Polytetrafluoroethylene From China and India
Inv. 701-TA-588 and 731-TA-1392-1393

Presentation on Behalf of Indian Respondent Gujarat and GFL America

International Trade Commission Preliminary Conference
October 19, 2017
Matthew M Nolan
Andrew Jaxa –Debicki
Arent Fox LLP
Gujarat Fluorochemicals Limited and GFL Americas, LLC

- Gujarat Fluorochemicals is part of the INOX group of companies in India. [https://www.gfl.co.in/](https://www.gfl.co.in/)
- GFL holds market leadership positions in Industrial gases, refrigerants, Chemicals, Cryogenic Engineering, renewable Energy and entertainment.
- GFL’s chemical complex commenced operations in the year 2007 at Dahej, Gujarat. It has grown to become a highly integrated and technologically advanced chemical complex which comprises of a Caustic Soda / Chlorine plant, a Chloromethane plant, and combined coal and gas based captive power plant.
- PTFE accounts for approximately 1/3 of total turnover.
- GFL Americas is GFL's US affiliate and operates its own blending facility and warehouse in Texas where it sells PTFE on behalf of GFL and further process PTFE into “filled PTFE” for specific customer applications.
- GFL sells mostly Suspension PTFE (Chemours sells mostly emulsion).
What is Polytetrafluoroethylene Resin?
Market Segments for PTFE

- Oil & Gas 25%
- Electronics/Telecom 23%
- Automotive 12%
- Food/Pharma 7%
- Other 33%
GFL Products
PTFE is a Technology Material With Multiple Types and Specifications within type: It is not ONE Product

- Emulsion grades
  - Aqueous Dispersion
  - Fine Powder
- Suspension grades
  - Fine cut
  - Pre-sintered free flow
  - Modified PTFE

Some Chemours Products
- Teflon AF
- Teflon FEP
- Teflon FFR
- Teflon PFA
- Teflon PTFE
- Tefzel ETFE
- Zonyl PTFE
- ECCtreme ECA
PTFE and other Products are made from

- Tetrafluoroethylene, also referred to as TFE, is a monomer for making PTFE and other fluoropolymers such as PFA, FEP, ETFE etc.

- PTFE Production is dependent on TFE availability and competes with other products. Impacts Utilization.
U.S. Producer Profile

• Chemours: Petitioner, does not represent the whole industry.
• Daikin America: did not join the petition, a major U.S. producer.
• Chemours is a multinational company with multiple product lines.
• Chemours is investing $230 million on a Texas refrigerant plant, $600 million on a titanium dioxide plant in Mexico.
• Chemours opened a Chinese Teflon production operation, Chemours (Changsu) Flouro Technology in 2016, $15 million.
• Chemours produces a variety of fluoropolymers (Teflon, Viton, Krytoc, Nafion), all based on TFE.
Import Volumes Do Not Support an Injury case

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<tbody>
<tr>
<td>Chinese Imports</td>
<td>3,187</td>
<td>3,112</td>
<td>3,057</td>
<td>1,448</td>
<td>1,662</td>
<td>-4.08%</td>
<td>214</td>
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<tr>
<td>Indian Imports</td>
<td>1,777</td>
<td>1,777</td>
<td>1,716</td>
<td>665</td>
<td>1,522</td>
<td>-3.43%</td>
<td>857</td>
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<td>total subject</td>
<td>4,964</td>
<td>4,889</td>
<td>4,773</td>
<td>2,113</td>
<td>3,184</td>
<td>-3.85%</td>
<td>1,071</td>
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<tr>
<td>Italy</td>
<td>2,223</td>
<td>2,997</td>
<td>2,536</td>
<td>1,319</td>
<td>770</td>
<td>14.08%</td>
<td>-549</td>
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<tr>
<td>Japan</td>
<td>1,422</td>
<td>1,380</td>
<td>1,359</td>
<td>618</td>
<td>437</td>
<td>-4.43%</td>
<td>-181</td>
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<tr>
<td>Netherlands</td>
<td>1,361</td>
<td>1,042</td>
<td>1,761</td>
<td>877</td>
<td>674</td>
<td>29.39%</td>
<td>-203</td>
</tr>
<tr>
<td>Russia</td>
<td>1,655</td>
<td>854</td>
<td>1,162</td>
<td>766</td>
<td>469</td>
<td>-29.79%</td>
<td>-297</td>
</tr>
<tr>
<td>Total Non subject imports</td>
<td>10,054</td>
<td>9,746</td>
<td>9,762</td>
<td>5,121</td>
<td>3,761</td>
<td>-2.90%</td>
<td>-1,360</td>
</tr>
<tr>
<td>All imports</td>
<td>15,018</td>
<td>14,635</td>
<td>14,535</td>
<td>7,234</td>
<td>6,945</td>
<td>-3.22%</td>
<td>-289</td>
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</table>

Source: USITC Dataweb
US Exports of PTFE During POI

2014-2017 Annualized

2015 2016 2017 (annualized)

+1,446 over 2016 +14.5%

Interim 2016/2017 Exports

Jan-Jun 2016 Jan-June 2017

+447 MT +8.5%

Source: USITC DATAWEB
Price Issues

• Petition indicates all subject product pay 5.8% duty rate and based price comparisons on landed costs with duty paid. Correction: China pays the 5.8%, India does not under GSP program which affects landed prices.

• Aggregating data on AUVs masks significant differences between pricing of products: granular, Dispersion, and coagulated dispersion (fine powder) are priced differently.

• No evidence of price suppression based on a close reading of the data.
Some Key issues

- Industry support
- Highly specialized products/applications. Non-substitutable.
- Aged Chemours plant
- Competing Investment priorities
- Chemours main US customers will not purchase imports. Price inelastic.
- No volume effects from subject imports.
- Subject imports compete with/displace non-subject.
- Examine market share impact.
- TFE production bottleneck issue.
- Price effects – India will be somewhat lower, but conditions of competition relevant, further processing in US before sale, extreme delivery lag times.