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Ambassador Robert E. Lighthizer
U.S. Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20006

PUBLIC DOCUMENT

Re: **USTR-2018-0026 –Proposed Modification of Action Pursuant to Section 301: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation: Written Comments of CropLife America and RISE (Responsible Industry for a Sound Environment)®**

Dear Ambassador Lighthizer:

CropLife America (“CLA”) and RISE (Responsible Industry for a Sound Environment)® (“RISE”) respectfully submit these written comments regarding the proposed action, under Section 301 of the Trade Act of 1974, in unfair and burdensome trade practices advanced by the Government of the People’s Republic of China.¹ CLA and RISE appreciate the Administration’s desire to counteract practices that unfairly burden or restrict commerce. However, the imposition of tariffs on chemicals and chemical products used in controlling pests will have profound, negative effects for U.S. pesticide businesses, U.S. jobs in the pesticide industry, U.S. farmers, and individual U.S. consumers, and will not meaningfully advance the Administration’s goals of encouraging China to abandon its unfair practices. As discussed below:

- **The proposal will raise prices for American farmers, nurseries, and others who apply pest control products, as well as their downstream consumers.**

¹ *Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 33,608 (Office of the United States Trade Representative July 17, 2018).

- **The proposal will negatively impact jobs across the American pesticide and agricultural supply chain.**
- **The burdens of the tariffs will be disproportionately felt by U.S. companies and consumers.**
- **The tariffs will not meaningfully affect the unfair acts, practices, and policies that the Administration seeks to change.**

CLA and RISE oppose the imposition of the proposed tariffs as to such products, and particularly the application of additional duties to Chinese pesticide products covered by the 144 tariff provisions listed in **Appendix A**.

I. INFORMATION ON CLA, RISE, AND THEIR MEMBERSHIP

CLA and RISE are national trade associations that represent manufacturers, formulators, and distributors of pesticide products.

CLA, established in 1933, represents the developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. CLA's member companies produce, sell and distribute virtually all the crop protection products used by American farmers, ranchers and landowners to ensure healthy crops and strong yields. RISE is the national not-for-profit trade association representing more than 220 producers and suppliers of specialty pesticide and fertilizer products to both the professional and consumer markets. RISE member companies manufacture more than 90 percent of domestically-produced and -formulated specialty pesticides used in the United States, including a wide range of products used on lawns, sport fields, and golf courses, and otherwise used to protect public health, safety, and infrastructure. Together with their individual members, CLA and RISE work to ensure that their member companies can provide the important tools that support the United

States' safe food supply, protect public health, and enhance greenspaces by reducing the risks posed by destructive pests and plant diseases.

While these comments are filed on behalf of CLA and RISE, we understand that certain of our individual members, including but not limited to ADAMA USA, Albaugh, LLC, Nufarm Americas, Inc., SipcamRotam LLC, and Tessenderlo Kerley, Inc., are filing separate comments that will provide additional detail on the negative effects that the proposed tariffs will have for their operations. CLA and RISE support these individual member comments for the reasons explained below. CLA and RISE further draw USTR and the Administration's attention to the testimony provided by CLA member companies such as Albaugh LLC, as well as by other companies that stand to be affected by the Administration's proposal to duty pesticides.²

II. THE PROPOSED TARIFFS WILL NEGATIVELY IMPACT CLA AND RISE MEMBERS

Pesticides are crucial to a number of American industries. American farmers depend on them to grow healthy, safe row crops, fruits, nuts, and vegetables as food, and for use in food products, for Americans and consumers around the world. Without modern crop protection technology, insect pests, weeds, and crop diseases would reduce crop yields substantially, and reduce the availability of American-grown farm and food products. Similarly, public health and safety depends on pesticide products that control disease-carrying mosquitos and ticks, control weeds on roads and utility rights-of-way, and reduce risks from pests in and around homes and structures.

² Transcript, USTR, 301 Committee, Section 301 Tariffs Public Hearing (Monday, Aug. 20, 2018) at 135-146, 170-174; Transcript, USTR, 301 Committee, Section 301 Tariffs Public Hearing (Wednesday, Aug. 22, 2018) at 79-89.

Modern pesticide products are typically manufactured using one or more active ingredients – generally known in the industry as “technical” chemicals – blended with inactive ingredients, application adjuvants, and other excipients in a process known as formulation. The finished, formulated products are then applied to American crops ranging from asparagus to yams, as well as to turf and ornamental plants and in various non-agricultural use sites, allowing U.S. farmers to produce healthy, bountiful yields year after year, and Americans to enjoy safe, nutritious foods, and safe and properly-maintained public and private spaces.

The production and supply chain for both technical chemicals and formulated pesticide products is global, relying on both U.S. and imported materials and operations. While U.S.-based operations play an important part in the supply chain, many input chemicals and formulated products used in American crop protection and non-agricultural settings are available only from import sources. Congress has repeatedly recognized this in its Miscellaneous Tariff Bill (“MTB”) process, which authorizes temporary duty reductions on goods that are not produced in the United States, and which are needed by U.S. manufacturers and downstream users, such as farmers, to advance U.S. manufacturing and agricultural production. Indeed, the latest MTB covers numerous technical pesticide active ingredients, as well as formulated pesticides.³

The tariff codes subject to the current proposal include those covering major pesticidal chemicals used in U.S. agriculture, mosquito control, vegetation management, structural pest control, and for turf and ornamental applications. The chart below shows the most-used active chemicals used in various U.S. pesticide applications, along with the applicable eight-digit tariff

³ For a non-exhaustive selection of pesticidal, insecticidal, herbicidal, and fungicidal products recognized in the current MTB, see H.R.4318 - Miscellaneous Tariff Bill Act of 2018 (115th Cong.) at §§ 323, 325, 326, 328-340, 379-383, 385, 386, 455-470, 473-497, 520-530, 537, 544-548, 563-581, 605-628, 808-906.

lines for each.⁴ All but one of these lines are subject to the Administration's proposal.

Technical Chemical	Tariff Line	Covered?
<i>For Agricultural Uses</i>		
Glyphosate	2931.90.90	✓
Atrazine	2933.69.60	✓
Metolachlor-S	2924.29.47	✓
Dichloropropene	2903.29.00	✓
2,4-D	2918.99.20	✓
Metam (Metam Sodium)	2930.20.90	✓
Acetochlor	2924.29.47	✓
Metam Potassium	2930.20.90	✓
Chloropicrin	2904.91.00	✓
Chlorothalonil	2926.90.21	✓
<i>For Home and Garden</i>		
2,4-D	2918.99.20	✓
Glyphosate	2931.90.90	✓
MCP	2918.99.14	✗
Pendimethalin	2921.49.50	✓
Carbaryl	2924.29.47	✓
Acephate	2930.90.43	✓
Permethrin	2916.20.50	✓
Dicamba	2918.99.20	✓
MCPA	2918.99.20	✓
Malathion	2930.90.42	✓
<i>For Industry/Commercial/Government Use</i>		
Glyphosate	2931.90.90	✓
Chlorothalonil	2926.90.21	✓
2,4-D	2918.99.20	✓
Pendimethalin	2921.49.50	✓
Prodiamine	2921.59.80	✓
Sulfuryl fluoride	2812.90.00	✓
Acephate	2930.90.43	✓
Simazine	2933.69.60	✓
Bti	3808.91.50 ⁵	✓
Bifenthrin	2916.20.50	✓

⁴ U.S. Environmental Protection Agency, Pesticides Industry Sales and Usage: 2008-2012 Market Estimates (2017) at pp. 14-16. While we here focus on the top ten agricultural pesticides, the EPA's report provides data on the top twenty-five. Of those active ingredients for agricultural uses ranked 11-25, CLA and RISE's research indicates that all but paraquat and chlorpyrifos are classifiable in provisions covered by the Administration's current proposal.

⁵ Bti, or *Bacillus thuringiensis*, is a bacterium, the toxins of which are insecticidal. U.S. Customs & Border Protection has classified insecticides that use Bti as their active ingredient in Heading 3808, under the tariff line currently numbered as 3808.91.50. See Headquarters Ruling Letter 954108 (July 18, 1995). Cultures of live Bti bacteria, or the pure toxins derived therefrom, are classifiable in 3002.90.51, which is not subject to the current proposal.

And while these actives are the most widely used in American crop protection and in specialty pesticide products, dozens more that are covered by the current proposal are needed for specific crops, plants, and pest-eradication programs. For example, based on only a partial review of the active ingredients classifiable under covered tariff provisions, CLA and RISE have identified many beside those identified above that are registered for use with important crops such as apples, corn, cotton, oranges, potatoes, and soybeans.⁶

Crop	Actives Subject to Proposal	Example Active	8-Digit Classification
Apples	15	Simazine	2933.69.60
Barley	17	Azoxystrobin	2933.59.15
Cabbage	13	Clomazone	2934.99.15
Field Corn	23	Dichlormid	2924.19.80
Cotton	23	Fludioxonil	2934.99.12
Oranges	12	Imidacloprid	2933.39.27
Peanuts	17	Lambda Cyhalothrin	2926.90.30
Potatoes	20	Linuron	2924.21.16
Rice	12	Metalaxyl	2924.29.47
Soybeans	24	Oxyfluorfen	2909.30.30
Wheat	18	Tetraconazole	2933.99.22

Again, the actives named above, and indeed, all of those that CLA and RISE's top-level review identified, are just a subset of those that stand to be covered by the current proposal.

China is an increasingly important source for these and other technical chemicals used in U.S.-based formulation operations, as well as for formulated products. Working with their members, CLA and RISE identified 120 ten-digit tariff lines covered by the Administration's proposal under which crop protection products were imported from China in 2017.⁷ In 2017, \$2.36 billion in goods were imported from China under these provisions, representing more than

⁶ See **Appendix C** (Crop Identification for Selected Active Ingredients).

⁷ This list is based on members' responses to a survey regarding tariff lines used in importing, as well as CLA and RISE's own review of the tariff schedule for tariff lines applying specifically to pesticides. This list is not exhaustive of all tariff provisions under which crop protection products could be classified, but is meant to illustrate the potential effects of the Administration's proposal.

a quarter of imports overall.⁸ China's role in supplying the U.S. market is even more prominent when one looks at individual codes covering important actives. For example, Chinese imports accounted for more than three quarters of 2017 imports under 2933.69.6021, HTSUS, the tariff provision most often cited by CLA and RISE members as applying to their imports, and which covers pesticide active ingredients such as atrazine, simazine, metribuzin, hexazinone, and propazine. Notably, all of these chemicals are included in the current MTB.⁹ Likewise, China was the source of 87% of 2017 U.S. imports of fungicidal, technical chemicals under 2926.90.2100, HTSUS, another provision commonly cited by CLA and RISE members, which covers important fungicides such as chlorothalonil, which is also included in the MTB.¹⁰

Even where China is not the sole global producer of an active chemical, it should not be assumed that global capacity elsewhere is sufficient to fill any gap left by Chinese imports, or that such capacity could be brought to bear quickly. Existing producers may not have available and idle capacity sufficient to fill demand. Further, some producers with non-Chinese manufacturing operations use these solely to supply their own related formulation operations and do not sell to unrelated parties. Importantly, chemicals cannot be imported or formulated in the United States without time-consuming and expensive EPA clearances – which must be updated for any new factories or sources of active ingredients. Further, changes in formulation or

⁸ See **Appendix B** (Tariff Line-Specific Import Data). **Appendix A** contains a larger list of 144 tariff lines subject to the Administration's proposal, and which CLA, RISE, and their members would like removed from the Administration's proposal. This list includes codes under which imports from China entered in 2018, though not in 2017, as well as codes in which CLA, RISE, and their members believe Chinese imports could be classified in the reasonably foreseeable future.

⁹ H.R.4318 - Miscellaneous Tariff Bill Act of 2018 (115th Cong.) at § 544-545, 547-548, 550.

¹⁰ See **Appendix B** (Tariff Line-Specific Import Data); see also H.R.4318 - Miscellaneous Tariff Bill Act of 2018 (115th Cong.) at § 360.

sourcing often necessitate testing to ensure that there are no compatibility or efficacy impacts resulting from the change.

The potential burden of the proposed tariffs on the U.S. crop protection industry – and on the farmers and downstream consumers that the industry serves – is staggering. Based on 2017 imports from China under the tariff codes identified by CLA, RISE, and their members, the pesticide industry would face increased costs of \$591 million per year were the current proposal to go into effect, just on those tariff provisions identified in **Appendix B**. While individual companies will make their own decisions about how best to respond to the tariffs, to the extent that they attempt to absorb the tariffs, either in whole or in part, this will inevitably affect their own employment numbers in the United States, and their ability to fund U.S.-based research and development. And to the extent that they are unable to absorb the tariffs, the increased costs could negatively impact jobs at U.S.-based formulation operations and may result in cost increases to downstream consumers, particularly farmers and pesticide applicators. In turn, farmers, pesticide applicators, and others will be forced to make tough choices regarding the cost of crop protection inputs and chemical pest management tools, the expected return on investment, and the impact on plant yields and pest control given reduced product use. Ultimately, the burden of the tariffs will be felt in the quality, quantity, and cost of the products that U.S. farmers and pesticide applicators are able to offer to U.S. consumers, as well as to consumers around the world.

III. THE PROPOSED TARIFFS WILL DISPROPORTIONATELY BURDEN U.S. INTERESTS

The U.S. burdens of the tariffs will be disproportionate to the burdens felt by the Chinese Government, whose trade practices and policies the proposed tariffs are meant to affect. For

example, according to United Nations data, China exported more than \$4.7 billion dollars in formulated pesticide products to its global trading partners in 2017.¹¹ But just 5% of China's exports of such formulated products were destined for the United States.¹² And while the United States is doubtless a significant market for China's exports of technical chemicals for crop and specialty pesticide applications, the United States is less important in the context of China's global exports than Chinese imports are in the context of the U.S. pesticide supply chain. In 2017, under the five six-digit tariff provisions corresponding to the provisions most commonly cited by CLA and RISE members as those used to import technical chemicals from China, and subject to the Administration's proposal, China exported more than \$4.1 billion dollars in merchandise.¹³ Less than one-fifth of these exports were destined for the United States.¹⁴ Meanwhile, U.N. Comtrade data regarding U.S. imports under these same provisions shows that Chinese imports accounted for a much greater share of U.S. import trade – 38% in 2017.

These data indicate that the burden of the proposed tariffs will not primarily fall on the Chinese Government, or on Chinese companies. Rather, that burden will be unequal, and will mostly be shouldered by U.S. importers, manufacturers, and distributors, including CLA and

¹¹ See **Appendix D** (UN Comtrade Data). The Harmonized Tariff System, which has been adopted by the United States and many other countries is, as the name suggests, an international, harmonized system for customs classification, created by the World Customs Organization ("WCO"). This system divides goods into chapters based on industry/materials, and further divides each chapter into four-digit "headings" that describe certain merchandise, and each heading into further six-digit "subheadings." Pursuant to the HTS, formulated crop protection products are classified in Chapter 38, and more particularly in Heading 3808, while organic technical chemicals are spread throughout the headings and subheadings of Chapter 29, depending on their molecular structure.

The customs classifications adopted by those countries that use the harmonized system are identical to the six-digit, subheading level. UN Comtrade data reports exports and imports at the harmonized, six-digit level. The HTSUS reflects this six-digit harmonization, but further subdivides each six-digit provision into eight-digit and ten-digit codes.

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

RISE members, and by the general public in the United States, including U.S. farmers and Americans who want safe, healthy foods and living spaces.

IV. THE PROPOSED TARIFFS WILL NOT BE EFFECTIVE IN ADDRESSING UNFAIR CHINESE TRADE PRACTICES

In the final report issued by the United States Trade Representative (“USTR”) in its Section 301 investigation into unfair Chinese trade practices and policies, the agency focused on the deleterious effect of acts, policies, and practices of the Government of China related to technology transfer, intellectual property, and innovation.¹⁵ The report focused particularly on Chinese policies that force foreign companies, including U.S. companies, to transfer their technology to China, the theft of U.S. intellectual property, and the “Made in China 2025” policy.

CLA and RISE members understand the threat posed by China, particularly with respect to the theft of intellectual property in products such as genetically-engineered seeds designed to withstand pests, stand up to adverse weather conditions, and increase yields. But the Administration’s proposed tariffs are not likely to be effective in addressing such practices, as they focus on China’s production of chemical goods that have largely not been the subject of intellectual property theft or forced technology transfer. In fact, a substantial portion of the Chinese active ingredients that form part of the U.S. crop protection and specialty pesticide supply chain, and which stand to be affected by the Administration’s proposal, are generic, such that issues of intellectual property theft and forced technology transfer do not arise. In other cases, enforceable agreements exist between the owner of the intellectual property and the

¹⁵ Office of the United States Trade Representative, “Findings of the Investigation into China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation under Section 301 of the Trade Act of 1974 (Mar. 22, 2018).

Chinese manufacturers, ensuring that intellectual property and technology is adequately protected.

As for Chinese industrial policies that concern or involve agricultural production and output, such as “Made in China 2025,” these policies tend to focus on machinery and biotechnology (such as genetic engineering of seeds),¹⁶ rather than further developing China’s already-significant ability to produce pesticides. For example, the agricultural aspects of the “Made in China 2025” policy focus primarily on increasing China’s production and use of agricultural machinery.¹⁷ While China also is making efforts to increase its own crop yields, including through more efficient use of crop protection products,¹⁸ CLA and RISE do not believe that the imposition of the proposed tariffs on Chinese-produced pesticides will meaningfully affect China’s efforts in these matters. Indeed, imposition of such tariffs may have the paradoxical effect of increasing supply and lowering prices for pesticides within China, promoting their adoption and use.

Further, while CLA and RISE members share the Administration’s frustration with Chinese policies and practices that limit American manufacturers’ ability to export and market pesticides in China, the effects of retaliatory tariffs by the Government of China must be considered in evaluating the likelihood that the Administration’s proposal will prove effective in altering the Chinese Government’s behavior. CLA and RISE understand that, in response to the Administration’s announcement that it would seek to impose 25% additional duties on the products listed in USTR’s July 17, 2018 *Federal Register* notice, the Chinese Government has

¹⁶ *Id.* at 125-129.

¹⁷ *See, e.g.*, U.S. Chamber of Commerce, “Made in China: Global Ambitions Built on Local Protections” (2017) at 10, 20, 77-78, *available at* https://www.uschamber.com/sites/default/files/final_made_in_china_2025_report_full.pdf.

¹⁸ *Id.* at 77-78.

counter-proposed tariffs on American-sourced and manufactured products, including pesticides, fruits and vegetables. Rather than opening China's market, this will directly and immediately reduce the competitiveness of American products in China.

V. CONCLUSION

CLA and RISE appreciate the Administration's willingness to undertake tough measures to discourage the continuation of China's acts, policies, and practices that disadvantage American companies and American products. However, CLA and RISE believe that the proposed tariffs are unlikely to substantially advance this laudable goal, while they will have immediate, negative effects for pesticide production and distribution in the United States, with knock-on effects for all pesticide users. These negative effects include potential job losses and hours reduction in U.S. pesticide formulation operations, increased costs for pesticide products, reduced yields and profitability for American farmers, reduced ability for applicators and consumers to cost-effectively control pests, and even increased costs and reduced selection for American and global consumers of American-grown fruits and vegetables. The burden of the tariffs will fall disproportionately on American shoulders.

Respectfully submitted,



Aaron Hobbs
President – RISE



Christopher Novak
President – CropLife America

Appendix A -- Covered Tariff Provisions Identified by CLA/RISE and Their Members

Tariff Code	Descriptor
2853905000	Phosphides, whether or not chemically defined, excluding ferrophosphorus, of other metals or of nonmetals
2853909090	Other phosphides, excl ferrophosphorous, nesoi, other than doped gallium arsenide wafers
2903290000	Unsaturated chlorinated derivatives of acyclic hydrocarbons, nesoi
2903810000	1,2,3,4,5,6-Hexachlorocyclohexane (HCH (ISO)), including Lindane(ISO, INN)
2903820000	Aldrin (ISO), chlordane (ISO) and heptachlor (ISO)
2903830000	Halogenated derivatives of cyclanic cyclenic or cycloterpenic hydrocarbons: Mirex (ISO)
2903891100	Halogenated pesticides derived in whole or in part from benzene or other aromatic hydrocarbon, nesoi
2903920000	Hexachlorobenzene (ISO) and DDT (clofenatone (INN), (1,1,1-Trichloro-2,2-bis(p-chlorophenyl)ethane))
2903991000	m-Dichlorobenzene; 1,1-dichloro-2,2-bis(p-ethylphenyl)ethane; and trichlorobenzenes
2903993000	Pesticides derived from halogenated derivatives of aromatic hydrocarbons
2903998001	Other halogenated derivatives of aromatic hydrocarbons, nesoi
2904910000	Trichloronitromethane (chloropicrin)
2905160050	Octanol (Octyl alcohol) and isomers thereof, other than 2-Ethylhexan-1-ol
2907120000	Cresols and their salts
2908110000	Pentachlorophenol (ISO)
2908192000	Pentachlorophenol and its salts; and 2,4,5-trichlorophenol and its salts
2908910000	Dinoseb (ISO) and its salts
2908992500	Nitrophenols, except p-nitrophenol
2909303000	Pesticides, of aromatic ethers and their halogenated, sulfonated, nitrated or nitrosated derivatives
2910902000	Aromatic epoxides, epoxyalcohols, epoxyphenols and epoxyethers, with a three-membered ring, and their derivatives, nesoi
2914190000	Acyclic ketones without other oxygen function, nesoi
2914295000	Cyclanic, cyclenic or cycloterpenic ketones without other oxygen function, nesoi
2914399000	Aromatic ketones without other oxygen function, nesoi
2914710000	Halogenated, sulfonated, nitrated or nitrosated derivatives: chlordecone (ISO)
2914794000	Other halogenated, sulfonated, nitrated, etc derivatives of aromatic ketones and quinones whether or not with other oxygen function
2915110000	Formic acid
2915394700	Acetates of polyhydric alcohols or of polyhydric alcohol ethers
2915405050	Nonaromatic salts and esters of chloroacetic acids, nesoi, other than sodium chloroacetate
2916201000	Tefluthrin
2916205000	Cyclanic, cyclenic or cycloterpenic monocarboxylic acids, their anhydrides, halides, peroxides, peroxyacids and their derivatives
2916397900	Other aromatic monocarboxylic acids, their anhydrides, halides, peroxides, peroxyacids and their derivatives
2917197050	Acyclic polycarboxylic acids and derivative (excluding plasticizers)
2917200000	Cyclanic, cyclenic or cycloterpenic polycarboxylic acids, their anhydrides, halides, peroxides, peroxyacids and their derivatives
2918120000	Tartaric acid
2918910000	2, 4, 5-T (ISO) (2, 4, 5-trichlorophenoxyacetic acid), its salts and esters
2918991800	4-(4-Chloro-2-methyl-phenoxy)butyric acid; p-chlorophenoxyacetic acid; and 2-(2,4-dichlorophenoxy)propionic acid
2918992010	Aromatic pesticides, derived from carboxylic acids with additional oxygen function, and their derivatives, nesoi, 2,4-Dichlorophenoxyacetic acid, its salts and esters
2918992015	Aromatic pesticides, derived from carboxylic acids with additional oxygen function, and their derivatives, nesoi, 2-Methyl-4-chlorophenoxyacetic acid

2918992050	Aromatic pesticides, derived from carboxylic acids with additional oxygen function, and their derivatives, nesoi, other than 2,4-Dichlorophenoxyacetic acid, its salts and esters or 2-Methyl-4-chlorophenoxyacetic acid
2918994300	Aromatic carboxylic acids with add'l oxygen function and their anhydrides, halide, etc deriv described in add US note 3 to sect VI, nesoi
2918995000	Nonaromatic carboxylic acids with additional oxygen function, and their derivatives, nesoi
2919905050	Nonaromatic phosphoric esters and their salts, including lactophosphates, and their derivatives, other (excluding plasticizers)
2920110000	Parathion (ISO) and parathion-methyl (ISO) (methyl-parathion)
2920194000	Other aromatic thiophosphoric esters (phosphorothioates) and their salts; their halogenated, sulfonated, nitrated or nitrosated derivatives
2920195000	Nonaromatic phosphorothioates, their salts and halogenated, sulfonated, nitrated or nitrosated derivatives, nesoi
2920901000	Aromatic pesticides of esters of other inorganic acids (excluding hydrogen halides), their salts and their derivatives
2920902000	Aromatic esters of other inorganic acids (excluding hydrogen halides) their salts and their derivatives, nesoi
2920905100	Nonaromatic esters of inorganic acids of nonmetals and their salts and derivatives, excluding esters of hydrogen halides, nesoi
2921421000	N,N-Dimethylaniline
2921421800	o-Aminobenzenesulfonic acid; 6-chlorometanilic acid; 2-chloro-5-nitroaniline; 4-chloro-3-nitroaniline; dichloroanilines; and other specified
2921426500	Aniline derivatives and their salts of products in additional U.S. note 3 to section VI
2921429000	Other aniline derivatives and their salts
2921431500	alpha,alpha,alpha-Trifluoro-2,6-dinitro-N,N-dipropyl-p-toluidine (Trifluralin)
2921594000	Aromatic polyamines and their derivatives and salts thereof, described in additional U.S. note 3 to section VI
2921598090	Aromatic polyamines and their derivatives; salts thereof nesoi, other than 3,3'-Dichlorobenzidine dihydrochloride
2922494950	Nonaromatic amino-acids, other than those containing more than one kind of oxygen function, other than glycine, alanine, or l -aspartic acid
2924198000	Acyclic amide derivatives; salts thereof; nesoi
2924210800	1,1-Diethyl-3-(alpha,alpha,alph-trifluoro-m-tolyl)urea (Fluometuron)
2924211600	Aromatic ureines and their derivatives pesticides, nesoi
2924292800	N-[[[(4-Chlorophenyl)amino]carbonyl]difluorobenzamide; and 3,5-dichloro-N-(1,1-dimethyl-2-propynyl)benzamide (pronamide)
2924294300	3-Ethoxycarbonylamino-phenyl-N-phenylcarbamate (desmedipham); and Isopropyl-N-(3-chlorophenyl)carbamate (CIPC)
2924294700	Other cyclic amides used as pesticides
2924297100	Aromatic cyclic amides and their derivatives of products described in additional U.S. note 3 to section VI, nesoi
2924299500	Other nonaromatic cyclic amides and their derivatives; salts thereof; nesoi
2925210000	Chlordimeform (ISO)
2926901600	Specifically named derivative of dimethylcyclopropanecarboxylic acid
2926901900	N,N-Bis(2-cyanoethyl)aniline; and 2,6-diflourobenzonitrile
2926902100	Aromatic fungicides of nitrile-function compounds
2926902300	3,5-Dibromo-4-hydroxybenzonitrile (Bromoxynil)
2926902500	Aromatic herbicides of nitrile-function compounds, nesoi
2926903000	Other aromatic nitrile-function pesticides
2926904801	Aromatic nitrile-function compounds other than those products in additional U.S. note 3 to section VI, nesoi

2926905050	Nonaromatic nitrile-function compounds, nesoi, other than malononitrile
2928002500	Aromatic organic derivatives of hydrazine or of hydroxylamine
2928005000	Nonaromatic organic derivatives of hydrazine or of hydroxylamine, nesoi
2929901500	Other aromatic compounds with other nitrogen function of products described in additional U.S. note 3 to section VI
2929905090	Nonaromatic compounds with other nitrogen functions, except isocyanates, N,N-Dialkyl (methyl, ethyl, n-propyl or isopropyl)phosphoramidic dihalides, or Dialkyl (methyl, ethyl, n-propyl or isopropyl)-N,N-dialkyl (methyl, ethyl, n-propyl or isopropyl)phosphoramidates
2930201000	Aromatic pesticides of thiocarbamates and dithiocarbamates
2930207000	S-(2,3,3-trichloroallyl)diisopropylthiocarbamate
2930209010	Other non-aromatic thiocarbamates and dithiocarbamates, pesticides
2930901000	Aromatic pesticides of organo-sulfur compounds, nesoi
2930902900	Other aromatic organo-sulfur compounds (excluding pesticides)
2930903000	Thiocyanates, thiurams and isothiocyanates
2930904200	O,O-Dimethyl-S-methylcarbamoylmethyl phosphorodithioate; and malathion
2930904320	Other non-aromatic organo-sulfur compounds used as pesticides, Compounds containing a phosphorus atom to which is bonded one methyl, ethyl, n-propyl or isopropyl group, but no other carbon atoms
2930904391	Other non-aromatic organo-sulfur compounds used as pesticides, not compounds containing a phosphorus atom to which is bonded one methyl, ethyl, n-propyl or isopropyl group, but no other carbon atoms and not O-Ethyl-S-phenylethylphosphonothiolothionate (fonofos)
2931200000	Tributyltin compounds
2931390012	Other organo-phosphorous derivatives, nesoi, ontaining a phosphorus atom to which is bonded one methyl, ethyl, n-propyl or isopropyl group, but no other carbon atoms
2931390015	Other organo-phosphorous derivatives, nesoi, 2-Amino-4-[hydroxy(methyl)phosphonyl] butanoic acid (glufosinate) and its salts and esters
2931390018	Other organo-phosphorous derivatives, nesoi, not 2-Amino-4-[hydroxy(methyl)phosphonyl] butanoic acid (glufosinate) and its salts and esters, and not containing a phosphorus atom to which is bonded one methyl, ethyl, n-propyl or isopropyl group, but no other carbon atoms
2931902600	Pesticides of aromatic organo-inorganic (except organo-sulfur) compounds
2931903000	Aromatic organo-inorganic compounds, nesoi, described in additional U.S. note 3 to section VI
2931909029	Other non-aromatic organo-inorganic compounds, organo-tin compounds other than dibutyltin oxide or tetrabutyltin
2931909045	Other non-aromatic organo-inorganic compounds, 2-Amino-4-[hydroxy(methyl)phosphonyl] butanoic acid (glufosinate) and its salts
2931909048	Other non-aromatic organo-inorganic compounds; other organo-phosphorus compounds
2931909051	Other non-aromatic organo-inorganic compounds, other than organo-silicon or organo-tin compounds
2932110000	Tetrahydrofuran
2932990400	2,2-Dimethyl-1,3-benzodioxol-4-yl methylcarbamate (Bendiocarb)
2932992000	Aromatic pesticides of heterocyclic compounds with oxygen hetero-atom(s) only, nesoi
2932999090	Nonaromatic heterocyclic compounds with oxygen hetero-atom(s) only, nesoi, other than glucosamine and its salts and esters
2933192300	Aromatic or modified aromatic pesticides containing an unfused pyrazole ring (whether or not hydrogenated) in the structure
2933193700	Aromatic or mod. aromatic compound desc in add US note 3 to section VI contain an unfused pyrazole ring (w/wo hydrogenated) in the structure
2933210000	Hydantoin and its derivatives
2933696021	Other compounds containing an unfused triazine ring (whether or not hydrogenated) in the structure, pesticides other than sodium dichloroisocyanurate and trichloroisocyanuric acid
2933696050	Other compounds containing an unfused triazine ring (whether or not hydrogenated) in the structure, nesoi

2933920000	N-Methyl-2-pyrrolidone; and 2-pyrrolidone
2934101000	Aromatic or modified aromatic heterocyclic compounds cont. an unfused thiazole ring, described in add. U.S. note 3 to section VI
2934102000	Aromatic or modified aromatic heterocyclic compounds, nesoi, containing an unfused thiazole ring
2934109000	Other compounds (excluding aromatic or modified aromatic) containing an unfused thiazole ring (whether or not hydrogenated) in the structure
2934203500	Pesticides containing a benzothiazole ring-system, not further fused
3204170485	Pigments and preparations based thereon, pigment black 1, and other specified pigments, nesoi, not specifically named in other provisions of eight-digit tariff line
3808520000	DDT (ISO) (clofenatone (INN)), in packings of a net weight content not exceeding 300 g
3808591000	Pesticides containing any aromatic or modified aromatic specified in note 1 to chapter 38
3808595000	Pesticides, nesoi specified in note 1 to chapter 38
3808611000	Pesticides containing any aromatic or modified aromatic, not exceeding 300g, specified in note 2 to chapter 38
3808615000	Pesticides, nesoi, not exceeding 300g, specified in note 2 to chapter 38
3808625000	Pesticides, nesoi, >300g but <7.5kg, specified in note 2 to chapter 38
3808691000	Pesticides containing any aromatic or modified aromatic, >7.5kg, specified in note 2 to chapter 38
3808695000	Pesticides, nesoi, >7.5kg, specified in note 2 to chapter 38
3808911000	Fly ribbons (ribbon fly catchers), put up in packings for retail sale
3808911500	Mixtures of N-[[chlorophenyl]amino]carbonyl]-2,6-difluorobenzamide and inert substances
3808912501	Insecticides containing any aromatic or modified aromatic insecticide, nesoi, other than Mixtures of N-[[4-chlorophenyl]amino]-carbonyl]-2,6-difluorobenzamide and inert substances
3808913000	Insecticides, nesoi, containing an inorganic substance, put up for retail sale
3808915001	Insecticides, nesoi, for retail sale or as preparations or articles, neither containing an aromatic or modified aromatic insecticide or any inorganic substance
3808920500	Mixtures of dinocap and application adjuvants
3808921500	Fungicides containing any aromatic or modified aromatic fungicide, nesoi
3808922400	Maneb; zinab; mancozeb; and metiram
3808922800	Fungicides containing any fungicide which is a thioamide, thiocarbamate, dithio carbamate, thiuram or isothiocyanate, nesoi
3808923000	Fungicides, nesoi, containing an inorganic substance, put up for retail sale
3808925000	Fungicides nesoi, put up in forms or packing for retail sale or as preparations or articles
3808930500	Herbicides, antisprouting products and plant-growth regulators, aromatic or modified aromatic, for retail sale
3808931500	Herbicides containing any aromatic or modified aromatic herbicide, antisprouting agent or plant-growth regulator, nesoi
3808932000	Herbicides, antisprouting products and plant-growth regulators, nesoi, containing an inorganic
3808935000	Herbicides, antisprouting products and plant-growth regulators, nesoi, other
3808935010	Herbicides, antisprouting products and plant-growth regulators nesoi, put up for retail sale, Mixtures of 2-amino-4-[hydroxy(methyl)phosphonyl] butanoic acid (glufosinate) or its salts or esters and application adjuvants
3808935050	Herbicides, antisprouting products and plant-growth regulators nesoi, put up for retail sale, other than Mixtures of 2-amino-4-[hydroxy(methyl)phosphonyl] butanoic acid (glufosinate) or its salts or esters and application adjuvants
3808990400	Mixtures of 1,1-bis(4-chlorophenyl)-2,2,2-trichloroethanol (Dicofol) and application adjuvants
3808990800	Rodenticides containing any aromatic or modified aromatic pesticide, nesoi
3808993000	Formulated biocides based on 2-methyl-4-isothiazolin-3-one, or 2-n-octyl-4-isothiazolin-3-one, or on certain other chemicals; metaldehyde
3808997000	Rodenticides containing an inorganic substance
3808999501	Rodenticides, nesoi, not containing an inorganic substance

3824999295	Chemical products and preparations and residual products of the chemical or allied industries, nesoi
3824999297	Chemical products and preparations and residual products of the chemical or allied industries, nesoi, other than those named in prior provisions within the eight-digit tariff line
3913902015	Polysaccharides and their derivatives, nesoi, in primary forms, xanthan gum

Appendix B -- Covered Codes of Under Which Imports Entered from China in 2017

HTS Number	<i>World</i>		<i>China</i>		<i>China as % of World</i>	
	2017	2018 YTD	2017	2018 YTD	2017	2018 YTD
2853905000	\$7,562,849	\$4,577,251	\$1,179,617	\$1,058,236	15.6%	23.1%
2853909090	\$132,910,960	\$203,388,362	\$3,026,051	\$1,243,039	2.3%	0.6%
2903290000	\$25,166,063	\$15,111,606	\$1,811,693	\$1,329,989	7.2%	8.8%
2903891100	\$53,200	\$15,039,419	\$53,200	\$15,039,419	100.0%	100.0%
2903991000	\$15,081,511	\$7,035,437	\$4,210,759	\$1,997,296	27.9%	28.4%
2903998001	\$40,869,714	\$20,102,865	\$31,309,607	\$15,672,290	76.6%	78.0%
2904910000	\$50,004	\$556,861	\$23,364	\$525,661	46.7%	94.4%
2905160050	\$14,141,528	\$4,934,943	\$1,255,194	\$668,123	8.9%	13.5%
2907120000	\$6,989,494	\$2,222,604	\$115,387	\$26,528	1.7%	1.2%
2908110000	\$8,936,636	\$4,207,028	\$4,000	\$0	0.0%	0.0%
2908192000	\$67,845	\$76,326	\$4,903	\$3,240	7.2%	4.2%
2908992500	\$3,376,106	\$1,470,209	\$3,108,314	\$1,454,209	92.1%	98.9%
2909303000	\$25,100,509	\$12,621,925	\$19,008,060	\$8,062,956	75.7%	63.9%
2910902000	\$7,112,744	\$8,432,892	\$2,349,362	\$5,279,374	33.0%	62.6%
2914190000	\$40,085,309	\$23,878,006	\$11,230,530	\$6,492,692	28.0%	27.2%
2914295000	\$58,825,024	\$32,525,175	\$10,508,766	\$11,370,356	17.9%	35.0%
2914399000	\$31,588,053	\$18,181,807	\$21,153,100	\$13,266,285	67.0%	73.0%
2914710000	\$109,608	\$17,960	\$56,555	\$17,960	51.6%	100.0%
2914794000	\$25,952,008	\$1,798,706	\$22,141,981	\$1,359,659	85.3%	75.6%
2915110000	\$3,708,814	\$3,752,475	\$908,933	\$377,284	24.5%	10.1%
2915394700	\$2,571,930	\$1,262,277	\$762,544	\$438,848	29.6%	34.8%
2915405050	\$7,357,798	\$4,597,742	\$4,704,679	\$2,626,606	63.9%	57.1%
2916205000	\$167,811,337	\$62,246,408	\$93,523,046	\$32,819,714	55.7%	52.7%
2916397900	\$22,434,491	\$10,440,693	\$19,746,447	\$7,845,565	88.0%	75.1%
2917197050	\$78,596,458	\$47,811,966	\$64,505,950	\$42,009,598	82.1%	87.9%
2917200000	\$28,941,574	\$19,499,627	\$8,259,551	\$5,641,889	28.5%	28.9%
2918120000	\$36,933,461	\$34,130,391	\$8,286,767	\$4,892,141	22.4%	14.3%
2918910000	\$4,946	\$7,848	\$2,844	\$0	57.5%	0.0%

2918992010	\$84,639,909	\$43,524,397	\$59,568,470	\$32,393,410	70.4%	74.4%
2918992015	\$19,748,952	\$6,835,006	\$689,627	\$0	3.5%	0.0%
2918992050	\$267,843,490	\$159,313,684	\$156,601,724	\$89,506,956	58.5%	56.2%
2918994300	\$15,720,287	\$10,751,977	\$8,472,975	\$7,193,686	53.9%	66.9%
2918995000	\$117,956,736	\$88,920,484	\$90,807,719	\$74,232,473	77.0%	83.5%
2919905050	\$83,115,002	\$44,398,641	\$58,110,238	\$30,678,003	69.9%	69.1%
2920194000	\$2,643,382	\$1,069,114	\$96,640	\$0	3.7%	0.0%
2920195000	\$14,720,584	\$10,570,376	\$7,657,156	\$8,475,869	52.0%	80.2%
2920901000	\$3,700,277	\$4,061,403	\$315,360	\$2,479,930	8.5%	61.1%
2920902000	\$26,208,836	\$14,422,369	\$6,845,810	\$3,481,655	26.1%	24.1%
2920905100	\$98,174,519	\$72,940,486	\$29,963,461	\$20,702,915	30.5%	28.4%
2921421000	\$6,005,443	\$1,313,744	\$4,537,250	\$959,592	75.6%	73.0%
2921421800	\$2,610,078	\$843,052	\$1,887,432	\$728,645	72.3%	86.4%
2921426500	\$4,264,439	\$3,019,823	\$3,801,472	\$1,932,173	89.1%	64.0%
2921429000	\$47,558,182	\$16,458,581	\$6,721,023	\$3,280,039	14.1%	19.9%
2921431500	\$19,881,981	\$9,696,224	\$3,317,120	\$3,182,159	16.7%	32.8%
2921594000	\$7,212,428	\$5,358,503	\$960,353	\$2,160,134	13.3%	40.3%
2921598090	\$32,709,172	\$16,874,200	\$8,963,211	\$3,404,176	27.4%	20.2%
2922494950	\$276,718,275	\$477,520,210	\$42,938,929	\$52,333,010	15.5%	11.0%
2924198000	\$84,480,419	\$44,556,512	\$26,629,753	\$17,670,005	31.5%	39.7%
2924210800	\$3,196,887	\$934,230	\$1,144,000	\$0	35.8%	0.0%
2924211600	\$21,600,873	\$10,777,388	\$2,897,338	\$2,855,963	13.4%	26.5%
2924292800	\$470,840	\$1,600,470	\$279,000	\$45,000	59.3%	2.8%
2924294700	\$143,618,328	\$87,873,790	\$57,865,785	\$23,307,510	40.3%	26.5%
2924297100	\$36,575,407	\$15,047,842	\$17,847,387	\$10,498,945	48.8%	69.8%
2924299500	\$32,485,157	\$19,211,242	\$14,791,171	\$11,693,197	45.5%	60.9%
2926901600	\$44,126,271	\$20,428,730	\$14,966,035	\$11,190,643	33.9%	54.8%
2926901900	\$3,989,954	\$2,177,488	\$3,989,954	\$2,177,488	100.0%	100.0%
2926902100	\$38,483,882	\$33,626,717	\$33,469,504	\$32,248,399	87.0%	95.9%
2926902300	\$10,163,396	\$4,709,622	\$9,184,696	\$4,025,436	90.4%	85.5%
2926902500	\$15,566,546	\$8,279,862	\$7,444,363	\$7,794,361	47.8%	94.1%
2926903000	\$51,618,149	\$38,228,261	\$10,401,870	\$12,405,433	20.2%	32.5%

2926904801	\$33,217,995	\$18,893,947	\$16,651,171	\$8,293,751	50.1%	43.9%
2926905050	\$50,545,336	\$35,439,902	\$18,395,804	\$15,722,302	36.4%	44.4%
2928002500	\$127,241,335	\$85,044,453	\$10,080,454	\$5,680,591	7.9%	6.7%
2928005000	\$19,877,213	\$10,238,426	\$9,415,755	\$6,583,192	47.4%	64.3%
2929901500	\$36,738,428	\$26,625,526	\$17,452,774	\$11,079,964	47.5%	41.6%
2929905090	\$28,734,775	\$18,421,660	\$16,594,151	\$10,839,862	57.7%	58.8%
2930207000	\$1,928,360	\$0	\$1,928,360	\$0	100.0%	
2930209010	\$3,082,148	\$3,570,714	\$647,107	\$409,593	21.0%	11.5%
2930901000	\$205,206,896	\$65,201,866	\$58,721,889	\$48,993,044	28.6%	75.1%
2930902900	\$77,437,849	\$40,077,836	\$15,287,661	\$9,780,944	19.7%	24.4%
2930903000	\$3,366,728	\$2,073,795	\$186,592	\$499,445	5.5%	24.1%
2930904200	\$23,440,305	\$10,943,110	\$2,272,751	\$1,906,356	9.7%	17.4%
2930904391	\$55,717,269	\$22,888,349	\$24,744,400	\$8,796,219	44.4%	38.4%
2931200000	\$5,852,354	\$3,439,060	\$94,235	\$93,488	1.6%	2.7%
2931390000	\$28,105,494	\$0	\$24,916,843	\$0	88.7%	
2931390015	\$7,509,956	\$45,183,590	\$7,352,046	\$27,185,287	97.9%	60.2%
2931390018	\$78,074,170	\$161,525,136	\$69,905,026	\$148,782,029	89.5%	92.1%
2931902600	\$3,284,680	\$7,874,995	\$2,344,540	\$7,471,615	71.4%	94.9%
2931903000	\$29,846,972	\$19,373,705	\$18,650,025	\$14,281,847	62.5%	73.7%
2931909029	\$20,355,055	\$12,284,802	\$8,843,772	\$5,929,146	43.4%	48.3%
2931909045	\$35,086,635	\$0	\$13,279,589	\$0	37.8%	
2931909048	\$207,457,620	\$0	\$157,161,998	\$0	75.8%	
2931909051	\$196,906,417	\$280,300,938	\$123,027,410	\$217,575,770	62.5%	77.6%
2932110000	\$8,379,792	\$5,349,092	\$913,065	\$927,883	10.9%	17.3%
2932990400	\$3,400	\$3,550	\$3,400	\$3,550	100.0%	100.0%
2932992000	\$5,369,278	\$3,952,530	\$1,082,114	\$1,097,002	20.2%	27.8%
2932999090	\$181,375,520	\$306,406,202	\$48,042,696	\$52,063,366	26.5%	17.0%
2933192300	\$167,178,678	\$86,949,187	\$16,354,646	\$17,042,073	9.8%	19.6%
2933193700	\$101,134,776	\$43,671,436	\$5,197,356	\$5,064,372	5.1%	11.6%
2933210000	\$44,045,645	\$20,142,379	\$27,761,908	\$13,185,904	63.0%	65.5%
2933696021	\$89,238,492	\$47,648,574	\$64,958,975	\$29,888,936	72.8%	62.7%
2933696050	\$110,244,791	\$77,699,842	\$61,903,418	\$51,328,717	56.2%	66.1%

2933920000	\$542,876	\$80,000	\$10,876	\$80,000	2.0%	100.0%
2934101000	\$870,619,910	\$639,520,875	\$1,441,238	\$1,781,679	0.2%	0.3%
2934102000	\$22,590,227	\$6,303,780	\$1,066,018	\$1,481,894	4.7%	23.5%
2934109000	\$76,218,236	\$72,909,292	\$1,883,568	\$778,248	2.5%	1.1%
3204170485	\$50,725,819	\$25,349,369	\$14,989,011	\$8,960,766	29.5%	35.3%
3808591000	\$1,451,320	\$1,044,041	\$1,156,552	\$976,479	79.7%	93.5%
3808595000	\$6,809,257	\$4,028,479	\$6,207,075	\$3,773,457	91.2%	93.7%
3808615000	\$2,587	\$0	\$2,587	\$0	100.0%	
3808695000	\$1,577,395	\$0	\$14,415	\$0	0.9%	
3808911000	\$6,650,575	\$4,373,658	\$1,552,111	\$1,589,009	23.3%	36.3%
3808911500	\$4,200,877	\$1,557,815	\$842,200	\$363,000	20.0%	23.3%
3808912501	\$130,806,449	\$60,887,621	\$12,289,113	\$10,978,745	9.4%	18.0%
3808913000	\$31,264,847	\$12,941,995	\$1,810,127	\$2,038,189	5.8%	15.7%
3808915001	\$416,826,489	\$170,094,322	\$118,519,443	\$64,149,223	28.4%	37.7%
3808921500	\$330,217,201	\$137,602,658	\$5,310,645	\$3,506,142	1.6%	2.5%
3808923000	\$63,152,460	\$34,860,374	\$1,223,310	\$397,789	1.9%	1.1%
3808925000	\$165,805,588	\$47,819,898	\$4,606,403	\$3,553,888	2.8%	7.4%
3808930500	\$17,225,257	\$7,324,140	\$2,021,238	\$1,577,296	11.7%	21.5%
3808931500	\$424,381,290	\$265,297,717	\$72,134,455	\$71,189,721	17.0%	26.8%
3808932000	\$18,188,924	\$11,878,383	\$8,575,286	\$4,006,035	47.1%	33.7%
3808935010	\$61,381,877	\$44,810,006	\$605,178	\$985,576	1.0%	2.2%
3808935050	\$110,921,030	\$79,445,056	\$61,211,605	\$55,724,851	55.2%	70.1%
3808990800	\$6,042,121	\$3,580,638	\$3,210,526	\$1,935,859	53.1%	54.1%
3808993000	\$41,816,516	\$26,051,302	\$13,232,155	\$5,992,690	31.6%	23.0%
3808997000	\$12,828,071	\$9,154,847	\$614,904	\$321,349	4.8%	3.5%
3808999501	\$20,709,968	\$10,950,013	\$7,268,392	\$2,454,677	35.1%	22.4%
3824999295	\$987,882,725	\$0	\$108,943,293	\$0	11.0%	
3913902015	\$97,342,725	\$63,635,912	\$42,241,616	\$24,149,421	43.4%	37.9%
	<i>Column Sum</i>	<i>Column Sum</i>	<i>Column Sum</i>	<i>Column Sum</i>	<i>Column Average</i>	<i>Column Average</i>
	\$8,433,540,023	\$5,608,715,895	\$2,363,573,301	\$1,718,772,042	28.0%	30.6%

Appendix C - Crop Identification for Selected Active Ingredients

Active Ingredient	Crop	Eight-Digit Classification
2,4-D	Apple	2918.99.20
Abamectin	Apple	3808.91.50
Bifenthrin	Apple	2916.20.50
Ethephon	Apple	2931.90.90
Fludioxonil	Apple	2934.99.12
Fluroxypyr	Apple	2933.39.25
Glufosinate-ammonium	Apple	2931.39.00
Glyphosate	Apple	2931.90.90
Imidacloprid	Apple	2933.39.27
Lambda Cyhalothrin	Apple	2926.90.30
Metalaxyl	Apple	2924.29.47
Metalaxyl-M (Mefenoxam)	Apple	2924.29.47
Oxyfluorfen	Apple	2909.30.30
Simazine	Apple	2933.69.60
Tebuconazole	Apple	2933.99.22
Thiophanate-methyl	Apple	2930.90.10
2,4-D	Barley	2918.99.20
Azoxystrobin	Barley	2933.59.15
Bromoxynil	Barley	2926.90.25
Dicamba	Barley	2918.99.20
Ethephon	Barley	2931.90.90
Fludioxonil	Barley	2934.99.12

Fluroxypyr	Barley	2933.39.25
Glyphosate	Barley	2931.90.90
Imidacloprid	Barley	2933.39.27
Lambda Cyhalothrin	Barley	2926.90.30
MCPA	Barley	2918.99.20
Metalaxyl	Barley	2924.29.47
Metalaxyl-M (Mefenoxam)	Barley	2924.29.47
Metribuzin	Barley	2933.69.60
Tebuconazole	Barley	2933.99.22
Tetraconazole	Barley	2933.99.22
Trifluralin	Barley	2921.43.15
Azoxystrobin	Cabbage	2933.59.15
Bifenthrin	Cabbage	2916.20.50
Chlorothalonil	Cabbage	2926.90.21
Clomazone	Cabbage	2934.99.15
Dichlormid	Cabbage	2924.19.80
Fludioxonil	Cabbage	2934.99.12
Glyphosate	Cabbage	2931.90.90
Imidacloprid	Cabbage	2933.39.27
Lambda Cyhalothrin	Cabbage	2926.90.30
Metalaxyl	Cabbage	2924.29.47
Metalaxyl-M (Mefenoxam)	Cabbage	2924.29.47
Oxyfluorfen	Cabbage	2909.30.30
Trifluralin	Cabbage	2921.43.15
2,4-D	Corn	2918.99.20

Atrazine	Corn	2933.69.60
Azoxystrobin	Corn	2933.59.15
Bifenthrin	Corn	2916.20.50
Bromoxynil	Corn	2926.90.25
Dicamba	Corn	2918.99.20
Dichlormid	Corn	2924.19.80
Fipronil	Corn	3808.93.50
Fludioxonil	Corn	2934.99.12
Fluroxypyr	Corn	2933.39.25
Glufosinate-ammonium	Corn	2931.39.00
Glyphosate	Corn	2931.90.90
Imidacloprid	Corn	2933.39.27
Lambda Cyhalothrin	Corn	2926.90.30
Linuron	Corn	2924.21.16
Metalaxyl	Corn	2924.29.47
Metalaxyl	Corn	2924.29.47
Metalaxyl-M (Mefenoxam)	Corn	2924.29.47
Metalaxyl-M (Mefenoxam)	Corn	2924.29.47
Metolachlor	Corn	2924.29.47
Metribuzin	Corn	2933.69.60
Oxyfluorfen	Corn	2909.30.30
Simazine	Corn	2933.69.60
Tebuconazole	Corn	2933.99.22
Tetraconazole	Corn	2933.99.22
Trifluralin	Corn	2921.43.15

2,4-D	Cottonseed	2918.99.20
Abamectin	Cottonseed	3808.91.50
Acephate	Cottonseed	2930.90.43
Azoxystrobin	Cottonseed	2933.59.15
Bifenthrin	Cottonseed	2916.20.50
Bromoxynil	Cottonseed	2926.90.25
Clomazone	Cottonseed	2934.99.15
Dicamba	Cottonseed	2918.99.20
Dichlormid	Cottonseed	2924.19.80
Ethephon	Cottonseed	2931.90.90
Fludioxonil	Cottonseed	2934.99.12
Glufosinate-ammonium	Cottonseed	2931.39.00
Glyphosate	Cottonseed	2931.90.90
Imidacloprid	Cottonseed	2933.39.27
Lambda Cyhalothrin	Cottonseed	2926.90.30
Linuron	Cottonseed	2924.21.16
Metalaxyl	Cottonseed	2924.29.47
Metalaxyl-M (Mefenoxam)	Cottonseed	2924.29.47
Metolachlor	Cottonseed	2924.29.47
Oxyfluorfen	Cottonseed	2909.30.30
Tebuconazole	Cottonseed	2933.99.22
Trifluralin	Cottonseed	2921.43.15
2,4-D	Oranges	2918.99.20
Abamectin	Oranges	3808.91.50
Azoxystrobin	Oranges	2933.59.15

Bifenthrin	Oranges	2916.20.50
Fludioxonil	Oranges	2934.99.12
Glufosinate-ammonium	Oranges	2931.39.00
Glyphosate	Oranges	2931.90.90
Imidacloprid	Oranges	2933.39.27
Metalaxyl	Oranges	2924.29.47
Metalaxyl-M (Mefenoxam)	Oranges	2924.29.47
Simazine	Oranges	2933.69.60
Tebuconazole	Oranges	2933.99.22
Trifluralin	Oranges	2921.43.15
Acephate	Peanut	2930.90.43
Azoxystrobin	Peanut	2933.59.15
Bifenthrin	Peanut	2916.20.50
Chlorothalonil	Peanut	2926.90.21
Dichlormid	Peanut	2924.19.80
Fludioxonil	Peanut	2934.99.12
Glyphosate	Peanut	2931.90.90
Imidacloprid	Peanut	2933.39.27
Lambda Cyhalothrin	Peanut	2926.90.30
Metalaxyl	Peanut	2924.29.47
Metalaxyl-M (Mefenoxam)	Peanut	2924.29.47
Metolachlor	Peanut	2924.29.47
Tebuconazole	Peanut	2933.99.22
Tetraconazole	Peanut	2933.99.22
Thiophanate-methyl	Peanut	2930.90.10

Trifluralin	Peanut	2921.43.15
2,4-D	Potato	2918.99.20
Abamectin	Potato	3808.91.50
Azoxystrobin	Potato	2933.59.15
Bifenthrin	Potato	2916.20.50
Chlorothalonil	Potato	2926.90.21
Cymoxanil	Potato	2926.90.50
Dichlormid	Potato	2924.19.80
Fipronil	Potato	3808.93.50
Fludioxonil	Potato	2934.99.12
Glufosinate-ammonium	Potato	2931.39.00
Glyphosate	Potato	2931.90.90
Imidacloprid	Potato	2933.39.27
Lambda Cyhalothrin	Potato	2926.90.30
Linuron	Potato	2924.21.16
Metalaxyl	Potato	2924.29.47
Metalaxyl-M (Mefenoxam)	Potato	2924.29.47
Metolachlor	Potato	2924.29.47
Metribuzin	Potato	2933.69.60
Thiophanate-methyl	Potato	2930.90.10
Trifluralin	Potato	2921.43.15
2,4-D	Rice	2918.99.20
Azoxystrobin	Rice	2933.59.15
Clomazone	Rice	2934.99.15
Fipronil	Rice	3808.93.50

Fludioxonil	Rice	2934.99.12
Fluroxypyr	Rice	2933.39.25
Glufosinate-ammonium	Rice	2931.39.00
Glyphosate	Rice	2931.90.90
Lambda Cyhalothrin	Rice	2926.90.30
Metalaxyl	Rice	2924.29.47
Metalaxyl	Rice	2924.29.47
Metalaxyl-M (Mefenoxam)	Rice	2924.29.47
Metalaxyl-M (Mefenoxam)	Rice	2924.29.47
2,4-D	Soybean	2918.99.20
Abamectin	Soybean	3808.91.50
Acephate	Soybean	2930.90.43
Azoxystrobin	Soybean	2933.59.15
Bifenthrin	Soybean	2916.20.50
Chlorothalonil	Soybean	2926.90.21
Clomazone	Soybean	2934.99.15
Dicamba	Soybean	2918.99.20
Dichlormid	Soybean	2924.19.80
Fludioxonil	Soybean	2934.99.12
Glufosinate-ammonium	Soybean	2931.39.00
Glyphosate	Soybean	2931.90.90
Imidacloprid	Soybean	2933.39.27
Lambda Cyhalothrin	Soybean	2926.90.30
Linuron	Soybean	2924.21.16
Metalaxyl	Soybean	2924.29.47

Metalaxyl-M (Mefenoxam)	Soybean	2924.29.47
Metolachlor	Soybean	2924.29.47
Metribuzin	Soybean	2933.69.60
Oxyfluorfen	Soybean	2909.30.30
Tebuconazole	Soybean	2933.99.22
Tetraconazole	Soybean	2933.99.22
Thiophanate-methyl	Soybean	2930.90.10
Trifluralin	Soybean	2921.43.15
2,4-D	Wheat	2918.99.20
Atrazine	Wheat	2933.69.60
Azoxystrobin	Wheat	2933.59.15
Bromoxynil	Wheat	2926.90.25
Dicamba	Wheat	2918.99.20
Ethephon	Wheat	2931.90.90
Fludioxonil	Wheat	2934.99.12
Fluroxypyr	Wheat	2933.39.25
Glyphosate	Wheat	2931.90.90
Imidacloprid	Wheat	2933.39.27
Lambda Cyhalothrin	Wheat	2926.90.30
Linuron	Wheat	2924.21.16
MCPA	Wheat	2918.99.20
Metalaxyl	Wheat	2924.29.47
Metalaxyl-M (Mefenoxam)	Wheat	2924.29.47
Metribuzin	Wheat	2933.69.60
Tebuconazole	Wheat	2933.99.22

Tetraconazole	Wheat	2933.99.22
Thiophanate-methyl	Wheat	2930.90.10
Trifluralin	Wheat	2921.43.15

Appendix D -- UN Comtrade Data

Chinese Exports under Heading 3808

Year	Trade Flow	Reporter	Partner	Commodity Code	Trade Value (US\$)	% Exported to USA
2017	Export	China	World	3808	\$4,762,568,309	
2017	Export	China	USA	3808	\$252,741,043	5%

Chinese Exports Under Six-Digit Provisions Corresponding to Most Commonly Used Codes Reported by CLA Members

Year	Trade Flow	Reporter	Partner	Commodity Code	Trade Value (US\$)		
2017	Export	China	World	292421	\$8,552,442		
2017	Export	China	USA	292421	\$1,691,177	20%	
2017	Export	China	World	292429	\$1,204,956,757		
2017	Export	China	USA	292429	\$199,168,033	17%	
2017	Export	China	World	292690	\$596,436,080		
2017	Export	China	USA	292690	\$119,239,459	20%	
2017	Export	China	World	293090	\$1,417,400,205		
2017	Export	China	USA	293090	\$247,045,014	17%	
2017	Export	China	World	293369	\$915,188,813		
2017	Export	China	USA	293369	\$153,952,378	17%	
					Value of Total 2017 Exports from China	Value of 2017 Exports from China to U.S.	U.S. as % of Total Chinese Exports
					\$8,552,442	\$1,691,177	
					\$1,204,956,757	\$199,168,033	
					\$596,436,080	\$119,239,459	
					\$1,417,400,205	\$247,045,014	
					\$915,188,813	\$153,952,378	
					\$4,142,534,297	\$721,096,061	17%

U.S. Imports Under Six-Digit Provisions Corresponding to Most Commonly Used Codes Reported by CLA Members

Year	Trade Flow	Reporter	Partner	Commodity Code	Trade Value (US\$)		
2017	Import	USA	World	292421	\$35,126,285		
2017	Import	USA	China	292421	\$6,583,223	19%	
2017	Import	USA	World	292429	\$533,043,302		
2017	Import	USA	China	292429	\$206,083,107	39%	
2017	Import	USA	World	292690	\$277,031,158		
2017	Import	USA	China	292690	\$119,492,376	43%	
2017	Import	USA	World	293090	\$760,565,629		
2017	Import	USA	China	293090	\$215,145,598	28%	
2017	Import	USA	World	293369	\$280,715,899		
2017	Import	USA	China	293369	\$162,185,123	58%	
					Value of 2017 Imports from China into U.S.	Value of Total 2017 Imports into U.S.	China as % of Total U.S. Imports
					\$6,583,223	\$35,126,285	
					\$206,083,107	\$533,043,302	
					\$119,492,376	\$277,031,158	
					\$215,145,598	\$760,565,629	
					\$162,185,123	\$280,715,899	
					\$709,489,427	\$1,886,482,273	38%