

# Anti-Dumping/Countervailing

Multilayered Wood Flooring from China

- Case A570-970, C570-971

Multilayered Wood Flooring =

Wood flooring composed of an assembly of two or more layers or plies in combination with a core

AKA: “Engineered Wood Flooring” or “Plywood Flooring

# Anti-Dumping/Countervailing

What is FLOORING?

FLOORING is a *dedicated* product. Flooring is a finished product that is intended at the time of importation to be used as a floor covering.

What makes it dedicated?

Flooring is dedicated for its use by shaping (i.e., tongue and groove, precise dimensions, sanding), its finish (e.g., stain, UV coating, polyurethane), and marketing

# Anti-Dumping/Countervailing

Is plywood FLOORING?

**NO!**

Plywood is a MATERIAL, not a dedicated product.

Plywood is not dedicated for a specific use.

Even if it is called “subflooring” on an invoice, plywood can be used to make floors, walls, roofs, furniture, skateboard ramps, and many other things.



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# Anti-Dumping/Countervailing

## What's covered?

Multilayer wood flooring regardless of:

- Thickness of layers
- Wood species
- Finish
- Joinery
- Industry standard
- Shape



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# Anti-Dumping/Countervailing

## What's covered?

Multilayer wood flooring regardless of:

### CORE

May be hardwood or softwood

Particleboard

Medium Density Fiberboard (MDF)

High Density Fiberboard (HDF)

Stone and/or plastic composite

Strips of lumber placed edge-to-edge



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# Anti-Dumping/Countervailing

What is exempt?

- Cork flooring
- Bamboo Flooring (includes bamboo face on plywood substrate)
- Laminate flooring, i.e., fiberboard flooring



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# Heading 4412

Classifying plywood, veneered panels, or similar laminated wood,

You **MUST** know:

- Is it multilayer? How many layers?
- The thickness of each ply or layer, particularly the face ply
- The species of wood comprising the front and back plies
  - Is the wood a tropical wood of Note 2 to Ch. 44?
  - Is the wood coniferous or non-coniferous?
- Is it of a plywood construction?



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# Heading 4412

## Classifying plywood or engineered flooring

### You MUST know:

- Is the wood surface covered? Does the covering obscure the grain?
- Which outer ply is the face and which is the back?
  - Are they equal in grade?
  - Can both outer plies function as the face?
- The function of the product – is it flooring or a material?



# Heading 4412

Classifying plywood or engineered flooring

## *Outer ply vs. Face ply*

- Outer plies include both the face AND back plies
- Face ply is the ply intended to be the visible surface:

Usually the higher grade outer ply

If the outer plies are of the same grade or are interchangeable, either may be the face ply. In this case, goods are classifiable according to GRI 3(c)



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