802.56.20	00	Drawing paper.....	kg	Free ^{1/}		15.5%
4802.56.30	00	India and bible paper.....	kg	Free ^{1/}		18%
4802.56.40	00	Other.....	kg	Free ^{1/}		11.5%
		Other:				
4802.56.60	00	Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4802.56.70		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
		Other:				
	50	Writing and cover paper.....	kg			
	90	Other.....	kg			

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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4802 (con.)		Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch-cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 4801 or 4803; hand-made paper and paperboard: (con.)				
		Other paper and paperboard, not containing fibers obtained by a mechanical or chemi-mechanical process or of which not more than 10 percent by weight of the total fiber content consists of such fibers: (con.)				
4802.57		Other, weighing 40 g/m ² or more but not more than 150 g/m ² :				
4802.57.10		Writing and cover paper.....		Free ^{1/}		28%
	40	With one side equal to 965 mm and the other side equal to 635 mm in the unfolded state....	kg			
	85	Other.....	kg			
4802.57.20	00	Drawing paper.....	kg	Free ^{1/}		15.5%
4802.57.30	00	India and bible paper.....	kg	Free ^{1/}		18%
4802.57.40		Other.....		Free ^{1/}		11.5%
	40	With one side equal to 965 mm and the other side equal to 635 mm in the unfolded state....	kg			
	85	Other.....	kg			
4802.58		Weighing more than 150 g/m ² :				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4802.58.10	00	Writing and cover paper.....	kg	Free ^{1/}		30%
4802.58.20		Other.....		Free ^{1/}		24.5%
	20	Drawing paper.....	kg			
	40	Bristols.....	kg			
	80	Other.....	kg			
4802.58.50	00	Other: Basic paper to be sensitized for use in photography.....	kg m ²	Free ^{1/}		5%
4802.58.60		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			

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Annotated for Statistical Reporting Purposes

X
48-8

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		2
				1	Special	
4802 (con.)		Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch-cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 4801 or 4803; hand-made paper and paperboard: (con.)				
		Other paper and paperboard, of which more than 10 percent by weight of the total fiber content consists of fibers obtained by a mechanical or chemi-mechanical process:				
4802.61		In rolls:				
		Of a width exceeding 15 cm:				
4802.61.10	00	Writing and cover paper.....	kg	Free ^{1/}		28%
4802.61.20	00	Drawing paper.....	kg	Free ^{1/}		15.5%
4802.61.31		Other.....		Free ^{1/}		11.5%
	10	Weighing less than 40 g/m ²	kg			
		Other:				
	35	Supercalendered.....	kg			
	91	Other.....	kg			
4802.61.50	00	Other: Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4802.61.60		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			
4802.62		In sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state:				
		With one side exceeding 360 mm and the other side exceeding 150 mm in the unfolded state:				
4802.62.10	00	Writing and cover paper.....	kg	Free ^{1/}		28%
4802.62.20	00	Drawing paper.....	kg	Free ^{1/}		15.5%
4802.62.30	00	Other.....	kg	Free ^{1/}		11.5%
4802.62.50	00	Other: Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4802.62.61		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			
4802.69		Other:				
4802.69.10	00	Writing and cover paper.....	kg	Free ^{1/}		28%
4802.69.20	00	Drawing paper.....	kg	Free ^{1/}		15.5%
4802.69.30	00	Other.....	kg	Free ^{1/}		11.5%

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48-9

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4803.00		Toilet or facial tissue stock, towel or napkin stock and similar paper of a kind used for household or sanitary purposes, cellulose wadding and webs of cellulose fibers, whether or not creped, crinkled, embossed, perforated, surface-colored, surface decorated or printed, in rolls or sheets:				
4803.00.20	00	Cellulose wadding.....	kg	Free ^{1/}		24%
4803.00.40	00	Other.....	kg	Free ^{1/}		36%
4804		Uncoated kraft paper and paperboard, in rolls or sheets, other than that of heading 4802 or 4803:				
		Kraftliner:				
4804.11.00	00	Unbleached.....	kg	Free ^{1/}		20%
4804.19.00	00	Other.....	kg	Free ^{1/}		20% ^{2/}
		Sack kraft paper:				
4804.21.00	00	Unbleached.....	kg	Free ^{1/}		30% ^{2/}
4804.29.00	00	Other.....	kg	Free ^{1/}		30%
		Other kraft paper and paperboard weighing 150 g/m ² or less:				
4804.31		Unbleached:				
		Condenser paper:				
4804.31.10	00	Weighing over 15 g/m ² but not over 30 g/m ² ...	kg	Free ^{1/}		20.5%
4804.31.20	00	Other.....	kg	Free ^{1/}		25%
4804.31.40		Wrapping paper.....		Free ^{1/}		30%
	20	Bag or sack paper.....	kg			
	40	Other.....	kg			
4804.31.60	00	Other.....	kg	Free ^{1/}		30%
4804.39		Other:				
4804.39.20	00	Condenser paper.....	kg	Free ^{1/}		25%
4804.39.40		Wrapping paper.....		Free ^{1/}		30%
	20	Bag or sack paper.....	kg			
	41	Other:				
		Tissue paper having a basis weight not exceeding 29 g/m ² , in sheets.....	kg			
	49	Other.....	kg			
4804.39.60		Other.....		Free ^{1/}		30%
	20	Base stock for trays, dishes, plates, cups and the like.....	kg			
	40	Other.....	kg			

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48-10

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4804 (con.)		Uncoated kraft paper and paperboard, in rolls or sheets, other than that of heading 4802 or 4803: (con.)				
		Other kraft paper and paperboard weighing more than 150 g/m ² but less than 225 g/m ² :				
4804.41		Unbleached:				
4804.41.20	00	Wrapping paper.....	kg	Free ^{1/}		30%
4804.41.40	00	Other.....	kg	Free ^{1/}		30%
4804.42.00		Bleached uniformly throughout the mass and of which more than 95 percent by weight of the total fiber content consists of wood fibers obtained by a chemical process.....		Free ^{1/}		30%
	10	Base stock for milk cartons and other beverage containers.....	kg			
		Other:				
	20	Folding carton stock.....	kg			
	30	Base stock for trays, dishes, plates, cups and the like.....	kg			
		Other:				
	40	Base stock for packaging.....	kg			
	50	Other.....	kg			
4804.49.00	00	Other.....	kg	Free ^{1/}		30%
		Other kraft paper and paperboard weighing 225 g/m ² or more:				
4804.51.00	00	Unbleached.....	kg	Free ^{1/}		30%
4804.52.00		Bleached uniformly throughout the mass and of which more than 95 percent by weight of the total fiber content consists of wood fibers obtained by a chemical process.....		Free ^{1/}		30%
	10	Base stock for milk cartons and other beverage containers.....	kg			
		Other:				
	20	Folding carton stock.....	kg			
	30	Base stock for trays, dishes, plates, cups and the like.....	kg			
		Other:				
	40	Base stock for packaging.....	kg			
	50	Other.....	kg			
4804.59.00	00	Other.....	kg	Free ^{1/}		30%

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48-11

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4805		Other uncoated paper and paperboard, in rolls or sheets, not further worked or processed than as specified in note 3 to this chapter:				
		Fluting paper:				
4805.11.00	00	Semichemical fluting paper.....	kg	Free ^{1/}		30% ^{2/}
4805.12		Straw fluting paper:				
4805.12.10	00	Weighing 150 g/m ² or less.....	kg	Free ^{1/}		30%
4805.12.20	00	Weighing over 150 g/m ²	kg	Free ^{1/}		30%
4805.19		Other:				
4805.19.10	00	Weighing 150 g/m ² or less.....	kg	Free ^{1/}		30% ^{2/}
4805.19.20	00	Weighing over 150 g/m ²	kg	Free ^{1/}		30% ^{2/}
		Testliner (recycled liner board):				
4805.24		Weighing 150 g/m ² or less:				
4805.24.50	00	Weighing not over 15 g/m ²	kg	Free ^{1/}		30%
4805.24.70	00	Weighing over 15 g/m ² but not over 30 g/m ²	kg	Free ^{1/}		11¢/kg + 15%
4805.24.90	00	Weighing over 30 g/m ²	kg	Free ^{1/}		30%
4805.25.00	00	Weighing more than 150 g/m ²	kg	Free ^{1/}		30% ^{2/}
4805.30.00	00	Sulfite wrapping paper.....	kg	Free ^{1/}		30%
4805.40.00	00	Filter paper and paperboard.....	kg	Free ^{1/}		11¢/kg + 15%
4805.50.00	00	Felt paper and paperboard.....	kg	Free ^{1/}		10%

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48-12

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		2
				1	Special	
4805 (con.)		Other uncoated paper and paperboard, in rolls or sheets, not further worked or processed than as specified in note 3 to this chapter: (con.)				
		Other:				
4805.91		Weighing 150 g/m ² or less:				
4805.91.10		Multi-ply paper and paperboard; bibulous and wrapping paper.....		Free ^{1/}		30%
	10	Folding carton board.....	kg			
	90	Other.....	kg			
4805.91.20	00	Condenser paper.....	kg	Free ^{1/}		25%
		Other:				
4805.91.50	00	Weighing not over 15 g/m ²	kg	Free ^{1/}		30%
4805.91.70	00	Weighing over 15 g/m ² but not over 30 g/m ² ...	kg	Free ^{1/}		11¢/kg + 15%
4805.91.90	00	Weighing over 30 g/m ²	kg	Free ^{1/}		30%
4805.92		Weighing more than 150 g/m ² but less than 225 g/m ² :				
4805.92.20	00	Pressboard.....	kg	Free ^{1/}		30%
4805.92.40		Other.....		Free ^{1/}		30% ^{2/}
	10	Folding carton board.....	kg			
	20	Construction paper.....	kg			
	30	Linerboard containing by weight less than 80 percent chemical sulfate wood pulp.....	kg			
	40	Other.....	kg			
4805.93		Weighing 225 g/m ² or more:				
4805.93.20	00	Pressboard.....	kg	Free ^{1/}		30%
4805.93.40		Other.....		Free ^{1/}		30%
	10	Folding carton board.....	kg			
	15	Wet machine board.....	kg			
	20	Construction paper.....	kg			
	30	Linerboard containing by weight less than 80 percent chemical sulfate wood pulp.....	kg			
	50	Tube and core board.....	kg			
	60	Other.....	kg			
4806		Vegetable parchment, greaseproof papers, tracing papers and glassine and other glazed transparent or translucent papers, in rolls or sheets:				
4806.10.00	00	Vegetable parchment.....	kg	Free ^{1/}		19% ^{2/}
4806.20.00	00	Greaseproof papers.....	kg	Free ^{1/}		7¢/kg + 15%
4806.30.00	00	Tracing papers.....	kg	Free ^{1/}		7¢/kg + 15%
4806.40.00	00	Glassine and other glazed transparent or translucent papers.....	kg	Free ^{1/}		7¢/kg + 15%

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48-13

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4807.00		Composite paper and paperboard (made by sticking flat layers of paper or paperboard together with an adhesive), not surface-coated or impregnated, whether or not internally reinforced, in rolls or sheets:				
4807.00.10	00	Paper and paperboard, laminated internally with bitumen, tar or asphalt.....	kg	Free ^{1/}		30%
		Other:				
4807.00.91	00	Straw paper and paperboard, whether or not covered with paper other than straw paper.....	kg	Free ^{1/}		30%
		Other:				
4807.00.92	00	Cloth-lined or reinforced paper.....	kg	Free ^{1/}		22.5%
4807.00.94	00	Other.....	kg	Free ^{1/}		30%
4808		Paper and paperboard, corrugated (with or without glued flat surface sheets), creped, crinkled, embossed or perforated, in rolls or sheets, other than paper of the kind described in heading 4803:				
4808.10.00	00	Corrugated paper and paperboard, whether or not perforated.....	kg	Free ^{1/}		30%
4808.40.00	00	Kraft paper, creped or crinkled, whether or not embossed or perforated.....	kg	Free ^{1/}		36%
		Other:				
4808.90						
4808.90.20	00	Creped or crinkled.....	kg	Free ^{1/}		36%
4808.90.40	00	Embossed.....	kg	Free ^{1/}		18.5%
4808.90.60	00	Other.....	kg	Free ^{1/}		35%
4809		Carbon paper, self-copy paper and other copying or transfer papers (including coated or impregnated paper for duplicator stencils or offset plates), whether or not printed, in rolls or sheets:				
		Self-copy paper:				
4809.20						
4809.20.20	00	Writing paper.....	kg	Free ^{1/}		35%
4809.20.40	00	Other.....	kg	Free ^{1/}		25%
		Other:				
4809.90						
4809.90.20	00	Stereotype-matrix board and mat.....	kg	Free ^{1/}		35%
		Decalcomania paper:				
4809.90.40	00	Simplex.....	kg	Free ^{1/}		15%
4809.90.60	00	Duplex.....	kg	Free ^{1/}		Free
		Other:				
4809.90.71	00	Impregnated, coated or both, but not otherwise treated.....	kg	Free ^{1/}		25%
4809.90.80	00	Other.....	kg	Free ^{1/}		20%

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48-14

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4810		Paper and paperboard, coated on one or both sides with kaolin (China clay) or other inorganic substances, with or without a binder, and with no other coating, whether or not surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size:				
		Paper and paperboard of a kind used for writing, printing or other graphic purposes, not containing fibers obtained by a mechanical or chemi-mechanical process or of which not more than 10 percent by weight of the total fiber content consists of such fibers:				
4810.13		In rolls:				
		Of a width exceeding 15 cm:				
		Weighing not more than 150 g/m ² :				
4810.13.11		Basic paper to be sensitized for use in photography.....		Free ^{1/}		5%
	20	Baryta coated.....	kg m ²			
	40	Other.....	kg m ²			
4810.13.13	00	India or bible paper.....	kg	Free ^{1/}		24%
4810.13.19	00	Other.....	kg	Free ^{1/}		37%
4810.13.20		Weighing more than 150 g/m ²		Free ^{1/}		42%
	10	Coated on one side only.....	kg			
	90	Other.....	kg			
		Other:				
4810.13.50	00	Printed, embossed or perforated.....	kg	Free ^{1/}		30%
		Other:				
4810.13.60	00	Basic paper to be sensitized for use in photography.....	kg m ²	Free ^{1/}		5%
4810.13.70		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			

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48-15

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4810 (con.)		Paper and paperboard, coated on one or both sides with kaolin (China clay) or other inorganic substances, with or without a binder, and with no other coating, whether or not surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size: (con.)				
		Paper and paperboard of a kind used for writing, printing or other graphic purposes, not containing fibers obtained by a mechanical or chemi-mechanical process or of which not more than 10 percent by weight of the total fiber content consists of such fibers: (con.)				
4810.14		In sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state:				
		With one side exceeding 360 mm and the other side exceeding 150 mm in the unfolded state:				
		Weighing not more than 150 g/m ² :				
4810.14.11		Basic paper to be sensitized for use in photography.....		Free ^{1/}		5%
	20	Baryta coated.....	kg m ²			
	40	Other.....	kg m ²			
4810.14.13	00	India or bible paper.....	kg	Free ^{1/}		24%
4810.14.19	00	Other.....	kg	Free ^{1/}		37%
4810.14.20		Weighing more than 150 g/m ²		Free ^{1/}		42%
	10	Coated on one side only.....	kg			
	90	Other.....	kg			
		Other:				
4810.14.50	00	Printed, embossed or perforated.....	kg	Free ^{1/}		30%
		Other:				
4810.14.60	00	Basic paper to be sensitized for use in photography.....	kg m ²	Free ^{1/}		5%
4810.14.70		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			
4810.19		Other:				
		Weighing not more than 150 g/m ² :				
4810.19.11	00	Basic paper to be sensitized for use in photography.....	kg m ²	Free ^{1/}		5%
4810.19.13	00	India or bible paper.....	kg	Free ^{1/}		24%
4810.19.19	00	Other.....	kg	Free ^{1/}		37%
4810.19.20		Weighing more than 150 g/m ²		Free ^{1/}		42%
	10	Coated on one side only.....	kg			
	90	Other.....	kg			

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48-16

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		2
				1	Special	
4810 (con.)		Paper and paperboard, coated on one or both sides with kaolin (China clay) or other inorganic substances, with or without a binder, and with no other coating, whether or not surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size: (con.)				
		Paper and paperboard of a kind used for writing, printing or other graphic purposes, of which more than 10 percent by weight of the total fiber content consists of fibers obtained by a mechanical or chemi-mechanical process:				
4810.22		Light-weight coated paper:				
4810.22.10	00	In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....	kg	Free ^{1/}		37%
		Other:				
4810.22.50		Printed, embossed or perforated.....		Free ^{1/}		30%
	44	Hole-punched looseleaf paper.....	kg			
	80	Other.....	kg			
		Other:				
4810.22.60	00	Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4810.22.70		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
	40	Other.....	kg			
4810.29		Other:				
4810.29.10		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....		Free ^{1/}		37%
	25	In rolls.....	kg			
	35	In sheets.....	kg			
		Other:				
4810.29.50	00	Printed, embossed or perforated.....	kg	Free ^{1/}		30%
		Other:				
4810.29.60	00	Basic paper to be sensitized for use in photography.....	kg	Free ^{1/}		5%
			m ²			
4810.29.70		Other.....		Free ^{1/}		30%
	20	Containing by weight 25 percent or more cotton fiber.....	kg			
		Other:				
	25	In rolls.....	kg			
	35	In sheets.....	kg			

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48-17

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4810 (con.)		Paper and paperboard, coated on one or both sides with kaolin (China clay) or other inorganic substances, with or without a binder, and with no other coating, whether or not surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size: (con.)				
		Kraft paper and paperboard, other than that of a kind used for writing, printing or other graphic purposes:				
4810.31		Bleached uniformly throughout the mass and of which more than 95 percent by weight of the total fiber content consists of wood fibers obtained by a chemical process and weighing 150 g/m ² or less:				
4810.31.10		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....		Free ^{1/}		25%
	20	Folding carton stock.....	kg			
	40	Base stock for trays, dishes, plates, cups and the like.....	kg			
		Other:				
	50	Gift wrap.....	kg			
	80	Other.....	kg			
4810.31.30	00	Other: Cards, not punched, for punchcard machines, whether or not in strips.....	kg	Free ^{1/}		30%
4810.31.65	00	Other.....	kg	Free ^{1/}		26.5%
4810.32		Bleached uniformly throughout the mass and of which more than 95 percent by weight of the total fiber content consists of wood fibers obtained by a chemical process and weighing more than 150 g/m ² :				
4810.32.10		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....		Free ^{1/}		25%
	20	Folding carton stock.....	kg			
	40	Base stock for trays, dishes, plates, cups and the like.....	kg			
	60	Other.....	kg			
		Other:				
4810.32.30	00	Cards, not punched, for punchcard machines, whether or not in strips.....	kg	Free ^{1/}		30%
4810.32.65	00	Other.....	kg	Free ^{1/}		26.5%
4810.39		Other:				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4810.39.12	00	Whether or not impregnated, but not otherwise treated.....	kg	Free ^{1/}		25%
4810.39.14	00	Other.....	kg	Free ^{1/}		20%
		Other:				
4810.39.30	00	Cards, not punched, for punchcard machines, whether or not in strips.....	kg	Free ^{1/}		30%
4810.39.65	00	Other.....	kg	Free ^{1/}		26.5%

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48-18

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4810 (con.)		Paper and paperboard, coated on one or both sides with kaolin (China clay) or other inorganic substances, with or without a binder, and with no other coating, whether or not surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size: (con.)				
		Other paper and paperboard:				
4810.92		Multi-ply:				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4810.92.12		Weighing more than 150 g/m ²		Free ^{1/}		30%
	25	In rolls.....	kg			
	35	In sheets.....	kg			
4810.92.14		Other.....		Free ^{1/}		20%
	25	In rolls.....	kg			
	35	In sheets.....	kg			
		Other:				
4810.92.30	00	Cards, not punched, for punch card machines, whether or not in strips.....	kg	Free ^{1/}		30%
4810.92.65		Other.....		Free ^{1/}		26.5%
	25	In rolls.....	kg			
	35	In sheets.....	kg			
4810.99		Other:				
4810.99.10		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....		Free ^{1/}		20%
	10	Gift wrap paper.....	kg			
	50	Folding Carton.....	kg			
	60	Other.....	kg			
		Other:				
4810.99.30	00	Cards, not punched, for punch card machines, whether or not in strips.....	kg	Free ^{1/}		30%
4810.99.65	00	Other.....	kg	Free ^{1/}		26.5%

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48-19

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4811		Paper, paperboard, cellulose wadding and webs of cellulose fibers, coated, impregnated, covered, surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size, other than goods of the kind described in heading 4803, 4809 or 4810:				
4811.10		Tarred, bituminized or asphalted paper and paperboard:				
4811.10.11	00	In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....	kg	Free ^{1/}		10%
4811.10.21	00	Other.....	kg	Free ^{1/}		26.5%
4811.41		Gummed or adhesive paper and paperboard:				
4811.41.10	00	Self-adhesive:				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....	kg	Free ^{1/}		40%
4811.41.21	00	Other:				
		In strips or rolls.....	kg	Free ^{1/}		40%
4811.41.30	00	Other.....	kg	Free ^{1/}		35%
4811.49		Other:				
4811.49.10	00	In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....	kg	Free ^{1/}		14%
4811.49.21	00	Other:				
		In strips or rolls.....	kg	Free ^{1/}		30%
4811.49.30	00	Other.....	kg	Free ^{1/}		35%

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48-20

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		2
				1	Special	
4811 (con.)		Paper, paperboard, cellulose wadding and webs of cellulose fibers, coated, impregnated, covered, surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size, other than goods of the kind described in heading 4803, 4809 or 4810: (con.)				
4811.51		Paper and paperboard, coated, impregnated or covered with plastics (excluding adhesives):				
		Bleached, weighing more than 150 g/m ² :				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4811.51.20		0.3 mm or more in thickness.....		Free ^{1/}		30%
	10	Base stock for milk cartons and other beverage containers.....	kg			
		Other:				
	20	Folding carton stock.....	kg			
	30	Base stock for trays, dishes, plates, cups and the like.....	kg			
		Other:				
	40	Base stock for packaging.....	kg			
	50	Other.....	kg			
4811.51.40	00	Other.....	kg	Free ^{1/}		42%
4811.51.60	00	Other.....	kg	Free ^{1/}		35%
4811.59		Other:				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4811.59.20	00	Printing paper.....	kg	Free ^{1/}		37%
4811.59.40		Other.....		Free ^{1/}		25% ^{2/}
	20	Folding carton stock.....	kg			
	40	Other.....	kg			
4811.59.60	00	Other.....	kg	Free ^{1/}		35%
4811.60		Paper and paperboard, coated, impregnated or covered with wax, paraffin, stearin, oil or glycerol:				
4811.60.40	00	In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state.....	kg	Free ^{1/}		17.5%
4811.60.60	00	Other.....	kg	Free ^{1/}		35%

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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4811 (con.)		Paper, paperboard, cellulose wadding and webs of cellulose fibers, coated, impregnated, covered, surface-colored, surface-decorated or printed, in rolls or rectangular (including square) sheets, of any size, other than goods of the kind described in heading 4803, 4809 or 4810: (con.)				
4811.90		Other paper, paperboard, cellulose wadding and webs of cellulose fibers:				
		In strips or rolls of a width exceeding 15 cm or in rectangular (including square) sheets with one side exceeding 36 cm and the other side exceeding 15 cm in the unfolded state:				
4811.90.10	00	Handmade paper.....	kg	Free ^{1/}		27%
		Other:				
4811.90.20	00	Wholly or partly covered with flock, gelatin, metal or metal solutions.....	kg	Free ^{1/}		22.5%
		Other:				
4811.90.30	00	Impregnated with latex.....	kg	Free ^{1/}		25%
		Other:				
4811.90.40		Weighing not over 15 g/m ²		Free ^{1/}		30%
	10	Tissue papers, in sheets.....	kg			
	90	Other.....	kg			
4811.90.60		Weighing over 15 g/m ² but not over 30 g/m ²		Free ^{1/}		20%
	10	Tissue papers having a basis weight not exceeding 29 g/m ² , in sheets.....	kg			
	90	Other.....	kg			
4811.90.80		Weighing over 30 g/m ²		Free ^{1/}		18.5%
	20	Gift Wrap (other than tissue).....	kg			
	30	Direct thermal coated paper.....	kg			
	50	Other.....	kg			
4811.90.90		Other.....		Free ^{1/}		35%
	10	Tissue papers having a basis weight not exceeding 29 g/m ² , in sheets.....	kg			
	30	Direct thermal coated paper.....	kg			
	35	Paper in sheets, lined or ruled, having a width of 152.4 to 360 mm inclusive and a length of 225.25 to 360 mm inclusive.....	kg			
	80	Other.....	kg			
4812.00.00	00	Filter blocks, slabs and plates, of paper pulp.....	kg	Free ^{1/}		20%
4813		Cigarette paper, whether or not cut to size or in the form of booklets or tubes:				
4813.10.00	00	In the form of booklets or tubes.....	kg	Free ^{1/3/}		60% ^{3/}
4813.20.00	00	In rolls of a width not exceeding 5 cm.....	kg	Free ^{1/}		60%
4813.90.00	00	Other.....	kg	Free ^{1/}		60%

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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4814		Wallpaper and similar wallcoverings; window transparencies of paper:				
4814.20.00	00	Wallpaper and similar wallcoverings, consisting of paper coated or covered, on the face side, with a grained, embossed, colored, design-printed or otherwise decorated layer of plastics.....	kg	Free ^{4/}		3.3¢/kg + 20%
4814.90.02	00	Other.....	kg	Free ^{4/}		3.3¢/kg + 20% ^{2/}
4816		Carbon paper, self-copy paper and other copying or transfer papers (other than those of heading 4809), duplicator stencils and offset plates, of paper, whether or not put up in boxes:				
4816.20.00	00	Self-copy paper.....	kg	Free ^{1/}		30%
4816.90.01	00	Other.....	kg	Free ^{1/}		35%
4817		Envelopes, letter cards, plain postcards and correspondence cards, of paper or paperboard; boxes, pouches, wallets and writing compendiums, of paper or paperboard, containing an assortment of paper stationery:				
4817.10.00	00	Envelopes.....	thousands..	Free ^{1/}		35%
4817.20		Letter cards, plain postcards and correspondence cards:				
4817.20.20	00	Sheets of writing paper, with border gummed or perforated, with or without inserts, prepared for use as combination sheets and envelopes.....	kg	Free ^{1/}		40%
4817.20.40	00	Other.....	kg	Free ^{1/}		33%
4817.30.00	00	Boxes, pouches, wallets and writing compendiums, of paper or paperboard, containing an assortment of paper stationery.....	kg	Free ^{1/}		40%
4818		Toilet paper and similar paper, cellulose wadding or webs of cellulose fibers, of a kind used for household or sanitary purposes, in rolls of a width not exceeding 36 cm, or cut to size or shape; handkerchiefs, cleansing tissues, towels, tablecloths, table napkins, bed sheets and similar household, sanitary or hospital articles, articles of apparel and clothing accessories, of paper pulp, paper, cellulose wadding or webs of cellulose fibers:				
4818.10.00	00	Toilet paper.....	kg	Free ^{1/}		35%
4818.20.00		Handkerchiefs, cleansing or facial tissues and towels.....		Free ^{1/}		35%
	20	Towels.....	kg			
	40	Other.....	kg			
4818.30.00	00	Tablecloths and table napkins.....	kg	Free ^{1/}		35%
4818.50.00		Articles of apparel and clothing accessories.....		Free ^{1/}		26.5%
	20	Hospital/medical gowns or scrubs.....	kg			
	80	Other.....	kg			
4818.90.00		Other.....		Free ^{4/}		30%
	20	Face masks.....	kg			
	80	Other.....	kg			

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48-23

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4819		Cartons, boxes, cases, bags and other packing containers, of paper, paperboard, cellulose wadding or webs of cellulose fibers; box files, letter trays and similar articles, of paper or paperboard of a kind used in offices, shops or the like:				
4819.10.00		Cartons, boxes and cases, of corrugated paper or paperboard.....		Free ^{1/}		35%
	20	Sanitary food and beverage containers.....	kg			
	40	Other.....	kg			
4819.20.00		Folding cartons, boxes and cases, of non-corrugated paper or paperboard.....		Free ^{1/}		35%
	20	Sanitary food and beverage containers.....	kg			
	40	Other.....	kg			
4819.30.00		Sacks and bags, having a base of a width of 40 cm or more.....		Free ^{1/}		35%
	20	Shipping sacks and multiwall bags, other than grocers' bags.....	kg			
	40	Other.....	kg			
4819.40.00		Other sacks and bags, including cones.....		Free ^{1/}		35%
	20	Shipping sacks and multiwall bags, other than grocers' bags.....	kg			
	40	Other.....	kg			
4819.50		Other packing containers, including record sleeves:				
4819.50.20	00	Sanitary food and beverage containers.....	kg	Free ^{1/}		35%
4819.50.30	00	Record sleeves.....	kg	Free ^{1/}		19.3¢/kg
4819.50.40		Other.....		Free ^{1/}		35%
	20	Fiber drums, cans, tubes and similar containers...	kg			
		Other:				
	40	Rigid boxes and cartons.....	kg			
	60	Other.....	kg			
4819.60.00	00	Box files, letter trays, storage boxes and similar articles, of a kind used in offices, shops or the like.....	kg	Free ^{1/}		35%

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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		2
				1	Special	
4820		Registers, account books, notebooks, order books, receipt books, letter pads, memorandum pads, diaries and similar articles, exercise books, blotting pads, binders (looseleaf or other), folders, file covers, manifold business forms, interleaved carbon sets and other articles of stationery, of paper or paperboard; albums for samples or for collections and book covers (including cover boards and book jackets) of paper or paperboard:				
4820.10		Registers, account books, notebooks, order books, receipt books, letter pads, memorandum pads, diaries and similar articles:				
4820.10.20		Diaries, notebooks and address books, bound; memorandum pads, letter pads and similar articles.....		Free ^{1/}		25% ^{2/}
	10	Diaries and address books.....	No.			
	20	Memorandum pads, letter pads and similar articles.....	No.			
	30	Sewn composition books with dimensions of 152.4-381 mm (6" - 15"), inclusive (small side) X 222.5-381 mm (8.75" -15"), inclusive (large side).....	No.			
	40	Other note books with dimensions of 152.4-381 mm (6" - 15"), inclusive (small side) X 222.5-381 mm (8.75" -15"), inclusive (large side).....	No.			
	60	Other.....	No.			
4820.10.40	00	Other.....	No.....	Free ^{1/}		25%
4820.20.00	00	Exercise books.....	No.....	Free ^{1/}		25%
4820.30.00		Binders (other than book covers), folders and file covers..		Free ^{1/}		35%
	20	Looseleaf binders.....	kg			
	40	Other.....	kg			
4820.40.00	00	Manifold business forms and interleaved carbon sets.....	kg.....	Free ^{1/}		26.5%
4820.50.00	00	Albums for samples or for collections.....	No.....	Free ^{1/}		30%
4820.90.00	00	Other.....	kg.....	Free ^{1/}		35%
4821		Paper and paperboard labels of all kinds, whether or not printed:				
4821.10		Printed:				
4821.10.20	00	Printed in whole or in part by a lithographic process....	kg.....	Free ^{1/}		88c/kg ^{2/}
4821.10.40	00	Other.....	kg.....	Free ^{1/}		35%
4821.90		Other:				
4821.90.20	00	Self-adhesive.....	kg.....	Free ^{1/}		40%
4821.90.40	00	Other.....	kg.....	Free ^{1/}		30%
4822		Bobbins, spools, cops and similar supports of paper pulp, paper or paperboard (whether or not perforated or hardened):				
4822.10.00	00	Of a kind used for winding textile yarn.....	kg.....	Free ^{1/}		43%
4822.90.00	00	Other.....	kg.....	Free ^{1/}		35%

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Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4823		Other paper, paperboard, cellulose wadding and webs of cellulose fibers, cut to size or shape; other articles of paper pulp, paper, paperboard, cellulose wadding or webs of cellulose fibers:				
4823.20		Filter paper and paperboard:				
4823.20.10	00	Paint filters and strainers.....	kg	Free ^{1/}		35%
4823.20.90	00	Other.....	kg	Free ^{1/}		30%
4823.40.00	00	Rolls, sheets and dials, printed for self-recording apparatus.....	kg	Free ^{1/}		35%
		Trays, dishes, plates, cups and the like, of paper or paperboard:				
4823.61.00		Of bamboo.....		Free ^{1/}		35%
	20	Cups and round nested food containers.....	kg			
	40	Other.....	kg			
4823.69.00		Other.....		Free ^{1/}		35%
	20	Cups and round nested food containers.....	kg			
	40	Other.....	kg			
4823.70.00		Molded or pressed articles of paper pulp.....		Free ^{1/}		30% ^{2/}
	20	Plates, bowls or cups.....	No.			
	40	Other.....	kg			
4823.90		Other:				
4823.90.10	00	Of paper pulp.....	kg	Free ^{1/}		30%
4823.90.20	00	Of papier-mâché.....	kg	Free ^{1/}		25%
		Other:				
4823.90.31	00	Cards, not punched, for punchcard machines, whether or not in strips.....	kg	Free ^{1/}		30%
4823.90.40	00	Frames or mounts for photographic slides.....	kg	Free ^{1/}		45%
4823.90.50	00	Hand fans.....	kg	Free ^{1/}		50%
		No.				
		Other:				
		Of coated paper or paperboard:				
4823.90.60	00	Gaskets, washers and other seals.....	kg	Free ^{1/}		26.5%
4823.90.67	00	Other.....	kg	Free ^{1/}		26.5%
4823.90.70	00	Of cellulose wadding.....	kg	Free ^{1/}		19.5%
		Other:				
4823.90.80	00	Gaskets, washers and other seals.....	kg	Free ^{1/}		35%
4823.90.86		Other.....		Free ^{1/}		35%
	20	Shoe covers (booties) of a kind described in statistical note 2 to this chapter.....	kg			
	80	Other.....	kg			

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Endnotes--page 48 - 26

1/ See 9903.88.03.

2/ See 9903.90.08.

3/ Imports under this provision may be subject to Federal Excise Tax (26 U.S.C. 5701).

4/ See 9903.88.15.

EXHIBIT I-15

Chinese Producers/Exporters				
Company Name	Address	E-Mail	Phone Number	Website
AB S INDUSTRIES HK LIMITED	Unit 901, Landwide Commercial Building, 118-120 Austin Rd., Tsim Sha Tsui, Kowloon, Hong Kong	n/a	n/a	n/a
ACTIVE METAL PRODUCTS CORPORATION LTD	Unit A, 16/F, Wing Sing Commercial Centre, 12-16 Wing Lok St., Sheung Wan, Hong Kong	n/a	n/a	n/a
ALLWELL TECHNOLOGY CO., LTD.	No. 2, Hsin Huan Rd., Hsin Wei, Langbei, Dongguan, Guangdong, China	n/a	n/a	n/a
BAODING HONGTAI PACKAGING CO. LTD	Fanchuang Village, Jiaozhuang Township, Baoding, Hebei, China	nina@hontapacking.com	+8615003121713	https://www.hontapacking.com/
CENTURY DISTRIBUTION SYSTEMS	8/F, North Bund Business Center, No. 1050 Dongdaming Rd., Hongkou District, Shanghai 200082, China	n/a	+8621 2501 8000	https://centurysc.com/
DONG YANG SHUMON TRADING CO., LTD	Room 815, Intime City, Baiyun St., Dongyang, Zhejiang, China	n/a	n/a	n/a
DONGGUAN HB TRADING COMPANY LTD	2nd Floor, Jada Building, Zhongli Rd., Nancheng District, Dongguan, Guangdong, China	n/a	n/a	n/a
DONGGUAN LIHE ENVIRONMENTAL PACKAGING TECHNOLOGY CO., LTD.	No. 1777, Yingbin West Rd., Bache Town, Kunshan, Suzhou, Jiangsu, China	sales001@js-liford.com	+8615962386286	https://www.lihua-printing.com/en/gsb
DONGGUAN LOPIE PAPER CO., LTD	15/F, Building A, Xinghe Dongyuehui, No. 37 Huangge Section, Panzhong Rd., Nansha District, Guangzhou, Guangdong 511455, China	CN@lopiepaper.com	+8620 8742 5822	https://www.lopiepaper.com/en/
DONGGUAN NAIYA PACKAGING PRODUCTS CO. LTD	No. 8, Nanxing Rd., 2nd Industrial Area, Shiqiu, Tangxia Town, Dongguan, Guangdong, China	n/a	+8613826513845	http://www.nypackage.com/; https://www.made-in-china.com/showroom/15814619428/
DONGGUAN QIFENG PACKING MATERIAL CO., LTD.	2/F, No. 390, Xiangyang Rd., Shiqiu, Tangxia Town, Dongguan, Guangdong, China	n/a	n/a	https://qifengblisten.alibaba.com/
DONGGUAN WELM ECO PACKAGING TECH CO	Building 1, No. 3, Xincatongbu Rd., Dongguan, Guangdong 523710, China	info@welmpacking.com	n/a	https://www.welmpacking.com/
DONGGUAN YUNXIANG WOODEN HANDICRAFT	No. 176, Xintang New Rd., Hengbang Industrial Zone, Dalingshan Town, Dongguan, Guangdong, China	n/a	n/a	https://dgyunxiang.en.alibaba.com/
DONGYANG SHUMON TRADING CO., LTD	Room 815, Intime City, Baiyun St., Dongyang, Zhejiang, China	n/a	n/a	n/a
ENCLOSED INDUSTRIAL LTD	Unit A01, 20/F, Chiap King Industrial Building, 114 King Fok St., San Po Kong, Kowloon, Hong Kong	n/a	n/a	https://sourcing.hkdc.com/en/Supplier-Store-Directory/Enclosed-Industrial-Limited/1X0A7H4V5
EVERPANDO PACKAGING (HANGZHOU) CO., LTD.	No. 27 Xianxing Rd., Xianlin, Yuhang, Hangzhou, Zhejiang 311122, China	e-sales3@everpando.com; e-sales7@everpando.com	n/a	https://paperpack.en.alibaba.com/
FOOK KEY INDUSTRIAL COMPANY LIMITED	9/F, Block 1, Wah Fung Industrial Centre, 33-39 Kwai Fung Crescent, Kwai Chung, New Territories, Hong Kong	n/a	n/a	https://sourcing.hkdc.com/en/Supplier-Store-Directory/Fook-Key-Industrial-Company-Limited/1X0GNDDK
FOSHAN FUHUTONG FURNITURE COMPANY LTD	No. 1, 2nd Xingye Rd., Guanglong Industrial Park, Chencun, Foshan, Guangdong, China	n/a	n/a	https://www.made-in-china.com/showroom/71c210e997bc030/
FUJIAN TREBOR TRADING CO., LTD.	16/F, ZhongFu Plaza, 52 East St., Fuzhou, Fujian, China	n/a	n/a	n/a
GONGYI ALLWIN ALUMINUM FOIL CO., LTD.	Room 2111, Building 6, Jincheng Times Square, No. 133 Yaoshan Rd., Jinshui District, Zhengzhou, Henan, China	info@alufoilcontainer.com	+8613103842030	https://www.allwinaluminumfoil.com/
GUANGDONG HAIJI TRADING COMPANY CO., LTD.	Room 1605, Jiahua Cailong Building, No. 9 Cailong Rd., West District, Zhongshan, Guangdong, China	n/a	n/a	https://sinouligel.en.alibaba.com/
GUANGDONG QULIGEI NEW MATERIALS TECHNOLOGY CO., LTD	Building 8, Huanyu Huilin Center, No. 428 Nancheng Section, Dongguan Ave., Nancheng Street, Dongguan, Guangdong, China	n/a	n/a	https://quligei.en.alibaba.com/
GUANGZHOU AIBO INTL IMPT & EXPT CO., LTD	Unit 1303, Yuan Plaza, 33 Jianshe 6 Rd., Yuexiu District, Guangzhou, Guangdong, China	n/a	n/a	n/a
GUANGZHOU APEX BUILDING MATERIAL CO., LTD.	Rooms 1013-1014, North Tower, Xijiao Business Center, Uxian District, Guangzhou 510163, Guangdong, China	n/a	n/a	https://apexbuilding.en.alibaba.com/
GUANGZHOU FARWON INDUSTRIAL CO., LTD.	No. 9, Mingjing Rd., Guangzhou 511400, Guangdong, China	n/a	n/a	n/a
GUANGZHOU FIVE SIX TECHNOLOGY CO., LTD.	139-12 Shicha Rd., Guangzhou, Guangdong, China	n/a	n/a	n/a
GUANGZHOU IPLAY SMART TECHNOLOGY CO.	Jaxin Building, No. 23 Huan Village East Rd., Xinshuikang, Guangzhou, Guangdong, China	mana@iplaysmart.com	+8620 8444 0213	https://www.iplaysmart.com/contact-us.html
GUANGZHOU MAIBAO PACKAGE CO., LTD.	Rooms 3201 & 3214, 180 Jiangnan Ave. Middle, Haizhu District, Guangzhou, Guangdong, China	sales@mbgpak.com	n/a	https://mbgpak.com/
GUANGZHOU TONGRU ELECTRONIC TECHNOLOGY	3/F, Building 2, No. 120, Donghuan St., Panyu District, Guangzhou, Guangdong, China	n/a	n/a	https://tongru51.en.alibaba.com/
GUANGZHOU VITALITY MANUFACTURING & EXPORT CO., LTD.	No. 3 Industrial Rd., Yumolatan St., Longgu, Taihe Town, Baiyun District, Guangzhou, Guangdong, China	n/a	n/a	https://vitalityfactory.en.made-in-china.com/
HANGZHOU LEXIU ELECTRONIC TECHNOLOGY	20/F, Building 1, No. 501, 2 Baiyang St., Qiantang, Hangzhou, Zhejiang 310000, China	n/a	n/a	https://www.globalsources.com/hangzhou-lexiu/homepage_6008894072868.htm
HEIJING PAPER PACKAGING CO., LTD	Building 2, No. 7 Linlin Rd., Lincun, Tangxia Town, Dongguan, Guangdong, China	n/a	n/a	https://dshijing.en.alibaba.com/
HESHAN PERFECTGLO HARDWARE & ELECTRIC APPLIANCES CO., LTD.	No. 75-2, Yuehe Rd., Hecheng Town, Heshan, Guangdong 529727, China	ttoto@perfect-glo.com	+86757 2888 8966	http://perfect-glo.com/
HOMMY ENTERPRISE (XINHU) COMPANY	No. 35-1 Industry Rd., Huicheng Town, Xinhu Area, Jiangmen, Guangdong, China	info@hommy.com	+86750 831 6991 ext. 808; +8613902583706	https://www.hommy.com/
HUIZHOU MOREPACK INDUSTRIAL CO., LTD.	Room 2102, 21/F, Zhilong Building, Renmin East Rd., Dayawan, Huiyang, Huizhou, Guangdong, China	n/a	+86514 8582 8120; +86514 8586 3241	http://www.morepackage.com/
HOTEL GUEST AMENITIES CO., LTD.	Building F2, Design Valley, No. 43 Taizhou Rd., Yangzhou, Jiangsu 225001, China	info@hlt.cc; connie@hlt.cc	n/a	https://www.hlt.cc/
JENNY	No. 22 Great Wall St., Hangzhou 310022, Zhejiang, China	n/a	n/a	n/a
JF POLYMERS (SUZHOU) CO., LTD.	No. 7-1, Xingzang East Rd., Busi Street, Changshu, Jiangsu, China	inquiry.na@polymaker.com; contact.ppac@polymaker.com	n/a	https://polymaker.com/
JIANGYIN WYVA TEXTILE CO LTD	No. 6 Xinyuan Rd., Jiangyin, Wuxi, Jiangsu, China	n/a	n/a	n/a
LD PACKAGING TECHNOLOGY (SHANGHAI)	No. 1 Fuda Rd., Xiqiao Sci-Tech Industrial Zone, Nanhai District, Foshan, Guangdong, China	sales@ldpack.com	+86757 8988 6348	https://www.ldpack.com/
LUOHING KUNZE IMPORT & EXPORT	No. 200 Jincheng Rd., Xinglongtai District, Panjin, Liaoning, China	eco-pack@eco-pack.com	+8618642787680	https://www.eco-pack.com/
LYNYI MIAOLIAN HOME PRODUCTS CO., LTD.	Room 1704, Building A, Haosenludu, Tongda Rd., Lianshan District, Yinyi, Shandong, China	n/a	n/a	https://china-lyny-wpc.en.made-in-china.com/
LONGGANG CITY ALLIYA ARTS CRAFTS CO	No. 588 Shidai Ave., Building 16, Nengke Industrial Park, Longgang Town, Wenzhou, Zhejiang, China	sales@wraliya.com	+8615167838166	http://www.wraliya.com/
LOPIE INTERNATIONAL (HK) LIMITED	15/F, Building A, Xinghe Dongyuehui, No. 37 Huangge Section, Panzhong Rd., Nansha District, Guangzhou, Guangdong 511455, China	CN@lopiepaper.com	+8620 8742 5822	https://www.lopiepaper.com/en/
LUOYANG XIAOYIN PAPER CO., LTD	Rongwei Wulan, Zhongzhou West Rd., Jiansi District, Luoyang, Henan, China	n/a	n/a	n/a
NANJING ORIENT ENTERPRISE LTD	Unit 3032, No. 50 Zhonghua Rd., Nanjing, Jiangsu, China	n/a	n/a	n/a
NINGBO COLIMPAC CO., LTD	No. 805 Longda Rd., Yantong Industrial Zone, Yantong Town, Yinchou District, Ningbo, Zhejiang, China	info@colimpac.com	+86574 8935 0305	https://www.colimpac.com/contact.html
NINGBO LIWAY COMMODITY CO., LTD.	No. 688 Linda Rd., Yinchou District, Ningbo, Zhejiang 315000, China	n/a	n/a	n/a
NINGBO OOLIMAPACK CO., LTD	Room 2706, North Building, Yinchou Chamber of Commerce, Yinchou District, Ningbo, Zhejiang, China	info@oolima.com	+86574 8785 4731	https://www.oolima.com/
NINGBO YARRA PAPER PRODUCTS CO., LTD	No. 1 Yongqing Rd., Jishan Industrial Zone, Xikou Town, Fenghua District, Ningbo, Zhejiang 315502, China	info@yarrapaper.co	+86574 8802 9268	https://www.yarrapaper.com/en/
QIFENG (DONGGUAN) PACKING PRODUCTS CO., LTD	No. 8 Nanxing Rd., Shiqiu, Tangxia Town, Dongguan, Guangdong, China	250285600@qq.com	+8613602346345	https://www.foodpackagingchoice.com/
FUJIAN ZHECHUANG INTERNATIONAL TRADE	No. 2 Chuangye Rd., Pingyang Town, Wenzhou, Zhejiang, China	linli@zhechuang.com	+86577 6564 5810	https://www.za-zhechuang.com/
RUNXING PRINTING LIMITED	Building 32, Hongfeng Science and Technology Industrial Park, No. 12 Jinyuan 1st Rd., Heao, Yuanshan Street, Shenzhen, Guangdong, China	sales@runxingprinting.com	+86755 8521 0530	https://www.runxingprinting.com/
SEAMASTER GLOBAL FORWARDING (SHANGHAI)	Room 02-06, 2/F, Block E, Baoning Center, 3008 Bao'an North Rd., Shenzhen, Guangdong, China	n/a	n/a	n/a
SHANDONG XINGINGHUA ENVIRONMENTAL PROTECTION	Xueshiwan Rd., Wanggou Town, Lianshan District, Linzi, Shandong, China	info@xinginghuapackaging.com	n/a	https://www.xinginghuapack.com/
SHANGHAI CONSTAN INDUSTRY CO., LTD	Room 210, No. 160 Zhuyang Rd., Langchao High-Tech Park, Qingpu District, Shanghai 201769, China	n/a	n/a	n/a

Chinese Producers/Exporters				
Company Name	Address	E-Mail	Phone Number	Website
SHENZHEN EYEE TECHNOLOGY CO., LTD.	Room 11A105, 64F, SEG Plaza, No. 1002 Huaqiang North Rd., Huaqiangbei, Shenzhen, Guangdong, China	n/a	n/a	n/a
SHENZHEN HSY LED CO., LTD.	Room 925, Unit C, No. 37 Baosh West Rd., Longteng Community, Shiyao Street, Bao'an District, Shenzhen, Guangdong, China	annie_chow@hsy-lighting.com	+86 755 8528 1291	https://hsy-led.com/
SHENZHEN HUICHENG TONG E-COMMERCE CO.	No. 1027 Shennan East Rd., Wenhua Community, Shenzhen, Guangdong, China	n/a	n/a	n/a
SHENZHEN JINGSLI PACKAGING CO., LTD.	Room 511, 5/F, Building B, Getalong Comprehensive Building, No. 227 Bulong Rd., Shenzhen, Guangdong, China	n/a	n/a	n/a
SHENZHEN SHIYUN TECHNOLOGY CO., LTD.	Room 405, Building 1, Star Center, No. 1 Baodan Rd., Longjiang District, Shenzhen, Guangdong, China	Tammy@shiyuniot.com	+86 18026731539	https://szshiyun.en.alibaba.com/company_profile.html
SHENZHEN ZENGSHANGFANG TRADE CO., LTD.	Xixiang, Bao'an District, Shenzhen, Guangdong, China	n/a	n/a	n/a
SHIJIAZHANG HONTA IMPORT & EXPORT	2, 0708 Yihong Building, 256 Zhonghua North St., Xinhua District, Shijiazhuang, Hebei, China; Room 412, Building A, Jincheng Business Center, No. 488 Zhongshan Rd., Shijiazhuang, Hebei, China	n/a	n/a	https://sjzhuatao.en.made-in-china.com/
TOP PROMOTIONAL PRODUCTS	Room 3220, Nanwang Jie Building, Shennan Rd., Futian District, Shenzhen, Guangdong, China	n/a	n/a	n/a
TP-LINK LIANZHOU CO., LTD.	9F, East Wing, South Section, Shennan Rd., Shenzhen 518100, Guangdong, China	n/a	n/a	n/a
UNION PACKAGING GROUP LIMITED	1802, 18/F, Sunbeam Commercial Building, Hong Kong	n/a	n/a	n/a
VALUESPOT TRADING COMPANY LIMITED	7/F, Kowloon Building, 555 Nathan Rd., Kowloon, Hong Kong	n/a	n/a	n/a
WEIFANG HONGBO PACKAGE CO., LTD.	Gongyei Rd., Weicheng District, Weifang, Shandong 261052, China	info@hongbopackaging.com	+86 536 825 0310	http://hongbopackaging.com/
WESTRON INFOCOMM (ZHONGSHAN) CORP.	No. 38 Keji East Rd., Zhongshan Torch Development Zone, Zhongshan, Guangdong 528400, China	n/a	n/a	n/a
XIAMEN CAREYOU TRADING CO., LTD.	Room 1804, No. 163 East Canglin Yili, Haicang District, Xiamen, Fujian, China	n/a	n/a	n/a
XIAMEN DING BROTHERS CRAFTS CO., LTD.	746 Fengnan Rd., Tong'an District, Xiamen, Fujian, China	n/a	n/a	n/a
YANGJIANG HUARUN HOUSEHOLD COMPANY	Unit 2, Room 502, Ruli Xuan, Huagaoxin Road 9, No. 48, Yangjiang, Guangdong, China	n/a	n/a	https://yjhhousehold.en.alibaba.com/company_profile.html
YANTAI XIANGYU PACKAGING CO., LTD.	635 Fushan Rd., Yantai, Shandong, China	n/a	n/a	https://xiangyubaozhuang.en.alibaba.com/company_profile.html
YIWU HONGWAN IMPORT AND EXPORT CO.,	Room 421-1, Building B, Yiwu Port, No. 266 Chengxin Ave., Futian Street, Yiwu, Jinhua, Zhejiang, China	n/a	n/a	n/a
YIWU LU SHOVEL IMPORT AND EXPORT CO.	Room 103, 2F, Building 3, No. 352 Shenzhou Rd., Houzhai Street, Yiwu, Jinhua, Zhejiang, China	n/a	n/a	n/a
YIWU RUSH TRADING COMPANY	Room 202, Unit 1, Building 72, Shitacou Village, Jiangdong Street, Yiwu, Jinhua, Zhejiang, China	n/a	n/a	n/a
YIWU YINGCHUAN E-COMMERCE CO. LTD.	Room 104, 2F, Building 3, No. 352 Shenzhou Rd., Houzhai Street, Yiwu, Jinhua, Zhejiang, China	n/a	n/a	n/a
YIWU YINGPAN E-COMMERCE CO. LTD.	Room 103, 2F, Building 3, No. 352 Shenzhou Rd., Houzhai Street, Yiwu, Jinhua, Zhejiang, China	n/a	n/a	n/a
ZHEJIANG SIX SENCES FURNITURE CO.	Room 1015, Building 4, Wanda Plaza, No. 755 Hongji St., Jindong District, Jinhua, Zhejiang, China	info@jhsigma.com	+86 13566783806	https://www.sixsences.com/
ZHONGSHAN HAIKUO TRADING CO., LTD.	Room 1804, Nanhua Cailong Building, No. 9 Cailong Rd., West District, Zhongshan, Guangdong, China	n/a	n/a	n/a
ZHONGSHAN SILKUN TRADING CO., LTD.	Room 1407, Zhisan Building, No. 31 Longjing South Rd., Shiqi District, Zhongshan, Guangdong, China	n/a	n/a	n/a

Malaysian Producers/Exporters				
Company Name	Address	E-Mail	Phone Number	Website
BROWN PULP PAC SDN BHD	No 1, Jalan Taming 12, Taming Jaya Industrial Park, 43300 Balakong, Selangor, Malaysia	admin@b-pac.com.my	6010-3650072	https://b-pac.com.my/
CNC PAPER INTERNATIONAL SDN. BHD.	45, 1, Taman Setia Budi, 08600 Sungai Petani, Kedah, Malaysia	contact@cncpaper.com.my	60 4-381 8400	https://cncpaper.com.my/
ERCBOX PACKAGING SDN BHD	No.35 Jalan P10/16, Taman Industri Selaman, 43650 Bandar Baru Bangi, Selangor, Malaysia	sales@ercbox.com	6019-805 0506	https://www.ercbox.com
FEIHONG MALAYSIA SDN BHD	No. 3A & 3B, Jalan Sungai Chandong 26/KS11, Kawasan Perindustrian Pulau Indah, 42920 Pelabuhan Klang, Selangor, Malaysia	n/a	60 3-9076 9080	http://www.chinagiftwrap.com/
HIRO FOOD PACKAGES MANUFACTURING SDN. BHD.	9, Persiaran Selangor, Seksyen 15, 40200 Shah Alam, Selangor, Malaysia	info@hirofood.com	60 3-5524 8888	https://www.hirofood.com/
K.S.K. FASTPRINT SDN. BHD.	3, Jalan Perusahaan Jelutong 1, Fortune Park, 11600 Jelutong, Pulau Pinang, Malaysia	sachindevsivakumar@gmail.com	604-288 7774	https://www.kskprint.com/
KGW LOGISTICS (M) SDN BHD	6, Jalan Pemaju U1/15, Hicom-Glenmarie Industrial Park, 40150 Shah Alam, Selangor, Malaysia	corporate@kgwlogistics.com	60 3-7842 8899	https://www.kgwlogistics.com/
KOOKA PAPER MANUFACTURING SDN. BHD.	Lot 840 & 841, Jalan Subang 7, Taman Perindustrian Subang, 47500 Subang Jaya, Selangor, Malaysia	export@kookapaper.com	60 18-233 2788	https://www.kookapaper.com/
LH PLUS SDN. BHD.	9, Persiaran Hemisfera, Seksyen U5, 40150 Shah Alam, Selangor, Malaysia	general@lhplus.com	60 3-7846 2888	https://www.lhplus.com/
LOPIE PAPER MALAYSIA SDN BHD	Lot 202-A, Jalan 4, Kawasan Perusahaan Ringan Bakar Arang, 08000 Sungai Petani, Kedah, Malaysia	Roger@lopiepaper.com	86 20 87425822	https://www.lopiepaper.com/en/
MAH SING HEALTHCARE SDN BHD	Lot 6478, Lorong Sungai Puloh/KU6, Kawasan Industri Sungai Puloh, 42100 Klang, Selangor, Malaysia	inquiry@mshealthcare.com	60 3-3396 2288	https://www.mshealthcare.com/
MALEX PAPER PRODUCTS SDN BHD	55, Jalan Murni 4, Taman Perindustrian Murni Senai, 81400 Senai, Johor, Malaysia	customer@malex.com.my	607-5909 888	https://www.malex.com.my/
MELCOM MANUFACTURING (M) SDN. BHD.	1808, Jalan Industri 2, Bukit Panchor Industrial Park, 14300 Nibong Tebal, Pulau Pinang, Malaysia	n/a	n/a	n/a
U FORMULA SDN. BHD.	No. 7-1, 1st Floor, Lorong Batu Nilam 34B, Bandar Bukit Tinggi 2, 41200 Klang, Selangor, Malaysia	esunny0513@gmail.com	60 19-441 1332	http://www.ingenuitytrade.com/
YEONG CHAUR SHING PAPER MILL SDN	KL Office: No. 15 & 17, Jalan Suppiah Pillay, Batu 3, Off Jalan Sultan Azlan Shah, 51200 Kuala Lumpur, Malaysia; Factory: Lot 736, Mukim Tampoi Krubong, Melaka Tengah, 75250 Melaka, Malaysia	enquiry@ycspapermill.com	60 3-4043 6691	https://www.ycspapermill.com/

Company Name	Address	E-Mail	Phone Number	Website
AB OFET Ambalaj San. ve Tic. Ltd. Şti.	İkinci OSM Mah., Arayama Sanayi Sitesi, 4/2 D Blok No:39, Başakşehir, İstanbul, Türkiye	Not publicly displayed	+90 212 546 49 21	http://www.abofetambalaj.com/turkisiceporters1
AD DESIGN OYA CENDİ	Koşuykaya Mah., Arayama San. No:12, 4/2, Kapı No:4, Kadıköy, İstanbul, Türkiye	n/a	n/a	n/a
ADRIK PAZAR LULU RASGON NIGELAT SANAYI VE TICARET LIMITED SİRKETİ	Yeni Paşa B Blok Kat: No:11, İsmet İnönü Bld., Kurtuluş Meydanı, Ankara 06010, Türkiye	info@adriktartarport.com.tr	+90 244 299 29 20	http://www.adriktartarport.com.tr
Aldora Kuru Ambalaj San. ve Tic. Ltd. Şti.	5. Organize Sanayi Bölgesi, Boşlukçay Mah., 503 Yeni Sok. No:17, Selçuklu, Konya, Türkiye	big@adcoambalaj.com.tr	+90 312 501 05 85; +90 351 939 15 55	http://adcoambalaj.com.tr/adcoambalaj
Alan Ofet Matbaacılık Ambalaj Sanayiye Ticaret Ltd. Şti.	Hacıyolcu Mah., 32/05 Sok. No:8, Meriçkafeside, Denizli, Türkiye	info@alanofet.com.tr	+90 258 1279 09 11; +90 553 363 87 22	https://www.alanofet.com.tr/trakitofet1
Ankutan Artaşık Kuru Sanayi Oğlak Mukavva Kağıt Ticaret A.Ş.	Arayama Organize Sanayi Bölgesi 2. Kısım 22. Cad. No:6, 07360 D/Emekliyatı, Ankara	info@arkutan.com	+90 2386 234 3737; 4442 257	https://www.arkutan.com/ankutan1
Aras Ambalaj Sanayi ve Ticaret A.Ş.	Örnekteki Mah., Hacılar San. Cad. No:52, Arslanbeyi, İstanbul 34855, Türkiye	aras@aras.com.tr	+90 212 596 04 25	https://www.aras.com.tr/tr-tr/AnalizAyra
AZMİR OIDA SAN. TIC. LTD. ŞTİ.	Barbaros Hayrettin Paşa Mah., 1968 Şiş, A ve B Blok Sitesi, Sultan Köpü, İstanbul 34006, Türkiye	ekbasan_sistem@arbasan.com.tr	n/a	n/a
BAHET KADITULIK VE AMBALAJ MALZEMELERİ İHR. SAN. VE TIC. A.Ş.	Seitimpapa Mah., 50/08 Sok. No:2, Silivri, İstanbul 34590, Türkiye	info@peromcup.com.tr	+90 212 283 54 09; +90 212 283 54 12	http://peromcup.com.tr/en/
BARUTLAR ÜRÜNLERİ İHRACAT SAN. VE TIC. A.Ş.	2. Organize Sanayi Bölgesi, Durum Bası Bld. No:24, Başgörmü, Gaziantep, Türkiye	bahargit@bahargit.com.tr	+90 342 337 49 60	n/a
BIRLIK YAZILIM VE İNŞAATLARI İHRACAT SAN. VE TIC. A.Ş.	Örnekteki Mah., Adnan Menderes Bld., Oğlak Yayı A Blok Kat: No:10, Yeniyapı, Hürriyet, Türkiye	n/a	n/a	n/a
BYRATKARZADE CENİZOLUK LOJİSTİK	Fatih Mah., Esik Çukuk Yolu Cad. No:13, O2, Ağaçlı, İstanbul, Türkiye	n/a	+90 532 667 51 83	http://www.by-peak.com
BEYÖZAN AMBALAJ SANAYİ VE TİCARET Lİ	607, Yayıncı Mah., Eynesok Sok., Nilüfer, Bursa 16100, Türkiye	n/a	+90 533 03 93 06	n/a
Brosan Packaging A.Ş.	Tatlıca Mah., Fırat Cad., Mahmudiye Sok. No:4, Avcılar, İstanbul 34011, Türkiye	contact@brosanpack.com	+90 513 301 54 17	https://brosanpack.com/brosan-packing/
Büyük Yayıncı Kağıt ve Karton Kuru ve İhracat A.Ş. / Yasanlar Group	Organize Sanayi Bölgesi 3. Kısım 2. Cad. No:14, Örnekteki Mah., Ankara	info@yasanlar.com.tr	+90 244 241 54 52; +90 242 244 19 67	https://www.yasanlar.com.tr/yasanlar/
CAMPACK PACKAGING / CAMPACK OYUNCAK TİCARET A.Ş.	İTOB Mah., 103/36 Sok. No:20, Tekeles, Menderes, İzmir 35471, Türkiye	info@campackambalaj.com.tr	+90 232 790 44 48	https://www.campackpackaging.com/campackpackaging/
CMT GROUP İTHALAT İHRACAT EMLAK VE TİCARET LIMITED SİRKETİ	Hacılar Mah., Hacılar Yolu Cad. No:3/1, Oğlak, Başgörmü, İstanbul, Türkiye	CALIEM@9070@gmail.com	+90 552 880 09 19	n/a
DER PLASTİK SAN. VE TİC. LTD. ŞTİ.	115 Temiz Mah., Evren Mah., Cami Yolu Cad. No:3/1, Örnekteki Mah., Başgörmü, İstanbul, Türkiye	info@der.com.tr	+90 212 585 56 42; +90 212 567 78 07	https://der.com.tr/en/home/
DEKPAK AMBALAJ İTHALAT İHRACAT KURU VE TİC. LTD. ŞTİ.	Karşıyaka Mah., İsmet San. No:54/77, Başgörmü, İstanbul, Türkiye	info@dekpa.com.tr	+90 262 271 45 85	https://dekpaambalaj.com
DEKPAK AMBALAJ İTHALAT İHRACAT KURU VE TİC. LTD. ŞTİ.	Ali Erhan OSM Mah. / ASO 1. OSM, Avar Cad. No:36, P.06605, Sincan, Ankara, Türkiye	info@ekstus.com	+90 312 356 40 38	https://www.ekstusambalaj.com
ECAMBALAJ OIDA SAN. VE TIC. LTD.	11073 Sok. No:5, Türkiye (locality not stated on accessible official page)	info@ekimpak.com	+90 532 340 84 17	https://www.ekimpak.com/ekimpak
Ekimpak / Ekim Packaging	Yeni Mah., Ekol Sok. No:1, Silivri, İstanbul 34670, Türkiye	info@ekcofset.com	+90 212 066 01 01	https://www.ekcofset.com/tr/en/TR/ANASayfa
EKOİL OFSET MATB. TEĞİSLEN İHRACAT SAN. VE TİC. LTD. ŞTİ.	Organize San. Bölgesi, Nispetiye Köyü, 4. Blok No:22, Ahi Evran OSM Başgörmü, İstanbul 34490, Türkiye	info@ekoset.com.tr	+90 212 478 34 02; +90 212 671 34 96	n/a
EVEREST İTHALAT İHRACAT LTD. ŞTİ.	Örnekteki Mah., Adnan Menderes Bld., Oğlak Yayı A Blok Kat: No:10, Yeniyapı, Hürriyet, Türkiye	info@everestexport.net	+90 558 897 93 23	https://www.everestexport.net/en/
FAKUL AMBALAJ İTHALAT İHRACAT SAN. VE TİC. LTD. ŞTİ.	H. Edip Adnan Mah., Sultan Şiş No:22, Şiş, İstanbul, Türkiye	muhasebe@fakulambalaj.com.tr	+90 342 337 26 00	n/a
FATMAKALAMBAK LTD. ŞTİ.	Bağcı Mah., OSM 2. Bölge, 83/01 Nolu Cad. No:2, Şiş, Ankara, Gaziantep, Türkiye	info@fatmakalambak.com.tr	n/a	http://fatmakalambak.com/index.english.html
FERTPAK PAKET PAKETİNG	Ekim Mah., Hazal Sitesi, 0. Blok, Kat: 2/1, 2/1, İstanbul, Türkiye	info@fertpak.com	+90 510 44 41 45	https://www.fertpak.com
FİREK AMBALAJ LTD. ŞTİ.	Arayama Mah., 20. San. Akıncı Sanayi Sitesi, A Blok, Esmeyurt, İstanbul, Türkiye	export@fircapack.com	+90 510 44 41 45	https://www.fircapack.com
GÖNÇAY PAKETİNG	Beşir Mah., 24. San. No:1/1 P.59600, Esmeyurt, İstanbul, Türkiye	info@goncaypackaging.com	+90 550 732 46 29	

EXHIBIT I-16

U.S. Importers				
Company Name	Address	E-Mail	Phone Number	Website
A1 EXPRESS USA LLC	176 Bolton Rd., P1, Vernon, CT 06066	n/a	n/a	n/a
ACCELERATED GLOBAL SOLUTIONS INC	3333 New Hyde Park Rd., Ste. 316, Hyde Park, NY 11042	commercial@agslogistics.com	(516) 820-3000	https://accgs.com/
AD CREATIVE SOLUTIONS LLC	340 Pierce Ave., North Mankato, MN 56003	dawn@creativeadsolutions.com	(507) 344-8464	https://www.creativeadsolutions.com/
AIRBORNE EXTREME	730 S. Range Ave., Ste. 28, Denham Springs, LA 70726	n/a	(225) 999-1999	https://airbornex.com/
ALYSSAS BAKERY LLC	4300 US Hwy. 1, Ste. 203-176, Jupiter, FL 33477	office@alyssascookies.com	(561) 401-2873	https://alyssascookies.com/
AMERICA TRADE LLC	221 Commerce Rd., Fairfield, NJ 07004	info@americatrade.us	n/a	https://www.americatrade.us/
AMZ BESTAR INCI C/O FBA	21590 Needham Ranch Pkwy., Santa Clarita, CA 91321	n/a	n/a	n/a
ANC PACKAGING, INC	20 Hamilton Ave., Princeton, NJ 08542	ji.cumhur@ancpackaging.com	(201) 658-0921	https://www.ancpackaging.com/
ANGIE PERUVIAN KITCHEN, INC (DBA 17 RESTAURANT)	1751 Alton Rd., Miami Beach, FL 33139	17restaurant@gmail.com	(305) 672-0565	https://17restaurant.com/
ANP USA INC	114 Essex St., Ste. 205, Rochelle Park, NJ 07662	n/a	n/a	n/a
APUSIC INC	433 N. Baldwin Park Blvd., City of Industry, CA 91746	support@apsicstore.com	(909) 960-3333	https://www.apsicpackaging.com/
ATLANTIC BREAD LLC	P.O. Box 20035, Atlanta, GA 30325	abc@atlantabread.com	n/a	https://atlantabread.com/
ATOMIC TRADING INC	1942 Broadway St., Ste. 314C, Boulder, CO 80302	ATOMIC-TRADING@outlook.com	(626) 940-9385	n/a
AURRA INTERNATIONAL LLC	1968 Yellow Rose Ln., Santa Rosa, CA 95407	n/a	n/a	n/a
AVATEK INC.	15110 Don Julian Rd., City of Industry, CA 91746	n/a	(626) 961-5708	n/a
AVCO INDUSTRIES	120 Windsor Pl., Central Islip, NY 11722	sales@avcoboxes.com	(631) 966-0654	https://www.avcoboxes.com/
BARAKAH KABAB INC	17630 W. Warren Ave., Detroit, MI 48228	n/a	(313) 485-8922	n/a
BARZINJI INC	35 Exploration, Irvine, CA 92618	n/a	n/a	n/a
BASHIER WHOLESALE DISTRIBUTORS CORP	229 N. Route 303, #102-103, Congers, NY 10920	Ebashier@bashierwholesale.com	(845) 786-5150	https://www.bashierwholesale.com/
BEATO CAPITAL INC.	601 E. Acacia Ave., Glendale, CA 91205	info@beatocapital.com	n/a	https://beatocapital.com/
BELLA ITALIA FOOD SERVICE LLC	2031 S. Fayetteville St., Asheboro, NC 27203	Andrew.Bellaitalia@gmail.com	(336) 310-4971	https://bellaitaliafoodservices.com/
BEVELINI USA INC.	604 E. Basin Rd., New Castle, DE 19720	n/a	n/a	n/a
BRADSHAW INTERNATIONAL INC.	10760 4th St., Ste. 100, Rancho Cucamonga, CA 91730	n/a	(909) 476-3884	https://bradshawhome.com/
BREMBO SOURCE LLC	3365 Dewberry Rd. NW, Acworth, GA 30101	n/a	n/a	n/a
CHANGQIN LLC	1401 21st St., Ste. 5470, Sacramento, CA 95881	n/a	n/a	n/a
COLIN FREEMAN 13 INTERNATIONAL INC	5900 Balcones Dr., Ste. 100, Austin, TX 78731	n/a	n/a	n/a
CONNECTICUT IMPORT LLC	76 Lanesville Rd., New Milford, CT 06776	n/a	n/a	n/a
CONTINENTAL FOOD SERVICE SUPPLY LLC	Continental Innovation Center, 700 Stephenson Hwy., Troy, MI 48083	LetsConnect@ContinentalServes.com	(248) 414-1700	https://www.continentalserves.com/
CO-PACK INC.	330 Tumbull Canyon Rd., City of Industry, CA 91745	Inquiry@copackinc.com	(626) 333-0030	https://copackinc.com/
COSMIC PET LLC	1315 W. MacArthur Rd., Bldg. 300, Wichita, KS 67217	CosmicCS@cosmicpet.com	(800) 456-5778	http://www.cosmicpet.com
CPM WHOLESALE LLC	14-25 Plaza Rd., Fair Lawn, NJ 07410	n/a	n/a	n/a
CREATING BRAND LEGACY	370 Franklin Tpke., Mahwah, NJ 07430	info@cblworld.com	(201) 252-8960	https://www.cblworld.com
CROC LINERS & AUTO PARTS LLC	500 Algonquin Rd., Mt. Prospect, IL 60056	n/a	(847) 378-8843	https://crocliner.com/
DECHO SPEED INC	3048 S. Hacienda Blvd., Hacienda Heights, CA 91745	n/a	n/a	n/a
DINO FERRARI INC	No address provided	n/a	n/a	n/a
DOGAN PIZZA INC.	595 Old Country Rd., Plainview, NY 11803	n/a	(212) 810-1334	n/a
E&S FOOD, INC.	64 S. Jefferson Rd., #1, Whippany, NJ 07981	customerservice@esfood.com	(855) 797-7999	https://esfood.com/
EL PALENOQUE PIZZERIA CORP.	801 E. 25th St., Hialeah, FL 33013	info@palenquerestaurant.com	n/a	https://palenquepizzeria.com/en/
EXPEDITORS INTERNATIONAL WAREHOUSE	3545 Factoria Blvd. SE, Bellevue, WA 98006	n/a	(206) 674-3400	https://www.expeditors.com
EXPERT WHOLESALE SUPPLY	2301 Washington Ave., Philadelphia, PA 19146	n/a	(267) 687-2701	https://www.expertwholesalesupply.net/home
F&F PIZZERIA INC.	459 Court St., Brooklyn, NY 11231	ffrestaurant@frankspm.com	(718) 254-0327	https://www.fnfpizzeria.com/
FANTANSTIC TRADING INC	2108 N St., Ste. N, Sacramento, CA 95816	n/a	n/a	n/a
FH TUSAN INC	1246 Vernon Way, El Cajon, CA 92020	n/a	(619) 757-6632	n/a
FILAGA CHELSEA MARKET LLC	75 9th Ave., New York, NY 10011	info@filaga.com	(646) 678-5382	https://www.filaga.com
FIVE TALENTS LLC	P.O. Box 145, West Chesterfield, NH 03466	cleristis@gmail.com	(603) 762-6860	n/a
FOOD SERVICE CONTAINERS, LLC	6540 W. Market St., Greensboro, NC 27409	n/a	n/a	https://www.foodservicecontainers.com/
FOUR SEASONS PACKAGING CORP.	70 Onderdonk Ave., Ridgewood, NY 11385	n/a	(718) 418-7788	n/a
FREEPORT PAPER INDUSTRIES	120 Windsor Pl., Central Islip, NY 11722	fpaper@optonline.net	(631) 851-1555	https://www.freeportpaper.com/
FX PACKAGING	2117 Attiburgh Blvd., West Melbourne, FL 32904	n/a	n/a	n/a
GALATA TRADERS CORP	21820 Penny Oak Ter., No. 100, Sterling, VA 20164	info@galatatraders.com	(571) 325-9192	https://galatatraders.com/
GLOBAL ETRADE SERVICES INC	19800 MacArthur Blvd., Ste. 300, Irvine, CA 92612	northamerica@crimsonlogic.com	(905) 763-6887	https://www.crimsonlogic.com/
GLOBAL IMPORT SOLUTIONS LLC	18445 Edison Ave., Chesterfield, MO 63005	n/a	(636) 730-3707	https://weareacr.com/
GOHERE LLC	113 Conifer Ct., Inlet Beach, FL 32461	n/a	(305) 999-5595	n/a
GOZNEY INC US	2700 Rasmussen Rd., L-50, Northfield Park City, UT 84098	inquiries@gozney.com	n/a	https://us.gozney.com/
GREENSMART PAPER CO	1 Comac Loop, Unit 6, Ronkonkoma, NY 11779	n/a	(888) 473-6768	n/a
HARPER MATERIALS LLC	4205 W. 23rd Ave., Denver, CO 80212	n/a	n/a	n/a
HIVE V.O.C. LLC	4500 Clark Rd., Sarasota, FL 34233	support@hivevoc.com	(833) 448-3862	https://hivevoc.com/
HONEY BADGER CA LLC	1620 Venice Blvd., Apt. 208, Los Angeles, CA 90291	n/a	(310) 467-5994 / (424) 259-0504	https://honeybadgerca.com/
HOT TOPIC INC.	18305 E. San Jose Ave., City of Industry, CA 91748	n/a	n/a	n/a
HUACHEN TRADING INC	2501 Chatham Rd., Ste. R, Springfield, IL 62704	n/a	n/a	n/a
HUMBLE PIES HAWAII LLC	550 Paiea St., Honolulu, HI 96819	sheldon66@gmail.com	(808) 833-5588	https://bigkahunaspihawaii.com
IFA TRADING LLC	114 Essex St., Ste. 205, Rochelle Park, NJ 07664	n/a	(973) 869-7333	n/a
IL LAGO TRATTORIA CORP	2475 NW 95th Ave., #8, Doral, FL 33172	n/a	(305) 571-6191	https://ilagotrattoria.com

U.S. Importers				
Company Name	Address	E-Mail	Phone Number	Website
IMPRESSIONS LICENSING	390 Starke Rd., Carlstadt, NJ 07072	roxanne.gray@impressionslicensing.com	n/a	n/a
INTERNATIONAL FOOD CREATIONS, LLC	2390 Crenshaw Blvd., Ste. 803, Torrance, CA 90501	n/a	(877) 468-3003	https://intfoodcreations.com/
JAK GLOBAL TRADE CORPORATION	150 N. Michigan Ave., 35th Fl., Chicago, IL 60601	n/a	n/a	n/a
JET PAPER BAGS LLC	22 Riverview Dr., Unit 4B, Wayne, NJ 07470	info@jetpaperbags.com	(973) 406-7113	https://jetpaperbags.com/
JUCHENG TRADING INC	36 S. 18th Ave., Ste. D, Brighton, CO 80601	n/a	n/a	n/a
KIRVEM LLC (ADA MEDITERRANEAN BRASS	14-25 Plaza Rd. N., Unit 6, Fair Lawn, NJ 07410	n/a	(201) 791-2222	https://www.adabrasserie.com/
LINKS OF LONDON	369 Lexington Ave., 6th Fl., New York, NY 10017	n/a	n/a	n/a
LIVE LARGE DISTRIBUTION (AKA AMISH PRETZEL CO)	2807 Marina Dr., Elkhart, IN 46514	info@amishpretzelco.com	(888) 833-4607	https://amishpretzelco.com
LIVENSIS GROUP LIMITED	30 N. Gould St., Ste. 24831, Sheridan, WY 82801	sales@customer.livensis.com	90 (532) 290 1098	https://livensis.com.tr/
LOLLICUP USA INC.	6185 Kimball Ave., Chino, CA 91708	info@lollipup.com	(626) 965-8882 / (800) 857-1988	https://lollipupstore.com/ http://karatpackaging.com
MB TECHNOLOGIES LLC	500 Westover Dr., #9994, Sanford, NC 27330	n/a	n/a	n/a
MEDIA DIFFERENCE MARKETING GROUP LL	12 Shagbark Way, Fairport, NY 14450	n/a	(585) 503-9263	https://www.mediadifference.com/
MEGA PLASTIC GROUP	14A Van Dyke Ave., New Brunswick, NJ 08901	info@megapg.net	(212) 970-8949	https://www.megapg.net/
MEM CORPORATION	3017 Candlelite Dr., Spring Hill, TN 37174	n/a	n/a	n/a
MERANA ENTERPRISES INC.	8940 Lurline Ave., Chatsworth, CA 91311; 11547 Tuxford St., Sun Valley, CA 91352	info@usprintnpack.com	(818) 761-5555	https://usprintnpack.com
MODE IMPORTS	4301-A Industry Dr. E., File, WA 98424	n/a	n/a	https://modeimports.com/
MORPHY INC	146 Duane St., Apt. 5A, New York, NY 10013	n/a	n/a	n/a
NEMCO FOOD TRADING INC	301 Meuse Argonne, Hicksville, OH 43526	n/a	(419) 542-7751	https://nemco.com/contact/
NEW YORK PIZZA	665 W. Tennyson Rd., Hayward, CA 94544	n/a	(510) 246-3785	https://www.newyorkpizzahayward.com/
NEXUS WORLD INC	41-14B Main St., Ste. B26, Flushing, NY 11355	n/a	n/a	n/a
NITROGEN YOGURT AND ICE CREAM LAB	15348 NW 79th Ct., Miami Lakes, FL 33016	n/a	(786) 353-9775	https://www.frostyslab.com/
NORTHSTAR PACKAGING LLC	P.O. Box 313, Mt. Pleasant, SC 29465	sales@northstarpkg.com	(843) 856-5001	https://www.northstarpkg.com/
NOVO BOX LLC	3 Sperry Rd., Ste. B, Fairfield, NJ 07004	nero@novoboxes.com	(848) 360-1757	https://www.novoboxes.com/
NYMETRO PROMOTION&PRINTING	456 Nordhoff Pl., 2nd Fl., Englewood, NJ 07631	info@nymetropromo.com	(212) 518-8897	https://www.nymetropromo.com/
OCEAN TRADE LLC	605 N. 41st St., Allentown, PA 18104	n/a	n/a	n/a
OCHOA DAIRY PRODUCTS CORP	2133 Britannia Blvd., San Diego, CA 92154	contacto@comercializadorachoa.com	+52 (664) 627-0436	https://alimentososchoa.com/sobre-nosotros/
ONE TO SEVEN INC.	145 El Tuque Industrial Park, Ponce, PR 00728	n/a	(787) 290-5625	n/a
PARATHAS AND PLATTERS INC	329 Main St., Hackensack, NJ 07601	deradegrill@gmail.com	(201) 250-8255	https://www.parathasandplatters.com/
PEAK MEDIA	4917 S. Sherwood Forest Blvd., Baton Rouge, LA 70809	n/a	n/a	n/a
PENGCHENG TRADING INC	36 S. 18th Ave., Ste. D, Brighton, CO 80601	n/a	n/a	n/a
PERMASTEEL, INC.	100 Exchange Pl., Unit A, Pomona, CA 91768	service@permasteel.life	(888) 287-0735	https://permasteel.life/
PIZZA BOX BY TURCATO DBA PIZZA BX	5140 Edwin St., Hamtramck, MI 48212	vdake@pizzabx.com	(866) 887-2286	https://pizzabx.com/
PIZZA BOXES INC	41 E. Barclay St., Hicksville, NY 11801	Laura@PBISales.com	(516) 937-1133	https://www.pbisales.com/
PIZZA NOVO	6711 S. Fry Rd., Katy, TX 77494	info@pizza-novo.com	(281) 395-6400	https://www.pizza-novo.com/
PLANET PIZZA PR LLC.	Villa Justicia K30 Calle Rivera, Carolina, PR 00985	n/a	n/a	n/a
PLUSPACK CORP.	17 Arcadian Way, Ste. 108, Paramus, NJ 07652	n/a	n/a	n/a
POLYMELT MANUFACTURING INC	12515 Citypark Dr., Ste. 300, Missouri City, TX 77489	n/a	n/a	n/a
PREMIER PACKAGING	4301 Produce Rd., Louisville, KY 40218	n/a	(800) 518-6305	https://prempack.com/
PROJECT GROUP USA LLC.	404 Washington Ave., Ste. 650, Miami Beach, FL 33139	n/a	(917) 885-1395	https://projectgroupusa.com/
PUMP QUALITY INTERNATIONAL INC	4610 S. Ulster St., Ste. 150, Denver, CO 80237	n/a	n/a	n/a
RAXWELL INDUSTRIES LLC.	20 Fairbanks, Ste. 173, Irvine, CA 92618	info@raxwellinc.com	(949) 528-3572	https://raxwellinc.com/
ROYAL ISLAND LLC	16 Kolopua Pl., Wailuku, HI 96793	n/a	n/a	n/a
RUNCENT TRADE INC	5030 Boardwalk Dr., Ste. 818, Colorado Springs, CO 80919	n/a	n/a	n/a
SATURN FREIGHT SYSTEMS - DFW	221 W. Exchange Ave., Fort Worth, TX 76164	n/a	(877) 740-8667	http://saturnfreight.com/
SHARKNINJA OPERATING LLC	89 A St., Needham, MA 02494	n/a	(617) 243-0235	https://www.sharkninja.com/
SHUREPRINT	1318 N. Spring St., Unit B, Los Angeles, CA 90012	n/a	(310) 971-9571	https://www.shureprint.com/
SOLID TRADE LLC	141 Lanza Ave., Bldg. 18-D, Garfield, NJ 07026	sales@solidtradellc.com	(201) 773-0882	https://solidtradellc.com/pages/
SORRISO, INC	Lomas de Carolina K4 Calle Monte Membrillo, Carolina, PR 00987	sorriso.inc@hotmail.com	(787) 762-1122	n/a
SPECTRUM ENTERTAINMENT LIMITED	221 River St., 9th Fl., #9071, Hoboken, NJ 07030	n/a	n/a	n/a
ST INTERNATIONAL SUPPLY INC.	300 McGaw Dr., Fl. 1, #2, Edison, NJ 08837	n/a	(732) 777-1525	https://sticorpusa.com/
STAR TRADE PROMO INC	169 Commack Rd., Commack, NY 11725	info@startradepr.com	(347) 833-8281	https://startradepr.com/
SYNERGYMC LLC	7 Scaleby Ln., West Chester, PA 19382	n/a	n/a	n/a
TAI KING INC	41 Edison Ct., Apt. F, Monsey, NY 10952	n/a	n/a	n/a
TAQUERIA LOS PEREZ LLC	3418 Annapolis Rd., Halethorpe, MD 21227	taquerialosperezMD@gmail.com	n/a	https://www.taquerialosperez.com/
TASTY PIZZA INC	5423 Leavenworth St., Omaha, NE 68106	n/a	n/a	n/a
TEAM THREE GROUP LIMITED, LLC	420 Clover Mill Rd., Exton, PA 19341	hello@amercareroial.com	(800) 666-6655	https://primewareproducts.com/
TEH TUNG CORPORATION	8728 Dice Rd., Santa Fe Springs, CA 90670	mhuynh@tehtungusa.com	(562) 903-8000	https://www.tehtung.com/
THE GOLDEN MULE LLC	1809 Conowingo Rd., Rising Sun, MD 21911	n/a	n/a	n/a
THE MARTIN-BROWER COMPANY LLC	6250 N. River Rd., Ste. 9000, Rosemont, IL 60018	mbcommunications@reyesholdings.com	n/a	https://martinbrower.us/
THE ONE AND ONLY PIZZA	30150 Briggs Rd., Menifee, CA 92584	n/a	n/a	n/a
THE TRIO COMPANY FOOD LLC	4215 Park Ave., Union City, NJ 07087	n/a	n/a	n/a
THIN AIR BRANDS, LLC	5332 Talavera Pl., Parker, CO 80134	info@ThinAirBrands.com	(303) 593-2950	https://thinairbrands.com/
TIANSHUN INTERNATIONAL LIMITED	244 Madison Ave., Ste. 1666, New York, NY 10016	n/a	n/a	n/a

U.S. Importers				
Company Name	Address	E-Mail	Phone Number	Website
TIMETOTRADE LLC	417 Totowa Rd., Paterson, NJ 07512	n/a	n/a	n/a
TOP SUPPLIES LLC	7882 Galesburg Pl, Dunn Loring, VA 22027	n/a	(847) 637-6520	n/a
TRADE DROID INC	1160 W. Rincon St., #102, Corona, CA 92878	n/a	n/a	n/a
TRIANGLE GLOBAL SOURCING	1635 Eagle Harbor Pkwy., Ste. 4, Fleming Island, FL 32003	triangleglobalsourcing@gmail.com	n/a	n/a
US GLOBAL VIVA PACKAGING INC.	489 Getty Ave., Clifton, NJ 07011	info@usglobalvivapack.com	(646) 755-1043	https://usglobalvivapack.com/
US XXXP TECHNOLOGY CO LTD	108 E. 16th St., #601, New York, NY 10003	n/a	n/a	n/a
VEGAS ENTERPRISES LLC	4865 S. Pecos Rd., Ste. 2, Las Vegas, NV 89121	n/a	(702) 972-5522	n/a
VERDE WINSIGHT GROUP INC	15578 Hellman Ave., Chino, CA 91710	n/a	(909) 591-3331	https://verdewinsight.com/
VISION CUSTOMIZATION	8 Park St., B14, Spring Valley, NY 10977	n/a	n/a	n/a
VITORY TRADING INC	7901 4th St. N., Ste. 300, St. Petersburg, FL 33702	n/a	n/a	n/a
WISMETTAC ASIAN FOODS, INC.	13409 Orden Dr., Bldg. J, Santa Fe Springs, CA 90670	n/a	(562) 802-1900	https://wismettacusa.com/
WORLD BRANDS, INC.	11870 Hialeah Gardens Blvd., #129B, Hialeah Gardens, FL 33018	n/a	(305) 639-8100	n/a
XIAMEN TANTUXINXIJISHU YOUXIANGONGS	11263 Oleander Ave., Fontana, CA 92337	n/a	n/a	n/a
ZAZA GRILL N KEBAB LLC	812 Main St., Toms River, NJ 08753	info@zazagrillandkebab.com	(732) 333-1414	https://zazagrillandkebab.com/
ZEEBAR INC	72 Summit Ave., Ste. 103, Montvale, NJ 07645	n/a	(845) 579-6244	https://www.zeebar.us/
ZHONG FLY INC	98 Wadsworth Blvd., #127-3255, Lakewood, CO 80226	n/a	n/a	n/a

EXHIBIT I-17

ENTIRE EXHIBIT NOT CAPABLE OF PUBLIC SUMMARY

EXHIBIT I-18

Negligibility Calculation

U.S. Imports, HTS 4819100020

Source	August 2025 - July 2026	Share
China	5,687,692	6.9%
Malaysia	11,574,373	14.0%
Turkey	33,221,610	40.1%
World Total	82,912,657	100.0%

EXHIBIT I-19



Smurfit Westrock to close Atlanta plant, affecting 55 workers

The closure is slated for completion early in 2026 as part of the company's ongoing optimization efforts.

Published Nov. 10, 2025



Katie Pyzyk
Lead Reporter



Courtesy of Smurfit WestRock

Smurfit Westrock plans to close a Georgia facility and permanently lay off 55 employees, according to a worker adjustment and retraining notification filed with the state on Nov. 10.

The corrugated food service packaging plant in Atlanta is slated to close around Jan. 5, 2026, according to the WARN. A company spokesperson confirmed the January timeline via email.

This facility will close “as part of ongoing optimization,” the spokesperson said. “Production will transition to an improved Smurfit Westrock facility with expanded production capabilities, optimized logistics and certified to SQF standards.”

Smurfit Westrock has carried out a series of closures and layoffs since forming as a company last July via Smurfit Kappa's acquisition of WestRock. CEO Tony Smurfit said during the company's October earnings call that total company headcount has been reduced by 4,500 since the combination. He indicated nine facility closures had been announced as part of the optimization, and the company would continue to “rightsize the business by closing down inefficient or loss-making operations.”

In October, Smurfit Westrock announced its intention to close a corrugated sheet and box facility in California, affecting 141 employees. The company disclosed in August that it would close a corrugated products plant in Cedar Rapids, Iowa, affecting about 100 employees. In April, Smurfit Westrock announced four closures — in St. Paul, Minnesota; Forney, Texas; and Germany — that resulted in a total of approximately 650 employees cut.

The company is expanding production elsewhere. Recently it announced a nearly \$19.3 million investment to boost production capacity by 50% at its corrugated plant in Saltillo, Mississippi. During the company's May earnings call, executives described a plan to invest in 25 more efficient converting machines, with implementation slated to begin next year.

EXHIBIT I-20

Packaging manufacturer to lay off 91, close Mass. facility

Tréa Lavery

March 23, 2026 • 1 min read



A global company that manufactures paper packaging products is preparing to close one of its facilities in Massachusetts and lay off 91 people.

Smurfit Westrock will permanently close its factory at 365 Audubon Road, Wakefield starting on May 18, according to a [Massachusetts Workers Adjustment Retraining Notice](#) filed with the state on March 18.

The Wakefield facility manufactures corrugated boxes and packaging for regional customers, according to the company's [website](#). It has additional Massachusetts locations in Springfield and Devens.

Smurfit Westrock operates more than 500 facilities and employs more than 97,000 around the world, according to its website. The business was formed in 2024 when European company Smurfit Kappa Group merged with North American firm WestRock Company.

A spokesperson for Smurfit Westrock said in a statement Monday morning that the closure was part of the company's "optimization efforts" and its production work would be moved to other facilities, but did not provide a reason for the closure.

EXHIBIT I-21



Automation takes center stage at Smurfit Westrock 'superplant' in Wisconsin

The automation and robotics allow the Pleasant Prairie facility to use about 60% of the labor of a traditional box plant, while the scale enables service to the greater Chicago region.

Published May 7, 2026



Katie Pyzyk
Lead Reporter



Smurfit Westrock's corrugator line is seen inside the box plant in Pleasant Prairie, Wisconsin, which began production in May 2025. The facility was designed to have a high amount of advanced automation and manufactures about 3 billion square feet of corrugated boxes annually. Permission granted by Smurfit Westrock

"Super" is an adjective that gets thrown around casually in modern society, but Smurfit Westrock's leadership believes it's a suitable label for its year-old, large-scale corrugated box manufacturing plant in Pleasant Prairie, Wisconsin.

It was the first facility that top management colloquially called a "superplant" during a groundbreaking in June 2024 under WestRock, which months later became Smurfit Westrock. Now the box plant is among an elite few in the company's network that bear the descriptor. Such hubs are designed to serve key regions of high demand and volume, in lieu of having multiple nearby plants. For instance, SW closed a legacy plant in nearby North Chicago, Illinois, around the time the superplant opened.

So what specific qualities define a superplant? The designation signifies scale, a high level of advanced automation and the

capability to meet all of a complex market's corrugated needs.

The \$136 million, 595,000-square-foot Wisconsin facility produces approximately 3 billion square feet of corrugated boxes annually, "which is about three times a typical corrugated box plant today," said Don Sparaco, Smurfit Westrock president of corrugated packaging for North America. The plant was completed in April 2025, and production began the following month; product lines include pre-print, white top, recycled board, kraft, high performance liners, wet strength and food packaging. Up to 200 people now work there.

The plant manufactures a variety of boxes to satisfy the growing demand in the Great Lakes market. These include mid-sized slotted cartons like moving boxes, rotary die-cut boxes like those for pizza, jumbo boxes for industrial use such as with chemicals and produce, and small options for healthcare and beauty.



The Pleasant Prairie facility has rotary die-cut machinery for making products such as pizza boxes.

Katie Pyzyk/Packaging Dive

Location is a key attribute this plant has going for it.

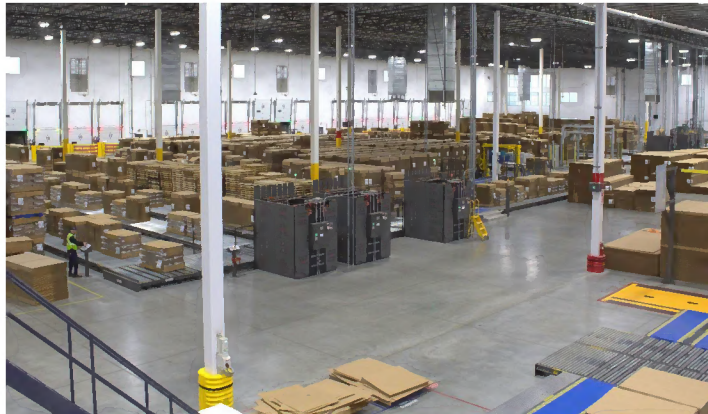
Pleasant Prairie's pastoral name contrasts with the industrial boom the village has experienced during the last 15 years as major companies create and expand their campuses along Interstate 94. The village is home to Uline's corporate headquarters, Amazon has an ever-growing footprint there, and confectioner Haribo placed its first U.S. manufacturing facility in Pleasant Prairie in 2023.

Around the same time as the plant groundbreaking in 2024, the Wisconsin Department of Transportation granted the village \$885,000 for a project to develop a rail spur to connect the box plant site with the Union Pacific mainline. Smurfit Westrock uses

this rail access for inbound shipments of raw materials such as paper and starch. WisDOT also noted the investment's capability to attract other businesses with rail needs to the area.

The box plant is strategically positioned along the Wisconsin-Illinois border to serve the greater Chicago area, which is considered one of the top regions in the United States for corrugated box consumption — second only to the greater Los Angeles area.

This consumption is driven in part by Chicago being the nation's food and beverage manufacturing capital, home to giants including Conagra, Kraft Heinz and Mondelēz International. Chicago is also one of North America's main transportation hubs and the largest and busiest freight rail hub in the U.S., handling an estimated one in four of the nation's freight trains daily.



A superplant has the scale to meet a complex market's various box needs, such as for food, healthcare and industrial applications.

Katie Pyzyk/Packaging Dive

In short, an enormous proportion of America's consumer goods and raw materials travel through Chicago — and they tend to do so in corrugated boxes.

"It was certainly one area that we've had on our radar to modernize our assets, to optimize our footprint and to serve existing as well as new customers," Sparaco said. "Investing in the Great Lakes area was the right thing to do."

Pleasant Prairie is one of only two facilities in North America that Smurfit Westrock refers to as a superplant, with the other in Longview, Washington. The latter opened in November 2023, and Smurfit Westrock incorporated dozens of best practices learned there when developing Pleasant Prairie.

"A lot of them have to do with the engineering and the flow of the material through the plant," Sparaco said. "Every time we do a modernization or an expansion or a greenfield plant, we make sure that we document all of those learnings."



Conveyorization is a key element in Smurfit Westrock's newest plants, referring to automated material-handling systems that move product through the plant. Reducing how much employees manually move board lowers safety risks.

Katie Pyzyk/Packaging Dive

Automatic pilot

The level of automation at the plant allows Smurfit Westrock to use less labor in operations than at traditional box plants while improving safety and consistency.

"A facility engineered like we have here in Pleasant Prairie uses about 60% of the labor that a traditional box plant would use because of that automation," Sparaco said.

One of the prominently visible examples of modern equipment is the Para Crab roll stock delivery system. The floor-mounted system picks rolls and transports them from storage to the single facer without human interaction. It operates on standard floor tracks to allow for manual delivery during equipment maintenance downtime.

The space requirements for Para Crab mean it isn't suitable for every plant. However, where possible, "every time we modernize or conveyorize a facility now, we add that technology," Sparaco said. The machinery's precision helps to cut down on damage to paper rolls caused by human error.



The Para Crab roll stock delivery system reduces product damage and improves plant safety.

Permission granted by Smurfit Westrock

The 132-inch wide BHS corrugator is about 80% automated, said Eugenia Rivero Loyola, senior manager of financial planning and analysis. The system produces corrugated at high speeds while monitoring processes and control functions, including for temperature, steam and tension.

The “zero defect” system for quality control automatically kicks out defective products in real time. Issues worthy of ejection include folds, splices or bonding deficiencies with the corrugated.

Employees oversee operations from an elevated, monitor-filled control room that overlooks the corrugator. The automation simplifies operators’ jobs and the ability to get ahead of any issues, Rivero Loyola explained. It alerts operators if conditions fall outside of set parameters at various points on the line faster than a human on the floor could spot potential problems and radio details back to the control room.

“Let’s say that you’re running something successfully, but on the rest of the back end you’re starting to see warp. They can actually click a check mark and make the paper look like the one that you liked,” she said. “It’s a very cool adjustment of tension and warp.”

On the converting side, Pleasant Prairie has two Mitsubishi Heavy Industries EVOL Flexo Folder Gluers that include automation and robotics. At maximum speed, they can produce up to 350 boxes per minute. The plant also has a Ward 66-inch Flexo Folder Gluer and a BGM Jumbo Flexo Folder Gluer with die-cut capabilities. The two Bobst rotary die cutters can operate at a maximum speed of up to 12,000 feeds an hour.

Automation also comes into play for some less prominent processes like with the stitching wire machine that reinforces box strength, especially for industrial or other heavy-duty applications.

“There are little things that you don’t think about capability-wise that just make the difference with the quality of the box that we can provide the customer,” Rivero Loyola said.

Automation also is peppered throughout pizza box production, including for manufacturing the white top and at the rotary die-cut machine. As with producing other products, robotics are incorporated for certain pizza box packing and sealing functions.

“We’re very excited about all this technology that we’re able to support our team with,” Rivero Loyola said.



Packing and sealing are some of the plant's processes that use robotics, including for stacks of pizza boxes.

Katie Pyzyk/Packaging Dive

Safety net

Pleasant Prairie has integrated robotics throughout the plant, especially for a variety of back-end processes including packing, sealing and palletizing. This isn’t just for speed and efficiency enhancement, but also to improve safety.

Pointing to the Para Crab moving toward roll stock, Sparaco said, “It’s a much safer work environment where you don’t have that pedestrian-clamp truck interface.”

The Raptor bundle handling and load forming robot automatically grabs incoming bundles of finished products from a conveyor and builds stacks according to the inputted pattern. When it achieves the required layers, the stack is discharged. Using robotic

palletizers eliminates the need for human fork truck drivers to combine multiple units, or for manual handling.

“It really makes it safer. You don’t have employees lifting or straining to move things,” Rivero Loyola said.



Back-end automation is incorporated throughout the plant. The Raptor robot bundles box stacks.

Katie Pyzyk/Packaging Dive

“Conveyorization” is the name of the game at Pleasant Prairie, broadly referring to integrated, automated material-handling systems that move product through the plant. This includes conveyors, such as the blue ones that transport stacks to employees for inspecting and marking, but also other automated transfer and handling solutions.

“Everything in this plant, including all of the corrugated board that comes off of our corrugator, is transported by belted conveyor,” Sparaco said. “So we no longer require people to manually transport board from point A to point B.”

The corrugator also has some specialized features, such as sound enclosures to reduce the work environment noise levels, Sparaco explained. Another intentional plant design feature to improve employee safety and comfort is that “we also do our best to engineer the airflow,” he said, noting that “especially where summers are hot and muggy, there’s a better airflow and temperature gradient inside the facility.”

“All of those little things make a difference — especially at the elevated speeds that our equipment runs here,” Sparaco said.



The high level of automation at the Pleasant Prairie plant handles many repetitive or hazardous functions so employees can focus on higher value-add work.

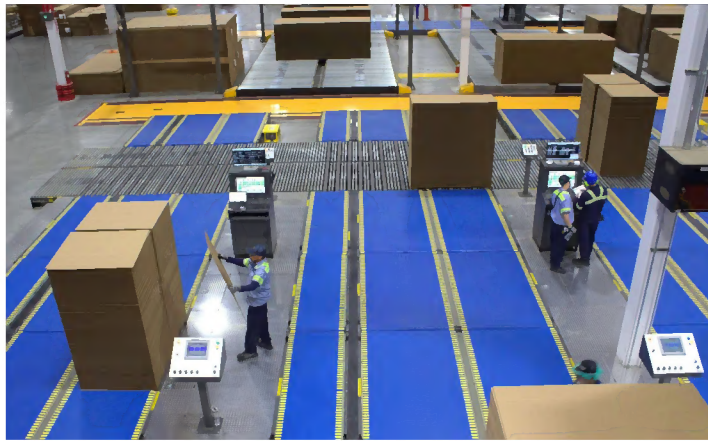
Katie Pyzyk/Packaging Dive

Getting up to speed

To accompany all the investments in automation at Pleasant Prairie, Smurfit Westrock also invest in employee training. The company's goal was to move humans into higher value-add positions while letting the equipment do the repetitive and hazardous work.

"We not only train them in a classroom setting so they can learn the basics about the machinery and how to safely operate it, but then we do hands-on training out on the machinery itself," Sparaco said. "Every piece of equipment is just a little bit different" and requires fresh training, even for operators who have worked on similar units.

The typical onboarding process there takes three weeks. A lot of employees don't need to start from scratch because they came to the Pleasant Prairie site from other Smurfit Westrock facilities, including the previous North Chicago site.



Employees go through classroom and hands-on training to learn how to properly operate the modern machinery in the box plant.

Katie Pyzyk/Packaging Dive

“Many of our employees transferred into this plant and already had a great background and understanding of how to manufacture packaging,” Sparaco said. But even so, “we know there’s a learning curve — and sometimes it’s a steep learning curve — as we bring in new machinery, and we qualify that machinery.”

Leadership also prioritizes developing a positive employee culture, he said.

“That’s the culture that we want to have: where people are excited to come to work and they feel good about what they accomplish and the team they’re on. They feel like they belong,” Sparaco said.

EXHIBIT I-22



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Product prices are falling! Capacity utilization is only 70%! Gaoyi Packaging is being questioned: The rationality of related-party transactions is under scrutiny.

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Less than a month after its prospectus was accepted, Guangdong Gaoyi Packaging Technology Co., Ltd. (hereinafter referred to as "Gaoyi Packaging") received an inquiry letter from the Beijing Stock Exchange. The Beijing Stock Exchange issued 10 questions, mainly focusing on core issues such as the rationality of its related-party transactions, the sustainability of its performance growth, and the authenticity of its high proportion of overseas sales.

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Gaoyi Packaging specializes in paper-based printed packaging for consumer electronics, small appliances, e-cigarettes, and alcoholic beverages. Its main products include premium color boxes, cartons, trays, instruction manuals, labels, and various paper bags. The company experienced a decline in sales revenue to clients such as Microsoft, leading it to explore growth opportunities in alcoholic beverage packaging and personal care small appliances. The Beijing Stock Exchange has requested clarification on whether there is a shrinking downstream

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collect



share

During the reporting period, Gaoyi Packaging's overseas main business revenue accounted for more than 40%, and the company was asked to explain whether the high proportion of overseas revenue was reasonable, and the authenticity and rationality of sales to major overseas customers.

Regarding the reasonableness of related-party transactions, the Beijing Stock Exchange requires the company to explain the reasons and reasonableness for its simultaneous purchases and sales to Dongguan Bogda and the year-on-year increase in related-party purchase amounts, whether the related-party transactions are fair and genuine, whether the company and Dongguan Bogda are independent, the background and reasonableness of the actual controller's transfer of its Dongguan Bogda shares, and whether there are any potential benefit arrangements.

Gaoyi Packaging has overlapping customers and suppliers. The Beijing Stock Exchange requires it to explain the names of the entities that are both customers and suppliers, the basis and fairness of their pricing, the rationality and necessity of these entities simultaneously purchasing from and selling to the company, whether this is in line with industry practice, and whether there are any related party relationships or other interest arrangements between the company and these entities.

During each reporting period, sales revenue from Gaoyi Packaging's color boxes accounted for over 60% of its main business revenue, while the unit price of color boxes and instruction manuals showed a downward trend. The Beijing Stock Exchange requested an explanation of the reasons for the decline in the unit price of color boxes and instruction manuals, the impact of the price reduction on the company's profitability, and whether the company possesses bargaining power. Further explanation was also required regarding the sustainability of the company's performance growth and whether there is a risk of performance decline or significant fluctuations.

Gaoyi Packaging's overall gross profit margin is higher than the average level of comparable companies. In 2022 and 2023, the company's export gross profit margin was higher than its domestic gross profit margin. In 2024, the domestic gross profit margin increased significantly and exceeded the export gross profit margin. The Beijing Stock Exchange requires an analysis of the reasons for and the rationality of the significant difference in gross profit margins between domestic and overseas sales, and the reasons for the significant increase in the domestic gross profit margin in 2024, which exceeded the export gross profit margin. Furthermore, considering factors such as customer loyalty, market competition, and the company's bargaining power, an analysis is needed to determine whether the gross profit margin faces a downward risk.

Gaoyi Packaging's accounts receivable have increased year after year, reaching 435 million yuan at the end of 2024. Accounts receivable with an aging of less than one year accounted for more than 99% of the total. Therefore, the company was



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Gaoyi Packaging plans to raise 580 million yuan in this offering, of which 130 million yuan will be used to supplement working capital. During the reporting period, the company's capacity utilization rates were 81.10%, 69.93%, and 72.27%, respectively. At the end of 2024, the company's cash and cash equivalents balance was 114 million yuan.

In response, the Beijing Stock Exchange requested clarification on whether the new production capacity, output, and operating scale of the projects funded by the IPO have sufficient market absorption capacity, whether there is a risk of overcapacity or idle capacity, whether the design of the fundraising scale is prudent and reasonable, and the necessity of supplementing working capital.

Source: Duchuang Finance

Report/Feedback

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To make insightful and witty comments

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EXHIBIT I-23



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Source: Zhejiang Branch of Export-Import Bank of China

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Export-Import Bank of China Zhejiang Branch supports private enterprises in "going global" and promoting the optimization of global production capacity layout.

Recently, the Zhejiang Branch of provided financial services to Zhejiang Jingxing Paper Industry to support the construction of its Phase II project of a 1.4 million-ton pulp and paper project in Malaysia, which includes a 600,000- ton-per-year high-grade kraft linerboard production line (PM3). This initiative aims to help the company " go global " and accelerate the optimization of its global production capacity .



This project aims to further expand the company's overseas production capacity, leverage the comparative advantages of overseas raw materials, and enhance its market share in high-end corrugated paperboard and the international competitiveness of private foreign trade enterprises. With the branch's financial support, the company will build one of the largest single-machine production lines for packaging paper in Southeast Asia, equipped with the most advanced production equipment, to expand its business. Simultaneously, the company will create nearly 300 jobs, making a positive contribution to local economic and social development. The implementation of this project is a powerful measure by the branch to increase support for private enterprises after successfully supporting the company's previous projects and achieving the expected results. It is of great significance for promoting the deep integration of private enterprises into the Belt and Road Initiative and their active participation in international competition. (Text by Feng Baihui and Song Dongxiao ; Photos provided by Zhejiang Branch of Export - Import Bank of China)

[Editor: Song Yue]

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EXHIBIT I-24

Manufactured with High Technology

Paper & Corrugated Cardboard Products



With our 250,000 m² integrated production facility, we offer environmentally friendly paper and packaging solutions to more than 50 countries.

With our 100% recycling-focused structure, international quality certifications, and strong export network, we are pioneers in sustainable production.

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The Power of Partex in Numbers

Our sustainable production approach yields measurable results. We grow by protecting nature, adding value to society, and building trust on a global scale.



Waste Paper Processing
Capacity (in tons)

240,000

Ton Fluting Testliner Processing Capacity

100,000

Corrugated Cardboard Processing
Capacity (in tons)

30,000

Ton of Cleaning Paper Processing
Capacity



Our Journey to Add Value to Paper

Our production journey, which began in Kayseri in 1996, has today become a symbol of sustainable production with our 250,000 m² integrated facility. With high technology, environmentally friendly production processes, and our global export strength, we bring to life an approach that "adds value to paper" every day.



100%

**+50 Countries**

A strong export network reaching all corners of the world and a reliable brand reputation.

Our brand is included in the **Turquality** Brand Support Program.

We empower sustainable production with comprehensive solutions.

In our integrated facility, we offer environmentally friendly, high-quality, and innovative solutions in the production of corrugated cardboard paper, tissue paper, corrugated cardboard sheets, and boxes.

Corrugated Cardboard Paper Production

With our KM4 lines, we ensure environmentally friendly production by manufacturing Fluting, Testliner, and Imitation Kraft products from 100% recycled materials.

We work towards a sustainable future with energy efficiency and zero waste principles.

**Corrugated Cardboard Production**

With our fully equipped corrugated line boasting a monthly production capacity of 8,000 tons, we produce high-quality sheets and boxes.



Production of Cleaning Paper

With our KM3 machine, we produce cleaning paper from 100% cellulose. We develop soft-textured and highly absorbent products that meet hygiene standards for both indoor and outdoor use.



With our wide product range and integrated production infrastructure, we offer high-strength and sustainable paper solutions tailored to the needs of different sectors.

With our production capacity ranging from corrugated cardboard to tissue paper rolls, we support the efficiency and product safety of businesses in many sectors, from industry to e-commerce, from food to automotive.



We are taking our journey from sustainable production to international success to the world through trade fairs, awards, and events.

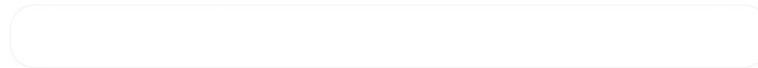
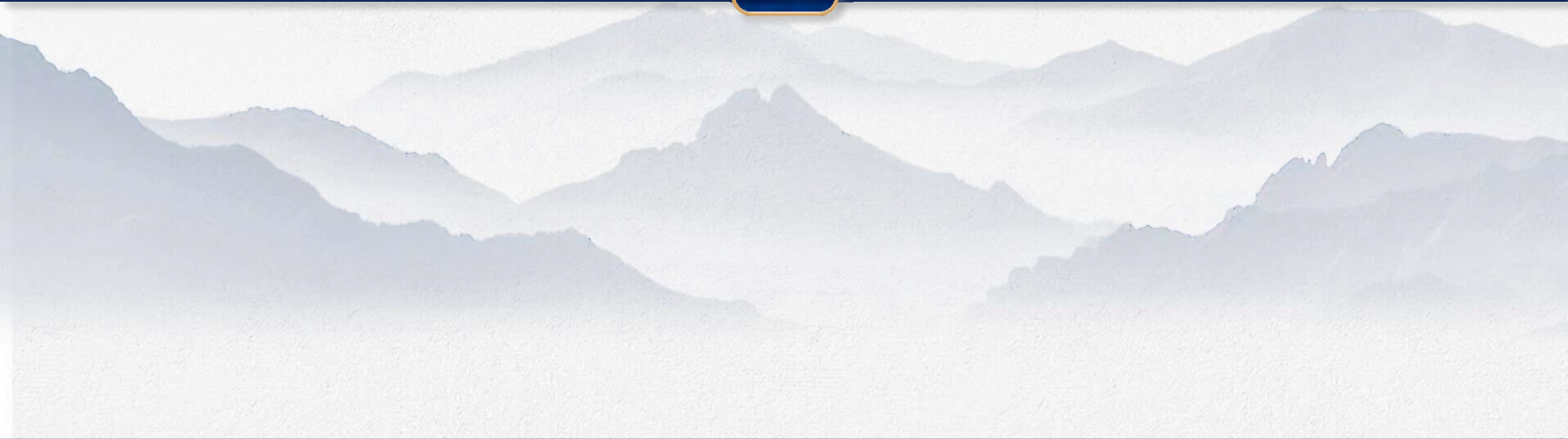


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With a solid foundation, we have become a company that is both pragmatic and idealistic.

Longpai is a company renowned for its global marketing prowess. After nineteen years of unremitting efforts, it has built a systematic global marketing system, establishing nearly 10 sales companies worldwide, and exporting to over 20 countries. Its main clients are well-known enterprises, primarily in the United States, Canada, Australia, Europe, Japan, and Hong Kong, and mainly large chain enterprises. In 2023, it ranked first in exports of similar products to the United States and Australia.





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- Sustainability
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EXHIBIT I-26



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Qianlin always adheres to the business philosophy of "innovation, enterprising, people-oriented, honest and trustworthy". Products are selling more than 50 countries in the world. Our main market is North America and the Middle East.

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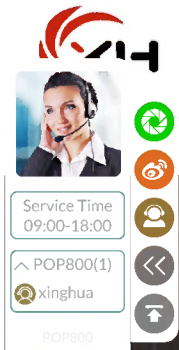
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