



A-570-051, C-570-052

Administrative Reviews

POR: 1/1/2022 – 12/31-2022

~~Business Proprietary Document~~

E&C/OV: RJ

Contains BPI of Multiple Companies in Attachment I
Public Version

April 11, 2024

To: All Respondents Listed in Attachment I

Re: Administrative Review of the Antidumping and Countervailing Duty Orders on Certain Hardwood Plywood from the People's Republic of China: Producer Certification Eligibility Questionnaire

This letter concerns the administrative review of the antidumping and countervailing duty orders on certain hardwood plywood products (hardwood plywood) from the People's Republic of China (China). The period of review (POR) is September 26, 2021, through December 31, 2022. You are receiving this letter because you responded to Commerce's certification eligibility questionnaire, and we have determined that additional information from your suppliers is necessary for certification eligibility consideration. See Attachment II. Please file your suppliers' response(s) to this questionnaire in accordance with the filing requirements and guidelines (including the guidelines regarding English translations) detailed in the Q&V Questionnaire. To the extent that one of your suppliers is a supplier of more than one respondent in these administrative reviews, such suppliers need only provide one response to this questionnaire. Their response to this questionnaire, along with the appropriate summarization of proprietary data, as required by 19 CFR 351.304(c), is due no later than **5:00 p.m. Eastern Time (ET) on April 22, 2024**.

There are four attachments to this letter. The suppliers identified at Attachment I must respond to the questions in Attachment II. Attachment III contains a glossary of terms and Attachment IV contains the scope of the relevant orders and the description of the hardwood plywood for which we are requesting information (*i.e.*, hardwood plywood regardless of claimed country of origin).

If you are unable to provide a complete response to every question in the attached questionnaire by the established deadline or are unable to provide all requested supporting documentation by the same date, you must notify the official in charge and submit a request for an extension of the deadline for all or part of the questionnaire response. If you require an extension for only part of your response, submit the request separate from the portion of your response filed under the current deadline. Statements included within a questionnaire response regarding a respondent's ongoing efforts to collect part of the requested information, and promises to supply such missing information when available in the future, do not substitute for a written extension request. Section 351.302(c) of Commerce's regulations requires that all extension requests be in writing and state the reasons for the request and any factual statements made in support of such reasons require certifications, pursuant to 19 CFR 351.303(g). An extension request submitted without a



proper certification for any factual information contained therein will be considered improperly filed and, as with any other improperly filed document, will not be accepted. Any extension granted in response to your request will be in writing; otherwise, the original deadline will apply.

If Commerce does not receive either the requested information or a written extension request before 5:00 p.m. ET on the established deadline, we may conclude that your company has decided not to cooperate in this proceeding. Commerce will not accept any requested information submitted after the deadline. As required by section 351.302(d) of our regulations, we will reject such submissions as untimely. Therefore, failure to properly request extensions for all or part of a questionnaire response may result in the application of partial or total facts available, pursuant to section 776(a) of the Act, which may include adverse inferences, pursuant to section 776(b) of the Act and/or a continued finding that your company is not eligible to participate in the certification regime in these proceedings.

For more detailed instructions regarding the submission of filings, please refer to the cover letter and general instructions in the Q&V Questionnaire. We appreciate your attention to these matters. The information which you submit may be subjected to verification. Failure to allow verification of any item may affect the consideration which we will accord to that item or to any other material, whether or not we verify the latter.

Should you have any questions about this matter, please contact Rachel Jennings at rachel.jennings@trade.gov.

Sincerely,



Kabir Archuletta
Program Manager, Office V
Enforcement and Compliance

Attachment

ATTACHMENT I

*Companies that are required to respond to this supplemental questionnaire:
Companies under review, i.e., respondents, are in bold font.*

Arrow Forest International Co., Ltd. (Arrow Forest)'s Suppliers:

[]

[] {BPI of Arrow Forest}

Eagle Industries Company Limited (Eagle)'s Suppliers:

[]

[]

[]

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[]

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[]

[]

[] {BPI of Eagle}

Hai Hien Bamboo Wood Joint Stock Company (Hai Hien)'s Suppliers:

[]

[] {BPI of Hai Hien}

Innovgreen Thanh Hoa Co. Ltd. (Innovgreen)'s Suppliers

[]

[]

[] {BPI of Innovgreen}

Lechenwood Viet Nam Company Limited (Lechenwood)'s Suppliers

[]

[]

[]

[]

[] {BPI of Lechenwood}

Plywood Sunshine Co. (Plywood Sunshine)'s Suppliers

[] {BPI of Plywood Sunshine}

TEKCOM Corporation (TEKCOM)'s Suppliers

[] {BPI of TEKCOM}

VietNam Zhongjia Wood Co., Ltd (Zhongjia)' s Suppliers

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[]

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[]

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[]

[]

[]

[] {BPI of Zhongjia}

]

NOTE: Suppliers that are identified above more than once are only required to submit one response.

ATTACHMENT II

PRODUCER CERTIFICATION ELIGIBILITY QUESTIONNAIRE

Certain Hardwood Plywood Products (Hardwood Plywood) from the People's Republic of China (China)

PERIOD OF REVIEW (POR): September 26, 2021, through December 31, 2022

NOTE : *In accordance with 19 CFR 351.303(e), "A document submitted in a foreign language must be accompanied by an English translation of the entire document or of only pertinent portions, where appropriate, unless the Secretary waives this requirement for an individual document. A party must obtain the Department's approval for submission of an English translation of only portions of a document prior to submission to the Department."*

NOTE: *Please repeat the question prior to giving your response when responding to this supplemental questionnaire.*

NOTE: *If a calculation worksheet is requested, please submit the requested worksheet in pdf format as well as electronic format in Excel.*

NOTE: *If you provide any information in response to this questionnaire that is different or contradictory to information that is already on this record, you must identify each discrepancy and explain the reason for it.*

The remaining questions must be answered by all suppliers identified at Attachment I.

For the purposes of this review, plywood components are core veneer platforms, unfinished plywood, and other intermediate products that can be further processed into finished plywood.

For the purposes of this review, wood inputs are face veneers, back veneers, and core veneers, and other wood inputs (e.g., MDF) used to produce finished plywood or plywood components.

Production

1. Provide a list of all the production facilities, sales office locations, research and development facilities and administrative offices involved in the development, production, sale and/or distribution of the merchandise under review operated by your company and its affiliates. Please briefly describe the purpose of each. Provide a complete address and telephone number for each of these plants, offices, and other facilities.

2. Provide a description of the manufacturing process for the plywood and or plywood components that were supplied to the respondents identified in Attachment I. Your descriptions should address each of the items listed below.
 - a. Describe the Vietnamese production facilities used to manufacture plywood and plywood components. If manufacturing operations take place at more than one facility, identify each facility and describe the production activities that take place at each facility.
 - b. Identify all products manufactured at those production facilities, and provide a detailed description of each product produced.
 - c. Identify all wood inputs, plywood components, and plywood purchased and resold by your company during the POR and provide a detailed description of each product.
 - d. Provide a flowchart that details the complete production cycle for all plywood and plywood components supplied to the respondents identified in Attachment I. This should include descriptions of each stage of production and the locations of primary cost centers.

3. Provide a sales listing of all hardwood plywood and plywood components sold to customers in Vietnam during the POR.
 - a. Include the following information in individual columns:
 - Customer name;
 - Invoice number;
 - Invoice date;
 - Product description;
 - Self-produced or traded product
 - All core veneer species or materials used to produce the plywood or plywood component;
 - Core veneer country of origin
 - Face veneer species;
 - Back veneer species;
 - Number of plies;
 - Panel thickness;
 - Quantity;
 - Unit of measure;
 - Sales invoice value;
 - b. Tie the total quantity and value of the transactions included in the listing of sales during the POR to either your financial statements or, if you do not have audited financial statement, to a third-party verified source such as a tax return.

- c. Provide a complete set of sales documentation (*i.e.*, negotiation documentation, purchase order, commercial invoice, warehouse in/out slips, shipment documentation, payment documentation, documentation to demonstrate all wood species used in producing the wood components sold, and documentation demonstrating the country of origin for all wood components) for the largest quantity sale(s) to each of the respondents identified in Attachment I.
4. Please provide an inventory movement schedule that details for each wood input used in the production of **plywood components (regardless of country of origin)** for each month of the POR the following items:
 - a. opening inventory;
 - b. purchases;
 - c. consumption;
 - d. sales;
 - e. ending inventory.
5. Tie the above inventory movement schedules to your audited financial statements, or, if you do not have audited financial statements, tax returns.

Tracking of Hardwood Plywood Inputs

Respond to the following questions with respect to the plywood inputs used to produce the plywood components reported in the sales listing requested above.

6. Explain how you track the country of origin of the wood inputs used to produce hardwood plywood components. Provide documentation to support your response.
7. Please explain whether you are able to track the country of origin of the wood inputs used to produce the plywood components identified in your sales listing. Illustrate your explanation using source documentation supporting your response for the first and last transaction reported in your sales listing.
8. If you do not know the country of origin of some, or all, of the wood inputs used to produce your plywood components:
 - a. Identify the wood inputs for which you are unable to track the country of origin.
 - b. Explain why you do not know the country of origin of these wood inputs.

9. If you purchased wood inputs from suppliers, provide the following in an Excel worksheet (supplier worksheet):
 - a. name of each supplier;
 - b. the inputs each supplier provided;
 - c. whether supplier was an affiliate;
 - d. quantity and value of each input supplied by the supplier;
 - e. country of origin of each input supplied by the supplier.
10. Please identify all government or industry requirements/regulations related to tracking the country of origin for wood inputs and plywood components. Describe each requirement/regulation and provide the law, regulations, and/or rules.
11. If you purchased wood inputs or plywood components from suppliers, please identify the documentation the suppliers provided you to demonstrate the country of origin for each sale. For the largest volume supplied of each input identified in the supplier worksheet, provide this documentation.
12. Please identify the documentation you provided to each of the respondents with each sale of wood inputs, plywood components, and/or plywood. Provide documentation for the largest value supplied of each type of wood input, plywood component and plywood to each respondent under review.
13. Please provide the following information concerning your company's imports of wood inputs from China used to produce merchandise that it sold during the POR:
 - a. The quantity and value of each wood input imported from China before or during the POR that was used to produce plywood components sold during the POR.
 - b. A detailed description for each product imported, including wood species, dimensions, and intended use;
 - b. The identity of the supplier of each Chinese input (even if non-resident China exporter) and whether you are affiliated with that party;
 - c. Harmonized Tariff Schedule (HTS) subheading (of Vietnam, 8-digit level) under which product was imported;
 - d. Purpose of import (*e.g.*, face veneer, core veneer, multi-ply core panel, facility repairs, remained in inventory, *etc.*).

14. For each HTS subheading reported in response to subpart c above, provide the following:

- a. A complete set of Vietnam Customs clearance documentation for the first entry during the POR under each 8-digit subheading;
- b. A narrative explanation about, and documentation from your production system demonstrating, the consumption of those imports, or an explanation why such a demonstration is not possible (supported by documentation from your production system);
- c. A narrative explanation and documentation from your sales/production system demonstrating the sale of products containing those imported inputs during the POR.

Attachment III

GLOSSARY OF TERMS

This glossary is intended to provide parties with a basic understanding of many technical terms that appear in the antidumping questionnaire. These explanations are not regulations or rules with the force of law. As difficult or detailed questions arise, parties should seek clarification from the statute, regulations, and Commerce, rather than attempting to derive precise guidance from these general explanations.

Administrative Protective Order

An administrative protective order is the legal mechanism that controls the limited disclosure of business proprietary information to representatives of interested parties. Commerce authorizes the release of proprietary information under administrative protective order only when the representatives file a request in which they agree to the following four conditions: (a) to use the information only in the antidumping (AD) proceeding, (b) to secure the information and protect it from disclosure to any person not subject to an administrative protective order, (c) to report any violation of the terms of the protective order, and (d) to acknowledge that they may be subject to sanctions if they violate the terms of the order. (Section 777(c) of the Tariff Act of 1930, as amended (the Act). *See also* **Proprietary Information** and **Proprietary Treatment**.

Administrative Review

Administrative proceeding conducted by Commerce to determine the amount of AD duties that Customs will assess on imports of the subject merchandise during the period of review or to determine if a suspension agreement has been violated. Commerce also establishes new cash deposit rates for entered subject merchandise for each of the companies reviewed. (Section 751 of the Act.)

Affiliated Persons

The term affiliated persons (affiliates) includes: (1) members of a family; (2) an officer or director of an organization and that organization; (3) partners; (4) employers and employees; (5) any person directly or indirectly owning, controlling, or holding with power to vote, 5 percent or more of the outstanding voting stock or shares of any organization and that organization; (6) two or more persons directly or indirectly controlling, controlled by, or under common control with, any person; and (7) any person who controls any other person and that other person. Control exists when a person is legally or operationally in a position to exercise restraint or direction over another person. A control relationship should also have the potential to affect decisions concerning the production, pricing, or cost of the merchandise under investigation or review. (Section 771(33) of the Act; sections 351.102(b) and 351.401(f) of the regulations.)

Examples of situations which may indicate control include (but are not limited to): (a) joint ventures and franchises; (b) lender/borrower situations; (c) a close relationship with a supplier,

(sub) contractor, lender, distributor, exporter or reseller; and (d) a group of companies controlled by, for example, a family, a corporation, or the same investors. An example of affiliation by common control may be the affiliation between the owners of a joint venture when each owner is in a control position with that joint venture.

Section 351.102(b) of Commerce's regulations states that the term person includes any interested party as well as any other individual, enterprise, or entity, as appropriate. In Commerce's practice, the term person includes any company, individual, organization, partnership or group.

Antidumping Law and Regulations

The United States antidumping laws are set forth in Title VII of the Act (19 U.S.C. 1673 *et seq.*). Commerce's regulations governing antidumping proceedings are set forth at 19 CFR Part 351, published in the *Federal Register* on May 19, 1997 (62 FR 27379-27424), and September 20, 2021 (86 FR 52300-52384). For procedures governing Administrative Protective Orders and the treatment of proprietary information, please *see* 19 CFR Parts 351 and 354, published in the *Federal Register* on May 4, 1998 (63 FR 24391), and September 29, 2023 (88 FR 67069-67081).

Business Proprietary Information

Business proprietary information (BPI) is sensitive business data that would cause substantial harm to the submitting party if disclosed publicly. Examples of information that Commerce normally treats as business proprietary, if requested and not already in the public domain, include trade secrets concerning the production process, production and distribution costs, terms of sale, individual prices, and the names of customers and suppliers.

Certification of Accuracy

Any person that submits factual information to Commerce must include with the submission a certification of the completeness and accuracy of the factual information. Certifications must be made by a knowledgeable official responsible for presentation of the factual information and by the party's legal counsel or other representative, if any. A sample certification form is included as Appendix IV to the Q&V Questionnaire. (Section 782 (b) of the Act; section 351.303(g) of the regulations.)

Dumping

Dumping occurs when imported merchandise is sold in, or for export to, the United States at less than the normal value of the merchandise. The dumping margin is the amount by which the normal value exceeds the export price or constructed export price of the subject merchandise. The weighted-average dumping margin is the sum of the dumping margins divided by the sum of the export prices and constructed export prices.

Exporter

As a general matter, an exporter arranges for the sending or carrying abroad of merchandise. Most commonly, the exporter of merchandise takes possession of the merchandise and actively participates in the transport of merchandise to an importer. Should an intermediate party, who is not a reseller, be involved in export transactions, Commerce will focus primarily on the actual involvement of the intermediate party in the sale and transportation of the merchandise to determine which party is the “exporter” for AD/CVD purposes.

Facts Available

Commerce seeks to make its antidumping determinations on the basis of responses to its antidumping questionnaires. However, for a variety of reasons, the data needed to make such determinations may be unavailable or unusable. In such instances, the law requires Commerce to make its determinations on the basis of “the facts otherwise available” (more commonly referred to as “the facts available”). More specifically, Commerce must use the facts available if necessary information is not available on the record of an antidumping proceeding. In addition, Commerce must use the facts available where an interested party or any other person: (1) withholds information requested by Commerce; (2) fails to provide requested information by the requested date or in the form and manner requested; (3) significantly impedes an antidumping proceeding; or (4) provides information that cannot be verified.

In selecting the information to use as the facts available, the law authorizes Commerce to make an inference that is adverse to an interested party if Commerce finds that party failed to cooperate by not acting to the best of its ability to comply with a request for information. However, the law also provides that when Commerce relies on secondary information rather than on information obtained in the course of an antidumping proceeding, Commerce must, to the extent practicable, corroborate that information from independent sources that are reasonably at Commerce’s disposal.

Submitted information that does not meet all of the requirements may be used if: (1) the information is submitted within applicable deadlines; (2) the information can be verified; (3) the information is not so incomplete that it cannot serve as a reliable basis for a determination; (4) the party establishes that it acted to the best of its ability; and (5) Commerce can use the information without undue difficulties. Finally, if an interested party promptly informs Commerce of difficulties it is having in responding to a request for information, Commerce will consider modifying its request to the extent necessary to avoid imposing an unreasonable burden on the party. (Sections 776 and 782(c)-(e) of the Act; section 351.308 of the regulations.)

Non-Market Economy

A non-market economy country is any country that Commerce determines does not operate on market principles. Commerce considers the following factors about a foreign country in making these decisions: (1) the extent to which the currency is convertible; (2) the extent to which wage rates are determined by free bargaining between labor and management; (3) the extent to which joint ventures or foreign investment are permitted; (4) the extent of government ownership or

control of means of production; (5) the extent of government control over allocation of resources and over the price and output decisions of enterprises; and (6) other factors Commerce considers appropriate. (Section 771(18)(B) of the Act.)

Regulations

See Antidumping Law and Regulations

Verification

To establish the adequacy and accuracy of information submitted in response to questionnaires and other requests for information, Commerce examines the records of the party that provided the information and interviews company personnel who prepared the questionnaire response and are familiar with the sources of the data in the response. This process is called verification. Commerce will verify information relied upon in making a final determination in an investigation, or in an administrative review when revocation of an antidumping order is properly requested. Commerce also will verify information submitted in an administrative review if an interested party so requests and no verification of the producer or exporter had been conducted during the two immediately preceding reviews of that producer or exporter, or if good cause for verification is shown. (Section 782(i) of the Act; section 351.307 of the regulations.)

Attachment IV-A Scope of the AD/CVD Orders

The merchandise covered by these reviews is hardwood and decorative plywood, and certain veneered panels as described below. For purposes of these proceedings, hardwood and decorative plywood is defined as a generally flat, multilayered plywood or other veneered panel, consisting of two or more layers or plies of wood veneers and a core, with the face and/or back veneer made of non-coniferous wood (hardwood) or bamboo. The veneers, along with the core may be glued or otherwise bonded together. Hardwood and decorative plywood may include products that meet the American National Standard for Hardwood and Decorative Plywood, ANSI/HPVA HP-1-2016 (including any revisions to that standard).

For purposes of these *Orders* a “veneer” is a slice of wood regardless of thickness which is cut, sliced or sawed from a log, bolt, or flitch.¹ The face and back veneers are the outermost veneer of wood on either side of the core irrespective of additional surface coatings or covers as described below.

The core of hardwood and decorative plywood consists of the layer or layers of one or more material(s) that are situated between the face and back veneers. The core may be composed of a range of materials, including but not limited to hardwood, softwood, particleboard, or medium-density fiberboard (MDF).

All hardwood plywood is included within the scope of these *Orders* regardless of whether or not the face and/or back veneers are surface coated or covered and whether or not such surface coating(s) or covers obscures the grain, textures, or markings of the wood. Examples of surface coatings and covers include, but are not limited to: ultra violet light cured polyurethanes; oil or oil-modified or water based polyurethanes; wax; epoxy-ester finishes; moisture-cured urethanes; paints; stains; paper; aluminum; high pressure laminate; MDF; medium density overlay (MDO); and phenolic film. Additionally, the face veneer of hardwood plywood may be sanded; smoothed or given a “distressed” appearance through such methods as hand-scraping or wire brushing. All hardwood plywood is included within the scope even if it is trimmed; cut-to-size; notched; punched; drilled; or has undergone other forms of minor processing.

All hardwood and decorative plywood is included within the scope of these *Orders*, without regard to dimension (overall thickness, thickness of face veneer, thickness of back veneer, thickness of core, thickness of inner veneers, width, or length). However, the most common panel sizes of hardwood and decorative plywood are 1219 x 1829 mm (48 x 72 inches), 1219 x 2438 mm (48 x 96 inches), and 1219 x 3048 mm (48 x 120 inches).

Subject merchandise also includes hardwood and decorative plywood that has been further processed in a third country, including but not limited to trimming, cutting, notching, punching, drilling, or any other processing that would not otherwise remove the merchandise from the

¹See *Certain Hardwood Plywood Products from the People’s Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order*, 83 FR 504 (January 4, 2018); see also *Certain Hardwood Plywood Products from the People’s Republic of China: Countervailing Duty Order*, 83 FR 513 (January 4, 2018) (collectively, *Orders*).

scope of these *Orders* if performed in the country of manufacture of the in-scope product.

The scope of these *Orders* excludes the following items: (1) structural plywood (also known as “industrial plywood” or “industrial panels”) that is manufactured to meet U.S. Products Standard PS 1-09, PS 2-09, or PS 2-10 for Structural Plywood (including any revisions to that standard or any substantially equivalent international standard intended for structural plywood), and which has both a face and a back veneer of coniferous wood; (2) products which have a face and back veneer of cork; (3) multilayered wood flooring, as described in the antidumping duty and countervailing duty orders on multilayered wood flooring from the People’s Republic of China, Import Administration, International Trade Administration. *See Multilayered Wood Flooring from the People’s Republic of China*, 76 FR 76690 (December 8, 2011) (amended final determination of sales at less than fair value (LTFV) and AD order); and *Multilayered Wood Flooring from the People’s Republic of China*, 76 FR 76693 (December 8, 2011) (countervailing duty order), as amended by *Multilayered Wood Flooring from the People’s Republic of China: Amended Antidumping and Countervailing Duty Orders*, 77 FR 5484 (February 3, 2012); (4) multilayered wood flooring with a face veneer of bamboo or composed entirely of bamboo; (5) plywood which has a shape or design other than a flat panel, with the exception of any minor processing described above; (6) products made entirely from bamboo and adhesives (also known as “solid bamboo”); and (7) Phenolic Film Faced Plyform (PFF), also known as Phenolic Surface Film Plywood (PSF), defined as a panel with an “Exterior” or “Exposure 1” bond classification as is defined by The Engineered Wood Association, having an opaque phenolic film layer with a weight equal to or greater than 90g/m³ permanently bonded on both the face and back veneers and an opaque, moisture resistant coating applied to the edges.

On July 14, 2023, Commerce determined that imports of hardwood plywood completed in Vietnam using hardwood plywood inputs (face veneer, back veneer, and/or either an assembled core or individual core veneers) manufactured in China, or Chinese hardwood plywood inputs (assembled cores, multi-ply core panels, or individual core veneers) combined in Vietnam with other inputs (face and/or back veneers) manufactured in Vietnam or third countries, and subsequently exported to the United States, were circumventing these *Orders*. Accordingly, these *Orders* include hardwood plywood that is exported to the United States that is completed in Vietnam under the following scenarios:

1. Face veneer, back veneer, and assembled core components (*e.g.*, veneer core platforms) manufactured in China and assembled in Vietnam;
2. Fully assembled veneer core platforms manufactured in China that are combined in Vietnam with face and/or back veneers produced in Vietnam or third countries;
3. Multi-ply panels of glued core veneers manufactured in China that are combined in Vietnam to produce veneer core platforms and combined with either a face and/or back veneer produced in China, Vietnam, or a third country;
4. Face veneer, back veneer, and individual core veneers produced in China and assembled into hardwood plywood in Vietnam; and
5. Individual core veneers manufactured in China and processed into a veneer core platform in Vietnam and combined with a face and/or back veneer produced in Vietnam or other third country.

Excluded from the scope of these *Orders* are wooden furniture goods that, at the time of importation, are fully assembled and are ready for their intended uses. Also excluded from the scope of these *Orders* is “ready to assemble” (RTA) furniture. RTA furniture is defined as (A) furniture packaged for sale for ultimate purchase by an end-user that, at the time of importation, includes (1) all wooden components (in finished form) required to assemble a finished unit of furniture, (2) all accessory parts (e.g., screws, washers, dowels, nails, handles, knobs, adhesive glues) required to assemble a finished unit of furniture, and (3) instructions providing guidance on the assembly of a finished unit of furniture; (B) unassembled bathroom vanity cabinets, having a space for one or more sinks, that are imported with all unassembled hardwood and hardwood plywood components that have been cut-to-final dimensional component shape/size, painted or stained prior to importation, and stacked within a singled shipping package, except for furniture feet which may be packed and shipped separately; or (C) unassembled bathroom vanity linen closets that are imported with all unassembled hardwood and hardwood plywood components that have been cut-to-final dimensional shape/size, painted or stained prior to importation, and stacked within a single shipping package, except for furniture feet which may be packed and shipped separately.

Excluded from the scope of these *Orders* are kitchen cabinets that, at the time of importation, are fully assembled and are ready for their intended uses. Also excluded from the scope of these *Orders* are RTA kitchen cabinets. RTA kitchen cabinets are defined as kitchen cabinets packaged for sale for ultimate purchase by an end-user that, at the time of importation, includes: (1) all wooden components (in finished form) required to assemble a finished unit of cabinetry; (2) all accessory parts (e.g., screws, washers, dowels, nails, handles, knobs, hooks, adhesive glues) required to assemble a finished unit of cabinetry; and (3) instructions providing guidance on the assembly of a finished unit of cabinetry.

Excluded from the scope of these *Orders* are finished table tops, which are table tops imported in finished form with pre-cut or drilled openings to attach the underframe or legs. The table tops are ready for use at the time of import and require no further finishing or processing.

Excluded from the scope of these *Orders* are finished countertops that are imported in finished form and require no further finishing or manufacturing.

Excluded from the scope of these *Orders* are laminated veneer lumber door and window components with: (1) a maximum width of 44 millimeters, a thickness from 30 millimeters to 72 millimeters, and a length of less than 2413 millimeters; (2) water boiling point exterior adhesive; (3) a modulus of elasticity of 1,500,000 pounds per square inch or higher; (4) finger-jointed or lap-jointed core veneer with all layers oriented so that the grain is running parallel or with no more than 3 dispersed layers of veneer oriented with the grain running perpendicular to the other layers; and (5) top layer machined with a curved edge and one or more profile channels throughout.

Excluded from the scope of these *Orders* are certain door stiles and rails made of LVL that have a width not to exceed 50 millimeters, a thickness not to exceed 50 millimeters, and a length of less than 2,450 millimeters.

Imports of hardwood plywood are primarily entered under the following HTSUS subheadings:

4412.10.0500;4412.31.0520; 4412.31.0540; 4412.31.0560; 4412.31.0620; 4412.31.0640;
4412.31.0660; 4412.31.2510; 4412.31.2520; 4412.31.2610; 4412.31.2620;4412.31.4040;
4412.31.4050; 4412.31.4060; 4412.31.4075; 4412.31.4080; 4412.31.4140; 4412.31.4150;
4412.31.4155; 4412.31.4160; 4412.31.4180; 4412.31.4200; 4412.31.4500; 4412.31.4850;
4412.31.4860; 4412.31.4863; 4412.31.4865; 4412.31.4866; 4412.31.4880; 4412.31.4869;
4412.31.5125; 4412.31.5135; 4412.31.5155; 4412.31.5165; 4412.31.5175; 4412.31.5235;
4412.31.5255; 4412.31.5260; 4412.31.5262; 4412.31.5264; 4412.31.5265; 4412.31.5266;
4412.31.5268; 4412.31.5270; 4412.31.5275; 4412.31.6000; 4412.31.6100; 4412.31.9100;
4412.31.9200; 4412.32.0520; 4412.32.0540; 4412.32.0565; 4412.32.0570; 4412.32.0620;
4412.32.0640; 4412.32.0670; 4412.32.2510; 4412.32.2525; 4412.32.2530; 4412.32.2610;
4412.32.2630; 4412.32.3125; 4412.32.3135; 4412.32.3155; 4412.32.3165; 4412.32.3175;
4412.32.3185; 4412.32.3235; 4412.32.3255; 4412.32.3265; 4412.32.3275; 4412.32.3285;
4412.32.5600; 4412.32.5700; 4412.33.0620; 4412.33.0640; 4412.33.0670; 4412.33.2630;
4412.33.3235; 4412.33.3255; 4412.33.3265; 4412.33.3275; 4412.33.3285; 4412.33.5700;
4412.34.2600; 4412.34.3235; 4412.34.3255; 4412.34.3265; 4412.34.3275; 4412.34.3285;
4412.34.5700; 4412.39.1000; 4412.39.3000; 4412.39.4011; 4412.39.4012; 4412.39.4019;
4412.39.4031; 4412.39.4032; 4412.39.4039; 4412.39.4051; 4412.39.4052; 4412.39.4059;
4412.39.4061; 4412.39.4062; 4412.39.4069; 4412.39.5010; 4412.39.5030; 4412.39.5050;
4412.41.0000; 4412.42.0000; 4412.51.1030; 4412.51.1050; 4412.51.3111; 4412.51.3121;
4412.51.3141; 4412.51.3161; 4412.51.3175; 4412.51.4100; 4412.51.5100; 4412.52.1030;
4412.52.1050; 4412.52.3121; 4412.52.3161; 4412.52.3175; 4412.52.4100; 4412.52.5100;
4412.91.0600; 4412.91.1020; 4412.91.1030; 4412.91.1040; 4412.91.3110; 4412.91.3120;
4412.91.3130; 4412.91.3140; 4412.91.3150; 4412.91.3160; 4412.91.3170; 4412.91.4100;
4412.91.5115; 4412.92.0700; 4412.92.1120; 4412.92.1130; 4412.92.1140; 4412.92.3120;
4412.92.3150; 4412.92.3160; 4412.92.3170; 4412.92.4200; 4412.92.5215; 4412.94.1030;
4412.94.1050; 4412.94.3105; 4412.94.3111; 4412.94.3121; 4412.94.3141; 4412.94.3161;
4412.94.3175; 4412.94.4100; 4412.99.0600; 4412.99.1020; 4412.99.1030; 4412.99.1040;
4412.99.3110; 4412.99.3120; 4412.99.3130; 4412.99.3140; 4412.99.3150; 4412.99.3160;
4412.99.3170; 4412.99.4100; 4412.99.5115; 4412.99.5710; and 9403.91.0080.

Imports of hardwood plywood may also enter under HTSUS subheadings 4412.10.9000;
4412.94.5100; 4412.94.9500; 4412.99.6000; 4412.99.7000; 4412.99.8000; 4412.99.9000;
4412.99.9500; 9403.90.7005; 9403.90.7010; 9403.90.7080; 9403.91.0005; and 9403.91.0010.

While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these *Orders* is dispositive.

Attachment IV-B

Description of Hardwood Plywood Subject to Certification Eligibility Reviews

For the purpose of certification eligibility reconsideration, the hardwood plywood for which we are requesting information meets the description above (Attachment IV-A) *without regard to the country of origin of wood inputs*. This description is physical in nature, only. The respondent is required to report all of its entries of hardwood plywood to the United States² that meet this physical description, including entries of hardwood plywood completed in Vietnam using non-Chinese wood inputs.

Merchandise Covered by the *Circumvention Determination*

On July 14, 2023, Commerce determined that imports of hardwood plywood completed in Vietnam using hardwood plywood inputs (face veneer, back veneer, and/or either an assembled core or individual core veneers) manufactured in China, or Chinese hardwood plywood inputs (assembled cores, multi-ply core panels, or individual core veneers) combined in Vietnam with other inputs (face and/or back veneers) manufactured in Vietnam or third countries, and subsequently exported to the United States, were circumventing the *Orders* on hardwood plywood from China.³ Accordingly, we determined that the *Orders* include hardwood plywood that is exported to the United States and that is completed in Vietnam under any of five specific scenarios, identified in the scope, that are related to certain wood inputs.⁴ However, for these certification eligibility reviews, all hardwood plywood that is suspended as Type 3 is under review, regardless of where the wood inputs were manufactured/processed.

² In the absence of entries, please report shipments to the United States.

³ See *Certain Hardwood Plywood Products from the People's Republic of China: Final Scope Determination and Affirmative Final Determination of Circumvention of the Antidumping and Countervailing Duty Orders*, 88 FR 46740 (July 20, 2023), and accompanying Issues and Decision Memorandum.

⁴ See Attachment IV-A.