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Petitioners' Business Proprietary Information for  
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PUBLIC VERSION

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

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ANTIDUMPING DUTY PETITION  
VOLUME V  
UKRAINE

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RAW HONEY FROM ARGENTINA, BRAZIL, INDIA, UKRAINE, AND  
THE SOCIALIST REPUBLIC OF VIETNAM

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PETITIONERS:  
AMERICAN HONEY PRODUCERS ASSOCIATION AND  
SIOUX HONEY ASSOCIATION

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**I. RAW HONEY FROM UKRAINE IS BEING SOLD OR OFFERED FOR SALE AT LESS THAN FAIR VALUE**

**A. Introduction**

This Petition volume contains information regarding sales at less than fair value in the United States of raw honey from Ukraine. This volume presents information reasonably available to Petitioners demonstrating that raw honey from Ukraine is being sold in the United States at less than fair value within the meaning of section 731 of the Tariff Act of 1930, as amended (“the Act”). See 19 U.S.C. § 1673. As discussed below, application of the standard antidumping methodology used by the U.S. Department of Commerce (“the Department”) demonstrates that producers and exporters in Ukraine have sold, or offered for sale, raw honey in the United States for less than fair value.

The general and injury information required by section 351.202 of the Department’s regulations, 19 C.F.R. § 351.202, and section 207.11 of the regulations of the U.S. International Trade Commission (“ITC” or “the Commission”), 19 C.F.R. § 207.11, can be found in **Volume I** of this Petition. Based on information reasonably available to Petitioners contained in this volume, the Department should initiate an investigation of sales at less than fair value of raw honey from Ukraine and should impose antidumping duties in an amount that is equal to the amount by which the normal value exceeds the export price or constructed export price.

**B. Producers in Ukraine**

To the best of Petitioners’ knowledge, raw honey is produced in Ukraine and exported to the United States by the following companies during the proposed period of investigation (“POI”):

- Agro East Trade Ltd.

- Askania Pack LLC
- Beehive Standard
- Cargomind (Ukraine) Tov
- Gc Sodruzhestvo LLC
- Honey Bee Trade Sp. Z O. O.
- Lumeli LLC (DBA Med Podillya, LLC)
- Natural Honey LLC
- Ukrainian Bee

Pursuant to 19 C.F.R. § 351.202(b)(7)(i)(A), the full names and addresses of all known producers and exporters of honey in all of the subject countries (including Ukraine) is provided in Volume I. See Petition **Volume I at Exhibit GEN-4**. Although information about the proportion of total exports to the United States accounted for by each listed company is not reasonably available to Petitioners, Petitioners believe based on experience in the marketplace that merchandise produced by the identified companies accounts for most or all U.S. imports of honey from Ukraine during the proposed POI.<sup>1</sup>

**C. Export Price or Constructed Export Price**

Petitioners have reason to believe or suspect that producers in Ukraine are selling raw honey in the United States at less than fair value, with sales of the subject merchandise occurring either before or after importation to the United States.

**1. Sources of U.S. Pricing**

Petitioners calculated U.S. pricing for raw honey from Ukraine based on U.S. import statistics maintained by the United States International Trade Commission (USITC DataWeb).

See Exhibit AD-UA-1.

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<sup>1</sup> Consistent with the Department's practice, Petitioners have treated the four calendar quarters prior to the month in which the petition has been filed, April 1, 2020 through March 31, 2021, as the proposed POI.

## 2. Adjustments to U.S. Pricing

Petitioners believe that exporters sell raw honey both directly to end users in the United States, as well as through distributors/trading companies or affiliated sales agents in the United States. A list of all known importers is provided in Volume I. See Petition **Volume I at Exhibit GEN-6**.

In order to calculate ex-factory pricing for the U.S. sales, pursuant to 19 U.S.C. §§ 1677a(c)(2), (19 C.F.R. §§ 24.23(b)(1)(A) and 24.24(a)), Petitioners have deducted from the U.S. pricing, where applicable, the following charges and expenses:

<b>ADJUSTMENT</b>	<b>SOURCE</b>	<b>EXHIBIT</b>
Foreign inland freight	Doing Business in Ukraine	<b>AD-UA-1, Att. 3</b>
Foreign brokerage and handling	Doing Business in Ukraine	<b>AD-UA-1, Att. 3</b>

These adjustments and Petitioners' calculation of net export pricing are provided at **Exhibit AD-UA-1**.

### **D. Normal Value Based on Home Market Prices**

The preferred method for determining the normal value of imported products is to examine sales or offers for sale of the identical or similar product in the home market of the exporting country. See 19 C.F.R. § 351.403. Petitioners were able to obtain pricing information in Ukraine based on confidential market research. See **Exhibit AD-UA-2**.

### **E. Antidumping Duty Calculations**

Petitioners deducted the export price or constructed export price from normal value – using foreign market pricing as normal value – to determine the dumping margin for the U.S.

sales. This comparison results in dumping margins ranging from **10.56 percent to 94.84 percent, ad valorem**. See **Exhibit AD-UA-3**.

## **II. CONCLUSION AND REQUEST FOR INVESTIGATION**

As demonstrated in this volume, raw honey from Ukraine is being sold in the United States at less than fair value. Accordingly, Petitioners respectfully request that the Department initiate an antidumping investigation of raw honey from Ukraine.

<b>Exhibit No.</b>	<b>Description</b>
AD-UA-1	Export Prices
Att. 1	Summary of export price adjustments and calculation of net U.S. price
Att. 2	U.S. pricing documentation
Att. 3	Movement charges in the home market
Att. 4	Transportation distances
AD-UA-2	Normal Value
Att. 1	Home market pricing
Att. 2	Exchange rates
AD-UA-3	Margins of Dumping