



October 18, 2017

The Honorable Rhonda K. Schmidlein, Chairman
The Honorable David S. Johanson, Vice Chairman
The Honorable Irving Williamson, Commissioner
The Honorable Meredith Broadbent, Commissioner
United States International Trade Commission
500 E Street, SW
Washington, D.C. 20436
VIA EDIS

Re: Hardwood Plywood from China (701-TA-565 and 731-TA-1341 (Final))

Dear Commissioners:

We are writing¹ to urge you to vote in the negative in the antidumping/countervailing duty case on Hardwood Plywood from China. The Commission has considered this same case before and voted unanimously to terminate it in 2013; the Commission should do so again.

Our associations collectively represent hundreds of thousands of American jobs including manufacturing jobs that rely on access to both domestic and global raw materials to remain competitive. One such product is hardwood plywood, where imported plywood has historically played a complementary role in the market alongside domestic hardwood plywood.

The RVIA is the lead trade association for the recreational vehicle industry, which includes nearly 300,000 American jobs contributing \$50 Billion to the U.S. economy. The NAHB is the lead trade association of the American home building industry. NAHB's 140,000 members construct about 80 percent of new single family and multifamily homes in the United States. Homebuilding and remodeling account for approximately 12-15% of the U.S. GDP. The IWPA is the leading international trade association for the North American imported wood products industry, representing 200 companies and trade organizations engaged in the import of hardwoods and softwoods from sustainably managed forests in more than 30 nations across the globe.

¹ Our comments constitute a written statement of information and are timely filed prior to the November 2 deadline pursuant to the Commission's July 11, 2017 scheduling notice.

These American jobs depend on both domestic and global raw materials. In hardwood plywood, imported plywood has always played a role in the market complementary with domestic hardwood plywood. Domestic and Chinese plywood are physically different and used for different purposes, as the Commission heard during the preliminary phase investigation from the AAHP. We agree with and support the American Alliance for Hardwood Plywood on this important point. Whether in the manufacturing of kitchen cabinets or other household cabinetry, the construction of new homes and residential remodeling incorporating cabinetry and flooring, the manufacturing of recreational vehicles and related components or a variety of other end use products, the Chinese plywood is used in ways and for applications that domestic plywood is not.

We are concerned that if this case moves forward to final antidumping and countervailing duties there will be unintended negative consequences on our industries, our members and their employees that collectively far outnumber those of petitioners – both in terms of employment and contribution to the economy. In order to remain competitive, our industries rely on the ability to choose the proper wood product with the most appropriate performance characteristics for each specific application. Because the Chinese plywood differs so significantly from domestic plywood, unfair trade duties are unlikely to result in any increased sales of domestic plywood. Rather, the industries consuming the Chinese plywood will be replaced by plywood from other import sources that share similar characteristics.

We respect that the companies who filed this unfair trade action have the right to petition the government on behalf of their roughly 2,000 employees and have their grievances heard. We also respect the need to ensure that United States trade laws are fully and fairly applied when the facts and the law require a remedy. In this case, however, the facts do not support an affirmative determination.

On behalf of our associations and the hundreds of thousands of American workers they represent, we urge the Commission to consider the important differences between domestic and Chinese plywood and make a negative final determination just as it did in 2013.

Respectfully submitted,

International Wood Products Association
National Association of Home Builders
Recreation Vehicle Industry Association