KING & SPALDING

1700 Pennsylvania Avenue, NW
Washington, DC 20006-4706
Phone: 202/737-0500
Fax: 202/626-3737
www.kslaw.com

January 19, 2021

The Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112A
Washington, DC 20436

Case No. 201-TA-077
Total Pages: 446

Business Proprietary Information Deleted from Pages 3, 5, 7, 9, 10, and 14, the Exhibit List, and Exhibits 1, 2, 4, 9, 10, 17-20, 23-25, 31, 34 and 47.

PUBLIC VERSION

Re: Fresh, Chilled, or Frozen Blueberries / Post-Hearing Brief of American Blueberry Growers Alliance

Dear Madam Secretary:

On behalf of American Blueberry Growers Alliance, we hereby submit this post-hearing brief for consideration by the International Trade Commission ("Commission") in the above-referenced investigation. This brief is filed in accordance with sections 201.8, 206.7, and 206.8 of the Commission's rules.

Pursuant to 19 C.F.R. § 201.6 of the Commission's rules, we request business proprietary treatment for new record information contained in brackets on pages 3, 5, 7, 9, 10, and 14, the Exhibit List, and Exhibits 1, 2, 4, 9, 10, 17-20, 23-25, 31, 34, and 47. Disclosure of this information, which is not otherwise publicly available, would cause substantial harm to the competitive position of the submitter and would impair the ability of the Commission to obtain information in the future necessary to fulfill its statutory functions. The requisite certification that

substantially identical information is not available to the public is set forth as an attachment to this letter, in accordance with section 201.6(b) of the Commission's rules.

All other business proprietary information cited in this submission is already on the record of these investigations.

If you have any questions regarding this brief, please contact the undersigned.

Respectfully submitted,

/s/ Stephen J. Orava
Stephen J. Orava
Bradford L. Ward
Jamieson L. Greer
Bonnie B. Byers, Consultant

KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Washington, D.C. 20006
(202) 737-0500

Counsel for American Blueberry Growers Alliance

CERTIFICATION OF COUNSEL

City of Washington)
) ss:
District of Columbia)

In accordance with section 206.8(a) of the Commission's regulations, 19 C.F.R. § 206.8(a), I, Stephen J. Orava, of King & Spalding LLP, hereby certify that (1) I have read the attached submission, and (2) the information contained in this submission is accurate and complete to the best of my knowledge.

In addition, I acknowledge that any information submitted to the Commission throughout this proceeding or other proceedings may be disclosed to and used: (i) By the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. All contract personnel will sign appropriate nondisclosure agreements.

Dated: January 19, 2021

CERTIFICATE OF SERVICE

This is to certify that on January 21, 2021, I have caused a copy of the foregoing **PUBLIC SUBMISSION** to be served upon the following parties via the method indicated at the following addresses:

VIA ELECTRONIC SERVICE:

Daniel L. Porter, Esq.
Curtis, Mallet-Prevost, Colt & Mosle LLP
1717 Pennsylvania Ave, NW
Washington. DC 20006
dporter@curtis.com

Lynn Fischer Fox, Esq.
Arnold & Porter Kaye Scholer, LLP
601 Massachusetts Ave, NW
Washington, DC 20001
lynn fischerfox@arnoldporter.com

Matthew R. Nicely, Esq.
Akin Gump Strauss Hauer & Feld LLC
2001 K Street NW
Washington DC 20006
mnicely@akingump.com

Gregory J. Spak, Esq.
White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005
gspak@whitecase.com
apotrade@whitecase.com

Matthew J. Clark. Esq.
Arent Fox LLP
1717 K Street, NW
Washington, DC 20006
matthew.clark@arentfox.com

Jack A. Levy, Esq.
Cassidy Levy Kent (USA) LLP
900 19th St. NW
Suite 400
Washington DC 20006
jlevy@cassidylevy.com
records@cassidylevy.com

Stephan E. Becker, Esq.
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth St, NW
Washington, DC 20036
stephan.becker@pillsburylaw.com

Jeffrey S. Neeley, Esq.
Husch Blackwell LLP
750 17th Street, NW
Suite 900
Washington, DC 20006
jeffrey neeley@huschblackwell.com

Minister Pablo Rodriguez Brizuela
Embassy of the Republic of Argentina
1600 New Hampshire Ave, NW
Washington, DC 20009
econargusa@embassyofargentina.us
eeeuu@mrecic.gov.ar

Sibylle Zitko
Delegation of the EU to the United States
2175 K St, NW
Washington, DC 20037
Sibylle.Zitko@eeas.europa.eu

Gabriel Braga
Embassy of Brazil
3006 Massachusetts Ave., NW
Washington, DC 20008
gabriel.braga@itamaraty.gov.br

Alejandro Rodriguez
Embassy of Uruguay
1913 I St, NW
Washington, DC 20006
dec.urueeuu@mrree.gub.uy
urueeuu@mree.gub.uy

Thomas E. Skilton, Esq.
Cameron LLP
818 Connecticut Ave, N.W.
Suite 1200
Washington, D.C. 20006
tskilton@cameronllp.com

Lawrence J. Bogard, Esq.
Neville Peterson LLP
1400 16th Street, NW
Suite 350
Washington, D.C. 20036
lbogard@npwdc.com

Thomas J. Trendl, Esq.
Steptoe & Johnson LLP
1330 Connecticut Ave, NW
Washington, D.C. 20036
ttrendl@steptoe.com

Adams Lee, Esq.
Harris Bricken Sliwoski, LLP
600 Stewart St.
Suite 1200
Seattle, WA 98101
adams@harrisbricken.com

Spencer S. Griffith, Esq.
Akin Gump Strauss Hauer & Feld LLP
2001 K Street, NW
Washington, DC 20006
sgriffith@akingump.com

Elena G Nosyreva
Ministry of Economic Development of the Russian Federation
Presnenskaya Naberezhnaya, 10/2
Moscow, Russia 125039
nosyrevaEG@economy.gov.ru

Julie C. Mendoza, Esq.
Morris, Manning & Martin, LLP
1401 Eye Street, N.W.
Suite 600
Washington, D.C. 20005
jmendoza@mmmlaw.com
Tradeservice@mmmlaw.com

Mr. Wijayanto
Embassy of Indonesia
2020 Massachusetts Ave, NW
Washington, DC 20036
wijayanto@embassyofindonesia.org

Mrs. Pradnyawati
Ministry of Trade of Indonesia
JI. M. I. Ridwan Rais No. 5 Gedung 11 Lt. 10
Jakarta Pusat, Indonesia 10110 1.
pradnyawati@kemendag.go.id
pradnyawati@gmail.com

/s/ Stephen J. Orava
Stephen J. Orava
KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 737-0500

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PUBLIC VERSION

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BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION

IN THE MATTER OF **FRESH, CHILLED, OR FROZEN BLUEBERRIES**	**POSTHEARING BRIEF OF THE AMERICAN BLUEBERRY GROWERS ALLIANCE**

Charles Anderson
Andrew Szamosszegi
Travis Pope
Nathan Smith

CAPITAL TRADE, INC.
1200 18th Street, NW
Washington, DC 20036
(202) 463-1850

Stephen J. Orava
Bradford L. Ward
Jamieson L. Greer
Bonnie B. Byers, Consultant

KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Washington, D.C. 20006
(202) 737-0500

Counsel for American Blueberry Growers Alliance

January 19, 2021

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I. INTRODUCTION

Imported blueberries flooded this market throughout the POI, and despite growing demand, this oversupply pushed prices so low that U.S. growers' profitability sharply declined. Below, the American Blueberry Growers Alliance (the "Alliance") demonstrates that the evidence compels an affirmative finding of serious injury to the domestic industry. In particular, the Alliance discusses key points that arose during the January 12, 2021 Hearing in this investigation. The Alliance also provides answers to the Commissioners questions at the hearing (attached as **Economic Appendix** and **Exhibit 1**).

II. THE COMMISSION'S MULTIFACTOR ANALYSIS SHOWS THAT THERE IS A DOMESTIC INDUSTRY PRODUCING A SINGLE LIKE PRODUCT

The Commission's analysis in a Section 201 investigation begins by identifying the domestic industry that produces "an article like or directly competitive with the imported article."[1] The Commission's analysis looks at a variety of factors rather than a set list.[2] The Commission has considered a product's physical properties, customs treatment, where it is made, how it is made, its uses, and the relevant marketing channels. The Commission ultimately "looks for clear dividing lines between products, disregarding minor variations."[3]

The evidence on the record and the discussion during the Hearing show that there is not a "clear dividing line" between fresh and frozen blueberries. Fresh and frozen blueberries are genetically identical, grow from the same bushes, come from the same varieties, are cultivated in the same way, are harvested by hand-picking or machine, undergo the same inspection and sorting process, are packaged and stored to extend shelf life, are largely purchased by the same type of customers, and are ultimately used for human consumption in similar end uses. Frozen

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[1] 19 U.S.C. § 2252(b)(1)(A).

[2] *Crystalline Silicon Photovoltaic Cells (Whether or not Partially or Fully Assembled into Other Products)* ("CSPV "), Inv. No. 201-TA-075, USITC Pub. 4739, at 11 (Nov. 2017).

[3] *Id.*

blueberries undergo freezing and fresh blueberries are packed in clam shells and chilled, and their distribution channels differ somewhat, but these variations do not detract from the strong overlap between the physical properties, production, and sale of fresh and frozen blueberries. Exhibit 1 attached hereto provides more detail and description for each of these factors.[4]

Blueberries are an agricultural product. The bulk of the production assets employed is in the growing and harvesting: the land, the long-lived bushes, and packing and harvesting equipment. The fundamentally unitary nature of the fresh and frozen blueberry industry was confirmed by the marketers at the Commission's Hearing:

- According to Mr. Bjorn of Driscoll's, "{I}n a place like the Pacific Northwest, the whole processing market is built into the business."[5] He further explained that in both foreign and domestic regions, product that is not sold fresh is expected to sell as frozen product.[6]
- Mr. Lujan of RAC said that his company is "primarily focused on fresh," but that as the harvest season progresses, growers move to machine harvesting, "elevating the number or the percentage of . . . crops that would go to the freezer."[7]
- Mr. Phillips of Berryhill Foods stated that their growers are "focused on machine harvesting for the processed market. Some of them do dabble with some fresh if they can, but most of the time they'll use the machine harvesting to go into fresh if the quality is good enough."[8]
- Mr. Tentomas of Nature's Touch explained that "{w}e have a choice. We can preserve the product for the entire year . . . We cannot dictate when we're going to get the fresh volume . . . as the season comes in and people look at the economics of picking by hand and going into the fresh market or not."[9]

Although there are growers that concentrate on one or the other segment of the market, many do not, and many produce for both segments. A grower does not necessarily know if a particular berry bush will produce into the fresh market, the frozen market, or both. Growers

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[4] *See also* Response to Question 8, attached as Exhibit 1.

[5] *See* Transcript of Hearing ("Tr.") at 350 (Mr. Bjorn).

[6] *See id.* at 349-50 (Mr. Bjorn).

[7] *See id.* at 400 (Mr. Lugan).

[8] *See id.* at 371 (Mr. Phillips).

[9] *See id.* at 369-70 (Mr. Tentomas).

take the opportunity to produce fresh or frozen blueberries depending on the prevailing agricultural and economic conditions. The questionnaire responses show [ ] growers to produce for both the fresh and frozen markets, with [ ] of [ ] producers reporting financial data with revenue for fresh and frozen product.[10] Growers dedicated to frozen product are limited, largely, to wild blueberry operations. Mr. Shelford, who opposes relief, explained that "there are selected growers that growing for the frozen market exclusively. They're few, they're not the major, but that would be the case."[11]

The facts of this investigation are similar to those in *Lamb Meat*, where the Commission found that fresh lamb meat was like imported frozen lamb meat.[12] The Commission relied on the fact that the lamb meat came from animals in the same genetic subfamily and had substantially identical inherent or intrinsic characteristics. The Commission also pointed to the same end-use of fresh and frozen lamb meat and sales through the same general channels of distribution, *i.e.*, distributors, retailers, and food services. Ultimately, the Commission also found a single domestic industry producing lamb meat consisting of both growers and packers.[13]

Here, as noted above, fresh and frozen blueberries fall within the same genus and subcategory, *Vaccinium Cyanococcus*, which is even more specific than the family-level grouping of the products in *Lamb Meat*. The end uses for fresh and frozen blueberries are nearly identical, with the main difference being the ability to preserve frozen blueberries for longer periods. And like fresh and frozen lamb meat, fresh and frozen blueberries are generally sold to

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[10] *See* Firms with Net Sales of Fresh and Frozen Blueberries, attached hereto as **Exhibit 2**.

[11] *See* Tr. at 373-74 (Mr. Shelford). Testimony at the hearing also indicates that, while growers may start out exclusively producing for one or the other segment, over time, they shift some of their production into the other segment. This is not surprising: the way to maximize revenues and profits in this industry is sell to both segments, as fresh and frozen blueberries in reality are co-products.

[12] *Lamb Meat*, Inv. No. TA-201-68, USITC Pub. 3176 (Apr. 1999) at I-11 – I-12.

[13] *Id.* at I-13.

customers like distributors and retailers. Accordingly, the Commission should find that fresh and frozen blueberries are a single like product produced by a single domestic industry.

III. THE COMMISSION SHOULD ACCOUNT FOR KEY CONDITIONS OF COMPETITION IN THE U.S. MARKET FOR BLUEBERRIES

Several of the key conditions of competition have been established in the information before the Commission and during the course of the Hearing, including the growth in U.S. demand for blueberries, the explosion of supply, and declining prices for both imported and domestic fruit. However, it is critical to understand certain conditions of competition that were discussed at length during the Hearing.

A. Marketers' Economic Interests Drive Blueberry Imports

The Hearing highlighted the role of marketers in this industry and their ability to exert an enormous amount of control over the dynamics of the blueberry market. Mr. Bjorn of Driscoll's was candid that the marketers inform growers on what prices will be, and growers can simply take the price or leave it. He described this dynamic as follows:

> {Y}ou're going to get into situations where maybe the price is falling down below a certain level, and some growers say, well, if the price gets down to that, I no longer want to harvest, okay, or, if the price is going to stay up at this level, well, maybe I can stay in for another week or two. So they make all their business decisions and the day-to-day operations based on the input that we are giving them.[14]

The evidence before the Commission demonstrates that marketers' economic interests, coupled with their control over the market, lead them to favor imports over domestic product. First, the big U.S. marketers like Family Tree and Driscoll's have economic interests in foreign blueberry operations, including through ownership, investment, or exclusivity arrangements for

[14] *See* Tr. at 376-77 (Mr. Bjorn).

proprietary varieties.[15] These marketers are often the importers as well, and presumably take title to foreign fruit as it comes into the United States. They get paid twice for selling foreign blueberries: once on the commission for selling the berries, and again when the sales proceeds go to their foreign growing operation. In contrast, the marketers do not own title to U.S. fruit or have major investments in U.S. growers. Given how invested U.S. marketers are in foreign-produced blueberries, they have to make room in the U.S. market to move that fruit, or they will not be able to recover their investment costs.

Second, marketers generally get a higher commission on sales of foreign fruit. Mr. Bjorn stated that for berries generally, Driscoll's receives at least 15 percent back.[16] In contrast, the commission on sales of U.S. blueberries is typically about [ ] percent.[17]

Third, marketers benefit from additional volumes of sales, as they receive a commission for each sale. Marketers ideally seek high volumes and high prices, but they have more control over volumes.[18] Although marketers dictate prices to growers, supply and demand in the market control the prices that marketers can obtain. Thus, a marketer's interest is to capture as much demand as possible by capturing volumes of sales, as it is easier to increase overall commissions by expanding volume as opposed to moving the entire market on commodity prices.[19]

Fourth, overproduction of blueberries overseas – often by marketer-owned operations – have reduced the incentive for those growers to modulate supply. The importers' argument that

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[15] *See* Responses to Commission Questions, attached hereto as Exhibit 1; "A Split Blueberry Market with Short Supplies for the Next Few Weeks," Fresh Plaza (Mar. 26, 2018), attached hereto as **Exhibit 3** (discussing Family Tree's Mexican operations).

[16] *See* Transcript at 378 (Mr. Bjorn). Mr. Bjorn reported that "on average, worldwide, 85 percent of the revenue we collect from the market goes to the grower." *Id.*

[17] *See* Declaration of Shelly Hartmann, attached hereto as **Exhibit 4**; Declaration of Jayson Scarborough, attached hereto as **Exhibit 5**.

[18] *See* Declaration of Jayson Scarborough, attached hereto as Exhibit 5.

[19] *Id*.

they prioritize price over volume might make sense in a market that is adequately supplied or undersupplied. However, the importers need to bring this production to the United States to recover their costs through sales. Accordingly, marketers' economic interests lie in maximizing volume, particularly in an oversupplied market for a perishable product.

B. Foreign Imports Have Expanded Into The U.S. Shipping Season

Opponents focus on the growth of imports during what they broadly consider to be the U.S. off-season, October through March.[20] However, the U.S. growing season is broader than that and extends from March to October. The shoulder periods are March to April in the spring and August to October in the fall. Frozen product is sold throughout the year.[21]

Opponents to relief have essentially conceded that foreign growers have extended their historic shipping windows in order to seize market share. Mr. Bjorn of Driscoll's explained that

> Mexico has for sure expanded its window of operations, okay, and can today go all the way from – October is probably about the earliest you can really harvest in Mexico and then all {the} way into May.[22]

Ms. Fox, on behalf of Peruvian growers, claimed that Peru entered the industry "in the months when they could produce, and that's what was the pull for their production in that October to December period."[23] However, Peruvian imports in October have increased by 1,836 percent since 2015, and they are entering earlier every year, expanding into September and even August at similarly high rates.[24] In fact, Family Tree Farms prominently announced the beginning of its sales seasons for Peruvian fruit on its social media account on August 10, 2020:

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[20] BCHP Prehearing Brief at 66, Appendix A at 61.

[21] *See, e.g.*, Always Fresh Farms – Blueberries Availability Calendar, attached hereto as **Exhibit 6** (showing the U.S. growing season from March to October). Some U.S. regions can harvest some fruit in February and others can maintain fruit for shipping into November.

[22] Tr. at 360 (Mr. Bjorn).

[23] *Id.* at 362 (Ms. Fox).

[24] ITC DataWeb – Blueberry Imports from Peru, attached hereto as **Exhibit 7**.

Peru blueberry season is here  ***Keep an eye out for them in your local grocery store!***[25]

U.S. blueberry nurseries are developing bushes that can be manipulated to extend their season. For example, [

]**[26]** As a result, foreign growth and harvest periods are likely to continue expanding.

Opponents also claim that U.S. growers in California cannot produce marketable fruit during March, and that this is not part of the shoulder period. Mr. Jackson of Family Tree Farms explained that he tried to produce fruit in California in March, but stopped because "weather won" despite attempts to use crop protection.[27] Although this may have been Mr. Jackson's experience, California grower [ ] has provided a confidential declaration describing the large amount of fruit that can be produced in Southern California from January to June. He explains that production in California in January to March has struggled, but not because of weather – surging imports have forced prices down such that producing fruit in this window became unprofitable.[28] Moreover, a blueberry availability chart published by Driscoll's reflects that California farms can produce fruit all year long.[29]

In sum, U.S. growers produce fresh blueberries from at least March to October and, in some cases, can grow and ship in an extended season depending on weather and shelf-life extension techniques. Any suggestion to the contrary is simply false.

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[25] *See* Family Tree Farms, "Peru blueberry season is here – keep an eye out for them in your local grocery store!," (Aug. 10, 2020), attached hereto as **Exhibit 8**.

[26] *See* [ ], attached hereto as **Exhibit 9**.

[27] *See* Tr. at 398 (Mr. Jackson).

[28] *See* Declaration of [ ], attached hereto as **Exhibit 10**.

[29] *See* Driscoll's Product Guide, 2019 – 2020, attached hereto as **Exhibit 11**.

IV. THE DOMESTIC INDUSTRY HAS SUFFERED SERIOUS INJURY FROM INCREASED IMPORTS

A. The Commission Should Consider All Relevant Factors To Find That The Domestic Industry Has Incurred Serious Injury

The statute is structured to provide the Commission with substantial flexibility and discretion in fulfilling its responsibility to identify serious injury caused by increased imports. In assessing whether serious injury has occurred, the statute directs the Commission to consider "all economic factors which it considers relevant, including (*but not limited to*)" idling of productive facilities, an inability to obtain a reasonable profit, and significant unemployment or underemployment.[30] Thus, the Commission is not limited in any way to the three factors suggested in the statute, but is required to consider *all* economic factors that it deems relevant. This is a wide scope for action, and there are several additional factors relevant to U.S. producers' POI experience that the Commission should consider, including:

- a 14.3 percent decline in operating income;
- a 24 percent (4.0 percentage point) decline in operating margin;
- a 71.0 percent decline in net income;
- a 73 percent (5.1 percentage point) decline in net margin;[31]
- 36.2 and 48.9 percent declines in profitability in the critical spring shoulder months of March and April, respectively;
- 172.1, 85.6, and 89.7 percent declines in profitability in the critical fall shoulder months of August, September, and October, respectively;[32]
- increased frequency of U.S. producers operating at losses, with 39.5 percent reporting net losses in 2015 and 45.7 percent reporting net losses in 2019;[33]
- U.S. producers' 9.1 percent loss of market share to imports, which now supply the majority of the market;[34]
- a 32.4 percent decline in return on assets;[35] and

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[30] 19 U.S.C. § 2252(c)(1)(A) (emphasis added).

[31] Staff Report at Table C-1; The Alliance's Prehearing Brief at 44.

[32] Economic Appendix at Attachment B.

[33] Staff Report at III-33; The Alliance's Prehearing Brief at 44.

[34] Staff Report at Table C-1.

[35] *Id.* at III-34, Table III-24; The Alliance's Prehearing Brief at 55.

- a 36.1 percent decline in capital expenditures.[36]

Blueberry farms are multi-year assets that are planned years in advance and operated over decades, so the Staff Report data for production, income, and labor for the domestic industry reflect this lag. In addition, industry income figures are overstated because most farmers keep their books on a cash basis, expensing the costs of start-up blueberry fields when they were incurred years ago rather than over time. Moreover, due to blueberry farmers' tendency to report financial information on a tax basis, operating income figures in the Staff Report are not probative of the domestic industry's experience. Rather, net income is a better indicator of the serious injury suffered by domestic producers.

Despite the overwhelming evidence of injury, opponents contend that the Commission cannot find injury here because the domestic industry was marginally profitable in 2019, reaching its lowest level of profitability in the last five years. However, as discussed in more detail in Exhibit 1 attached hereto, the statute governing Section 201 identifies one factor for consideration as whether firms in the domestic industry can carry out operations "at a reasonable level of profit." This very language contemplates the idea that an injured industry can be profitable at a level that is not reasonable and thus is injurious. Accordingly, and in addition to the many factors showing injury set out above, the Commission should accept the decline in operating and net income of U.S. growers as evidence of serious injury.[37]

B. Growers Have Been Forced To Leave Fruit On The Bush

There was some discussion in the Hearing regarding U.S. growers' experience in leaving fruit unharvested due to price pressure from imports.[38] Mr. Lujan strenuously denied that

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[36] Staff Report at III-34, Table III-24 ((58,173 – 37,157) / 58,173 = 0.361 = 36.1 percent).

[37] This conclusion is consistent with the Commission's decisions in earlier Section 201 investigations. *See* Response to Question 17, attached as Exhibit 1.

[38] *See* Tr. at 99 (Mr. Eisele) ("Now that the frozen prices can be lower {than} our costs of production, we leave the fruit in the field to rot"); The Alliance's Prehearing Brief at Exhibit 1, Declaration of [ ];

growers would ever leave fruit on the bush.[39] However, Mr. Bjorn explicitly contradicted this testimony, explaining that with respect to most farmers who market with Driscoll's, "they really have two options . . . {o}ne is don't harvest . . . {t}hey can't cover their variable costs of getting the crop out, and they may just finish the season."[40] Mr. Lujan eventually conceded that U.S. growers would not leave fruit on the bush "on purpose."[41] This is actually the key point on this issue – farmers are being forced to leave fruit on the bush because they cannot afford to harvest at the low prices generated by overabundant supplies of imported blueberries.

V. INCREASED IMPORTS THREATEN SERIOUS INJURY TO U.S. GROWERS

The record contains ample evidence showing that increased imports pose a threat of serious injury to the domestic injury. This is based on many factors, including the export orientation of the major source countries, the huge increase in shipments of young plants to these markets, an expectation that U.S. demand will remain high and continue to grow, and the vulnerable state of the U.S. domestic industry. Opponents of relief have provided no evidence in rebuttal, although they have claimed that (1) shipments of new plants have nothing do with expanding production, and (2) they intend to grow for export to other markets. Neither contention has any merit.

The increasingly large amounts of young plants shipped abroad will undoubtedly increase production.[42] Mr. Jackson of Family Tree described these new plants as a way to "increase density."[43] However, increasing density is not about maintaining production – it is about

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[39] *See* Tr. at 401 (Mr. Lujan).

[40] Tr. at 380 (Mr. Bjorn).

[41] *See id.* at 401 (Mr. Lujan).

[42] A fundamental assumption of Dr. Prusa's econometric analysis is that U.S. imports increase as a result of expanded acreage and yield in foreign countries. Prusa Report at 56.

[43] Tr. at 366 (Mr. Jackson).

increasing it. Indeed, because the amount of young plants sent abroad has been increasing every year, it is clear that they are not just for replacement, but are to increase production. This is particularly true for plants sent to Mexico and Peru, where many blueberry fields are new.

It is also evident that source countries will remain export-oriented. The United States continues to be the top consumer of blueberries in the world, and demand here is increasing. If the Commission reaches the threat analysis, the starting point should be the historic export patterns of the foreign producers.[44] These patterns reflect established customer relationships and logistics infrastructure. Further, foreign producers reported that they will increase their exports to the United States over the next year[45] and are taking concrete steps to achieve this goal. For example, just two months ago, new cold treatment facilities were completed at the California port of Hueneme, "a move that will allow it to bring in blueberries from Peru. . . . The blueberries will be imported from Peru's Callao and Paita ports."[46] Foreign producers' intent to continue flooding this market is clear.

VI. INCREASED BLUEBERRY IMPORTS ARE A SUBSTANTIAL CAUSE OF SERIOUS INJURY TO THE DOMESTIC INDUSTRY

The statute identifies two examples of factors to consider when examining whether an increase in imports was a substantial cause of injury to the domestic industry: an increase in imports and a decline in domestic producers' market share.[47] There is no question that in this investigation, both of these factors demonstrate causation. Imports of blueberries increased absolutely by 61.7 percent over the POI and domestic producers' market share decreased by 9.0

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[44] *See, e.g., CSPVs* at 39, 43 (finding serious injury due in part to historic export orientation of foreign CSPV module producers).

[45] *See* Staff Report at IV-29 – IV-75; The Alliance's Prehearing Brief at 64-65, Table 9.

[46] "Port of Hueneme Secures On-Dock Cold Treatment in 'Game Changer' for Blueberries," FreshFruitPortal.com (Nov. 13, 2020), attached hereto as **Exhibit 12**.

[47] 19 U.S.C. § 2252(c)(1)(C).

percentage points over that same period.[48] This leads to the conclusion that increased imports are a substantial cause of serious injury to the domestic industry. However, additional factors also demonstrate this causal relationship between imports and serious injury.

A. Imports Drove Annual And Seasonal Price Declines For Blueberries

U.S. producers sustained injury because prices for blueberries declined over the POI, particularly during the critical shoulder periods when growers typically make higher profits. Costs remained relatively stable over the POI, but falling prices squeezed U.S. growers' operating and net income margins, as well as many other indicators such as declining returns on assets and capital expenditures. The price declines at the core of this injury were caused by increased imports. In the Economic Appendix attached hereto, the Alliance provides a statistical analysis demonstrating that import volumes negatively impacted U.S. prices for blueberries during the POI. A few key points from this analysis are:

- Monthly data show an inverse relationship between import market share and U.S. prices between 2015 and 2019. Specifically, there is a statistically significant correlation between import market share gains and domestic price declines.
- For example, April saw a 12.4 percentage point increase in import market share and a 21 percent decline in U.S. prices; September saw a 21.4 percentage point increase in import market share and a 42 percent decline in U.S. prices.
- Import prices also dropped during these windows, and there is a strong statistical correlation between U.S. prices and import prices. From 2015 to 2019, import prices – based on the same data as U.S. prices – declined by 7 percent in March, 15 percent in April, 28 percent in August, 37 percent in September, and by 51 percent in October.
- The same relationship between imports and prices is evident in weekly data.[49] Notably, this analysis covers the entire U.S. growing season, March to October, and is not solely focused on the shoulder periods.
- These price and volume trends suppressed the revenues earned by U.S. growers, which grew at meager rates despite the significant increase in U.S. demand over the POI. The revenue earned by domestic growers during the shoulder periods was not commensurate with the growth in overall U.S. market value.

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[48] Staff Report at II-3 and Table C-1.

[49] *See* Economic Appendix at 3, Figure 1.

- For example, from 2015 to 2019, where U.S. market value during September increased by 96 percent, domestic revenue increased by only nine percent.

This inverse correlation between import volumes and U.S. prices has long been apparent to U.S. blueberry market participants and is encapsulated by the headline of last week's article in Blueberries Consulting Magazine: "Peru Blueberry Exports 2020: Record Low Price and Record Volume."[50] In light of enormous import volumes and resulting price drop, the article's analysis drew this straightforward conclusion: "Naturally, the decrease in the average export price led to a reduction in the profitability of the blueberry business for growers."[51]

Nor is this problem new to the industry. At the 2018 Oregon Blueberry Conference, agriculture consultant Rod Cook "explain{ed} the price increase that didn't happen."[52] Specifically, growers anticipated improved prices in 2017, but this was never realized because "increased competition from Chile, Mexico, and Peru is having a negative effect on price."[53] Mr. Cook also noted that "Canada, which typically doesn't ship substantial quantity to the U.S., did so last year," resulting in a "fear of low prices."[54] Simply put, increased imports are the most important cause of injury to U.S. growers.

B. There Are No Factors Greater Than Imports That Caused Injury

1. Quality does not account for the harm to the domestic industry

Opponents of relief argue that any injury to blueberry farmers is partially attributable to the high quality of imported blueberries relative to domestic product.[55] They claim that any

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[50] "Peru Blueberry Exports 2020: Record Low Price and Record Volume," Blueberries Consulting Magazine (Jan. 13, 2021), attached hereto as **Exhibit 13**.

[51] *Id*.

[52] "Market Expert Explains the Price Increase that Didn't Happen," Blueberry Update (Spring 2018), attached hereto as **Exhibit 14.**

[53] *Id*.

[54] *Id*.

[55] *See, e.g.*, BCPH's Prehearing Brief at 5 ("{I}mports are not purchased on the basis of price but rather based on quality and availability. U.S. purchasers also confirm that Peru's blueberries are superior quality.").

purchasers prioritize quality above all else and that price is not an important factor in purchaser behavior.[56] However, virtually all purchasers reported that in the absence of import surges, U.S. growers would obtain higher prices.[57] This makes sense, given that a perishable commodity product like fresh blueberries must quickly be sold at the supply-driven market clearing price. If the supposed superior quality of imported fruit were truly the main driver of prices as claimed, then one would not expect domestic prices to increase if the import supply were limited.

In any event, nearly all reported that domestic and foreign blueberries are comparable to each other with respect to quality meeting or exceeding industry standards, as well as indicators such as color, firmness, flavor, lack of bruising, and freshness.[58] In fact, over a third of responding purchasers said that U.S. blueberries were *superior* to imported product in terms of freshness.[59] Therefore, to the extent quality is a major factor for U.S. purchasers, they themselves admit that U.S. blueberries are comparable or superior to imported product. Thus, supposed differences in quality cannot account for the injury sustained by U.S. growers.[60]

2. Domestic production did not injure the domestic industry

Competition among domestic producers does not account for the injury to U.S. growers, despite opponents' claim to the contrary. As described in detail in Exhibit 1 attached hereto, reporting West Coast growers in Oregon, Washington, and California [ ] ship to regions west of the Rockies. Destination-specific data from California show the same pattern, with the majority of blueberry production going to California, Washington, and Oregon. Moreover, the Economic Appendix provides extensive data showing that increases in import supply accounted

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[56] *See, e.g.*, *id.*; Government of Peru and Pro Arandanos' Prehearing Brief at 41.

[57] Staff Report at V-58.

[58] *Id.* at V-20 – V-21.

[59] *Id.* at V-20. *See also* Declaration of [ ], attached hereto as Exhibit 10.

[60] *See also* Response to Question 6, attached as Exhibit 1.

for the vast majority of overall increased supply during the shoulder periods, which means that the relative price declines during those periods cannot be attributed to the much smaller increases in domestic production.

VII. THE COMMISSION SHOULD MAKE AFFIRMATIVE INJURY FINDINGS WITH RESPECT TO THE USMCA COUNTRIES AND PERU

The record is unambiguous with respect to the negative impact that imports from Canada, Mexico, and Peru have had on the state of the domestic industry. All three countries have been among the top five source countries of imports for the last three years, and imports from all three countries grew significantly over the POI. Under the applicable law, the Commission should make an affirmative finding with respect to all three countries. The Alliance provides further analysis on this point in Exhibit 1 in response to the Commission's questions on Canadian imports.

VIII. CONCLUSION

For the foregoing reasons, the Commission should determine that increased imports of blueberries are a substantial cause of serious injury, and threat thereof, to the domestic industry.

Respectfully submitted,

/s/ Stephen J. Orava
Stephen J. Orava
Bradford L. Ward
Jamieson L. Greer
Bonnie B. Byers, Consultant

KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 737-0500

Counsel for the American Blueberry Growers Association

Economic Appendix

Analysis of Serious Injury and Causation Within Seasons, Months, and Weeks

in the matter of

Fresh, Chilled, or Frozen Blueberries

Investigation No. 201-TA-077 (Injury)

Before the United States International Trade Commission
Washington, DC

January 19, 2021

Submitted By

Travis Pope

Charles Anderson

Andrew Szamosszegi

Capital Trade, Inc.

tpope@ captrade.com

canderson@captrade.com

aszamosszegi@captrade.com

on behalf of the

American Blueberry Growers Alliance

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I. Introduction and Summary

The following section is a consolidated response to Commissioners' questions regarding the impact of imports on the volume, market share, prices, revenues, and profits of U.S. growers of fresh cultivated blueberries over the POI and, in particular, the impact at different points in the year. The attached data and analysis demonstrate the following conclusions.[1]

First, the spring shoulder (March) and fall shoulder (August-October) periods are of critical importance to the domestic industry, accounting for 28.8 percent of annual volume and 37.1 percent of annual revenue from 2015 to 2019.[2] These periods are critical to growers' financials. Prices have traditionally been higher during the shoulder periods, meaning that these periods contribute disproportionately to domestic revenues and profits.[3]

Second, import volume grew dramatically during the shoulder periods, increasing by 90 percent in the spring shoulder from 2015 to 2019 and 174 percent in the fall shoulder.[4] These

[1] Data sources and compilation methodology are explained in detail in Attachment D: Data Explanation. The primary source data are the weekly Movement (volume) and Shipping Point (price) datasets from the USDA Agricultural Marketing Service (AMS), as reported by Agronometrics. (Attached at Attachment E) These datasets were merged at the most granular level possible (weekly by country of origin and U.S. geographies) and volumes were scaled based on the Commission's data: U.S. growers' volumes were scaled to match U.S. shipments of fresh cultivated blueberries at the annual level (Staff Report Table IV-3) and import volumes were scaled to match the official import statistics for fresh cultivated blueberries (HTS commodities 0810.40.0026 and 0810.40.0029) at the country/month level and further adjusted to deduct net exports. These datasets were aggregated at the weekly level to national U.S. shipments and aggregate imports. As Shipping Point price data are not exhaustive, at each point of aggregation, prices were weighted by the volume of corresponding shipments with available price data. The resulting weekly dataset is provided at Attachment B and these data were then aggregated to the monthly level, provided at Attachment A. The seasonal analysis is based directly on the monthly dataset, where March and April are grouped in the "Spring Shoulder" period and August, September, and October, are classified as the "Fall Shoulder" period.

[2] Attachment A: Monthly Volume, Price, and Revenue Dataset.

[3] Attachments A and B.

[4] Attachment A.

increases far outpaced market growth, resulting in imports capturing 9.7 percentage points of market share during the shoulder periods from 2015 to 2019.[5]

Third, the increasing volume and market share of imports resulted in significant declines in U.S. prices. From 2015 to 2019, U.S. prices in the shoulder months declined by an average of 33.5 percent.[6] Price declines were particularly acute in the months with the largest increases in import market share. In April, import market share increased from 26.5 percent in 2015 to 38.9 percent in 2019, an increase of 12.4 percentage points of market share, while prices declined 20.8 percent. In September, import market share increased from 30.6 percent in 2015 to 52 percent in 2019, an increase of 21.4 percentage points of market share, while prices declined 42.3 percent.[7]

Fourth, declining prices resulted in suppressed revenues and declining profits for U.S. growers. Revenues declined while costs were stable on a per-unit basis, resulting in significant decline in operating and net income earned during the shoulder periods. For example, from 2015 to 2019, net income per unit declined by 48.9 percent in April and by 85.6 percent in September.[8]

These seasonal trends are summarized in a comparison of 2015 and 2019 volume and price of domestic and import shipments.[9] The figure captures in one illustration the dynamics

[5] Attachment A.

[6] Attachment A. Reflects the simple average of percent changes in the five months.

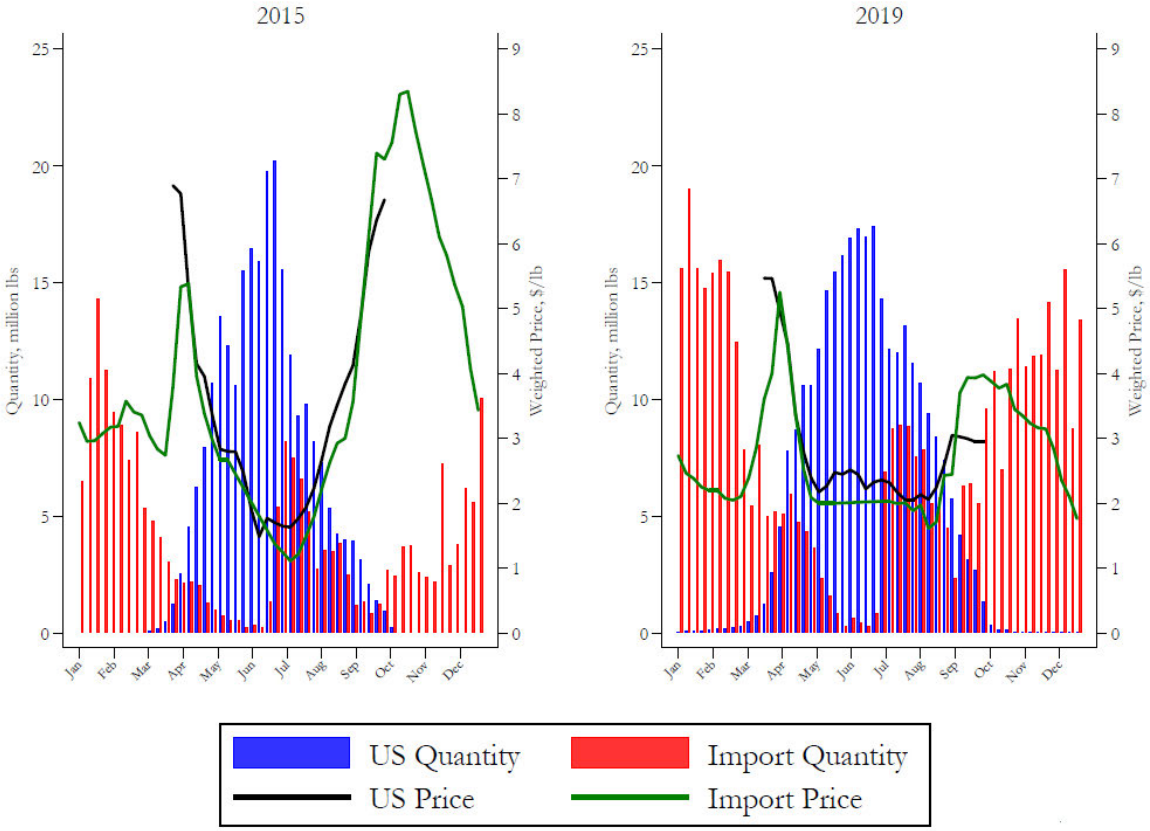
[7] Attachment A.

[8] Attachment B: Monthly Profit Analysis. As explained in the attachment, U.S. growers' net sales value and costs were allocated by a month's share of annual volume and revenue. Unit costs were applied uniformly across the months in order to calculate operating and net profits on a per unit basis and as a percent of net sales. Financial data are based on the domestic industry in aggregate.

[9] This figure is a replication of ABGA's Hearing slide 24 that addresses questions raised by Commissioner Schmidtelin regarding the scale of the price axis (Tr., at 221) and Commissioner Karpel regarding monthly labels. (Tr. at 231) Note that this figure also addresses Dr. Prusa's criticism that the U.S. shipments were not scaled to

behind the decline in the U.S. fresh cultivated blueberry industry over the POI; namely, the dramatic increase in imports during the shoulder period since 2015 and the resulting declines in prices of both domestic and import shipments.

Figure 1: Weekly Volume and Price of Domestic and Import Shipments[10]



Fifth, there is no question that imports were the overwhelming cause of these declines in U.S. growers' prices and other financial performance indicators. Prices are strongly correlated between U.S. and import sources, POI-wide changes in prices are strongly correlated between

match the Commission's record while imports were scaled. (Tr., at 335) As can be seen in comparison with the slide from the hearing, Dr. Prusa's suggested revision does not change the conclusions.

[10] USDA AMS Movement and Volume datasets, via Agronometrics (weekly). See Attachment C: Weekly Volume and Price Dataset. As explained in Attachment D, the volumes are scaled to match annual and monthly volumes in the Commission's record based on Staff Report Table IV-3 (U.S. annual volume and annual re-exports of imports) and the official import statistics for fresh cultivated blueberries.

domestic and import sources, and import market share is negatively correlated with U.S. prices over the POI and within weeks of the year. At the weekly level, U.S. prices and import prices demonstrated a strong and statistically significant correlation.[11] Further, 2015-2019 changes in weekly prices are strongly correlated: the percent changes in U.S. prices and import prices demonstrate a coefficient of correlation of 0.953, which is statistically significant for the 28 weeks which can be compared between 2015 and 2019. The effect of import market share gains is also strongly related to U.S. prices. Comparing changes from 2015 to 2019, import market share changes and U.S. price changes demonstrate a statistically significant inverse relationship. That is, weeks of the year that demonstrate significant increases in import market share also demonstrate significant declines in U.S. prices. Note that each of these relationships demonstrating injury are significant throughout the periods of overlapping domestic and import shipments, and over the course of the POI – they are not just limited to the shoulder periods.

Finally, the injurious effects of imports are visible at any level of specificity with respect to seasons, months, and weeks of the year. Attachments A, B, and C assess the effect of imports at multiple levels of seasonal granularity. Further, these conclusions are robust no matter how broadly or narrowly the U.S. season is defined. The Coalition has sought to draw an extremely narrow definition of the U.S. growing season, seeking to exclude periods of the year with significant volumes and even larger revenues.[12] Contrary to the Coalition's approach, the attached analysis demonstrates that the injurious effects of imports are apparent no matter how broadly one defines the U.S. season.

[11] Attachment C: Weekly Volume and Price Dataset. The coefficient of correlation is -0.903 which is statistically significant over the 132 weekly observations with overlapping price data.

[12] BCHP Prehearing Brief at 66, Prusa Report at 45-46.

II. Import Volume and Serious Injury[13]

The Staff Report clearly demonstrates the *annual* growth in import volume and market share over the POI. In the context of the seasonal and highly perishable nature of fresh cultivated blueberries, the key fact is the growth in import volume and market share in the "shoulder" periods: March-April (the spring shoulder) and August-October (the fall shoulder), periods of critical importance to the domestic industry.[14]

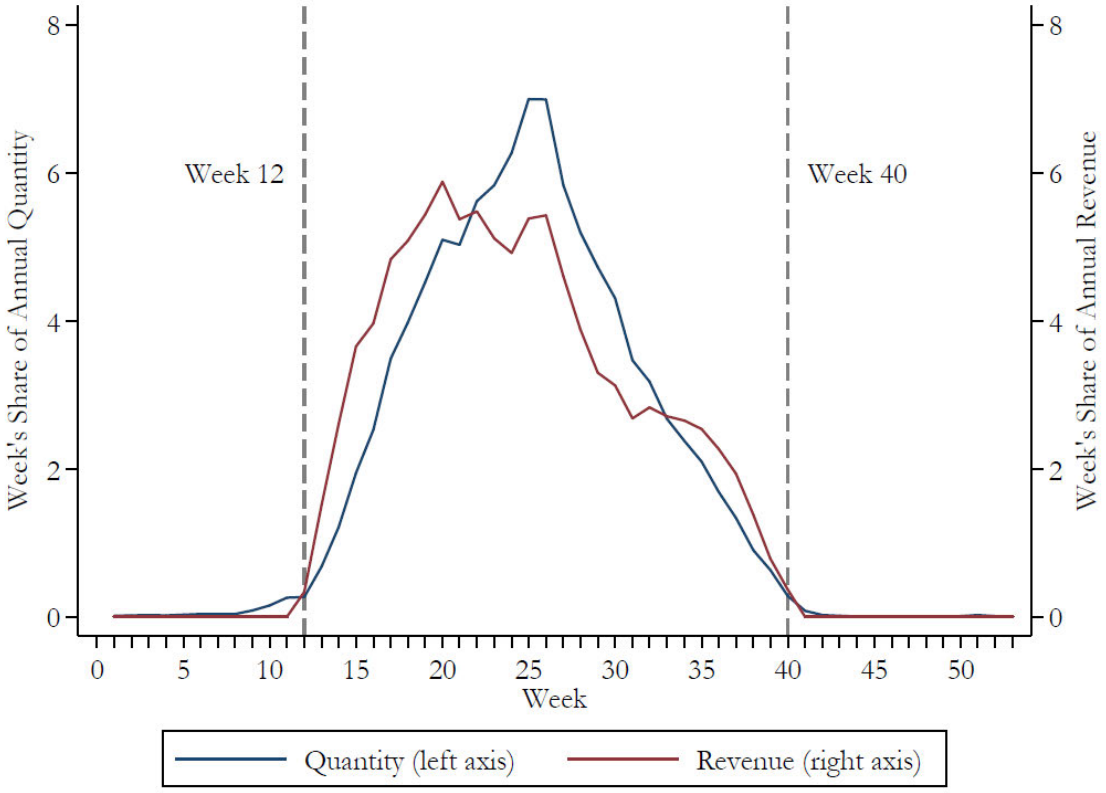
Respondents have sought to draw an excessively narrow definition of the shoulders - based on "phases" defined by Dr. Prusa – and claimed that the spring and fall phases account for only nine percent of domestic volume over the year.[15] Their classification seeks to obscure the fact that the months before and after the U.S. peak season account for a significant share of domestic volume and a disproportionately large share of domestic revenue.

[13] This section addresses the following questions from Commissioners: Karpel: Tr. at 193, 195, and 255; Schmidtlein: Tr. at 224, 225, and 253.

[14] Attachments A and C provide domestic and import volume and price data on a weekly basis, a monthly basis, and divided into seasons (Spring Shoulder, Peak, Fall Shoulder, and Other Periods). For purposes of responding to Commissioner questions, the shoulders are assigned on a monthly basis as described above. However, the granular weekly data allow for alternative classifications of seasons, all of which demonstrate the injury to the domestic industry, particularly in the key periods on either side of the peak season, when volumes are significant and prices have historically been highest.

[15] BCHP Prehearing Brief at 66, Prusa Report at 45-46.

Figure 2: Week's Share of Annual Quantity & Revenue, Combined 2015-2019[16]



Over the full years of the POI, the March-April shoulder period accounted for 10.1 percent of domestic quantity and 16.9 percent of domestic revenue.[17] The August-October period accounted for 18.8 percent of domestic quantity and 20.2 percent of domestic revenue.[18] Combined, these five months outside the domestic peak season accounted for 28.8 percent of domestic quantity and 37.1 percent of domestic revenue.[19]

A persistent pattern in the data is that the shoulder periods are disproportionately important to domestic revenue. Historically, this has been due to the high prices earned in the

[16] Attachment C. Week 12 is the week ending between March 22 and March 27; Week 40 is the week ending between October 4 and October 9. In total, the Week 12-40 period accounts for 99.1 percent of domestic quantity.

[17] Attachment A. See sheet 'Seasonal and Monthly Share of Domestic Volume and Revenue.'

[18] Attachment A. See sheet 'Seasonal and Monthly Share of Domestic Volume and Revenue.'

[19] Attachment A. See sheet 'Seasonal and Monthly Share of Domestic Volume and Revenue.'

shoulders. For example, in 2015, March prices were four times greater than June prices on a per-pound basis and October prices were 3.9 times greater than June prices.[20] This is not only true at the outer edges of the shoulders: April prices were 2.7 times higher than June prices; September pries were 2.9 times higher than June prices.[21] These high prices were earned in a period with significant volume and thus contributed significantly to the revenue and profitability of the domestic industry.

It was these high prices that inspired importers to aggressively move into the shoulder periods of the U.S. market, as import volume and market share increased dramatically during the shoulders. In the spring shoulder, from 2015 to 2019, imports during March increased by 61 percent, April imports increased by 162 percent, August imports increased by 67 percent, September imports increased by 440 percent, and October imports increased by 212 percent.[22] In terms of seasons, imports during the spring shoulder increased by 90 percent and imports during the fall shoulder increased by 174 percent.[23] Combined, spring and fall shoulder imports increased by 136 percent from 2015 to 2019.

These increases far outpaced growth in the U.S. market. During the fall shoulder, import market share increased from 44.9 percent in 2015 to 58.3 percent in 2019, an increase of 13.3 percentage points of market share.[24] In particular, import market share during September increased by 21.4 percentage points.[25] That is, where imports accounted for less than a third of the U.S. market during September in 2015, they were a majority of the market in 2019. During

[20] Attachment A. See sheet 'Summary of Monthly Trends.'

[21] Attachment A. See sheet 'Summary of Monthly Trends.'

[22] Attachment A. See sheet 'Summary of Monthly Trends.'

[23] Attachment A. See sheet 'Summary of Season Trends.'

[24] Attachment A. See sheet 'Summary of Season Trends.'

[25] Attachment A. See sheet 'Summary of Monthly Trends.'

the spring shoulder, import market share increased from 53.9 percent in 2015 to 58.3 percent in 2019, an increase of 4.4 percentage points.[26] In particular, import market share during April increased by 12.4 percentage points.[27]

In summary, the shoulder periods of critical importance to the sustainable operations of the domestic blueberry industry experienced a dramatic increase in import volume and market share over the POI.

III. Price Effects of Imports during the U.S. Harvest[28]

As imports surged over the POI during the shoulder periods, U.S. prices also declined dramatically. From 2015 to 2019, U.S. prices declined by 21 percent in March, declined by 21 percent in April, declined by 28 percent in August, declined by 42 percent in September, and by 56 percent in October.[29] These price declines are also evident in the weekly data.[30]

Likewise, and unsurprisingly for a perishable commodity product such as blueberries, the price of imports also declined significant during these months from 2015 to 2019.[31] From 2015 to 2019, import prices – based on the same data as U.S. prices - declined by 7 percent in March,

[26] Attachment A. See sheet 'Summary of Season Trends.'

[27] Attachment A. See sheet 'Summary of Monthly Trends.'

[28] This section responds to the following questions from Commissioners: Karpel: Tr. at 151-152, 153, 153-154, 156, 157, and 231; Schmidtlein: Tr. at 222-223.

[29] Attachment A: See sheet 'Summary of Monthly Trends.' Prices reflect weekly U.S. Shipping Point data via Agronometrics, which reports aggregate prices on a per-pound basis by type (organic or conventional) and source (U.S. states or countries). Prices were weight-averaged based on the volume of shipments in the Movement data at the most granular level available. See explanation of data sources and compilation in Attachment D.

[30] Attachment C: Weekly.

[31] Attachment A: See sheet 'Summary of Monthly Trends.'

declined by 15 percent in April, declined by 28 percent in August, declined by 37 percent in September, and by 51 percent in October.[32]

These price declines are also evident in the Commission's monthly pricing product data which are also based on the AMS Shipping Point price data series.[33] The advantage of this data source is that prices are reported by product, demonstrating that there are no changes in product mix that affect the conclusion that prices declined significantly over the POI.[34] For example, from 2015 to 2019, U.S. growers' prices for Product 1 (fresh conventional flats in 12 6-oz cups with lids) declined by 19 percent in March, declined by 6 percent in April, declined by 25 percent in August, and declined by 45 percent in September.[35]

Thus, all of the record data demonstrate significant price declines in the shoulder periods over the POI, as imports grew dramatically in terms of both volume and market share. These price and volume trends suppressed the revenues earned by U.S. growers, which grew at meager rates despite the significant increase in U.S. demand over the POI. The revenue earned by domestic growers during the shoulder periods were not commensurate with the growth in overall U.S. market value. For example, where the value of all U.S. market sales (domestic and import) during April increased by 61 percent from 2015 to 2019, domestic revenue increased by only 16 percent; where U.S. market value during September increased by 96 percent, domestic revenue

[32] Attachment A: See sheet 'Summary of Monthly Trends.'

[33] Where the Commission reports data *by product*, directly from the AMS Shipping Point data series, the prices within this report rely on Agronometrics which converts all products to a dollar-per-pound basis in order to aggregate across all product types reported by AMS.

[34] Staff Report Tables V-16-19.

[35] Included with ABGA's posthearing brief is an analysis of U.S. Grower Price Trends by Pricing Product. (No price was reported for October 2019.) Note that monthly prices may differ somewhat between the monthly price dataset in Attachment A and the Commission's pricing data because the latter reflects a simple average of all prices available in a month (Staff Report at V-29) while Attachment A presents the monthly volume-weighted average of weekly prices. As both data sources demonstrate comparable price trends over the POI, it is clear that simple averages in the pricing product data are broadly representative of monthly prices.

increased by only nine percent. These revenue effects are the direct result of lower domestic market share and lower prices caused by the imports. Further, as unit costs were relatively stable over the POI,[36] these revenue effects fed directly into the bottom line of U.S. growers, resulting in lower profitability in terms of both operating and net income.

Finally, there is a tight relationship between domestic and import prices, as would be expected of a perishable commodity product. Attachment C provides the weekly U.S. price and import price over the POI, allowing for 132 weekly observations with overlapping data. The coefficient of correlation between these two series is 0.903 which is statistically significant at any level of confidence.[37] Further, the POI trends of these series are also strongly correlated. Comparing the percent change in weekly prices from 2015 to 2019, the correlation between U.S. and import trends is 0.953 which is statistically significant for the 28 available comparisons.[38] In other words, domestic and import prices are correlated in terms of levels and correlated in terms of POI trends. Respondents attempt to distract the Commission from this clear relationship because it demonstrates the price mechanism through which increased import volumes injure the domestic industry.

Regarding Commissioner Karpel's question about the effect of imports on prices later in the year, as testified at the hearing, the starting prices in the spring shoulder season are a "high water mark" for early/mid-season growers. As the season develops and volume harvested increases, prices decline from that high water mark. As shown in the following table, the rate of decline is fairly uniform from year to year.

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[36] Staff Report Tables III-16 (all blueberries) and III-18 (fresh blueberries). Unit operating expenses of all U.S. producers were generally flat, declining by two cents per pound from 2015 to 2019, or 1.3 percent. Unit operating expenses of fresh blueberry producers increased by 17 cents per pound, a 10 percent increase.

[37] Attachment C. See sheet Correlation Analysis.

[38] Attachment C. See sheet Correlation Analysis.

Table 1: Spring Decline in U.S. Price, Weeks 13-17, 2015-2019[39]

	$/pound		
	Week 13	**Week 17**	**% Change**
2015	$6.89	$3.95	-42.7%
2016	n/a	n/a	n/a
2017	$6.78	$3.43	-49.4%
2018	$5.97	$3.67	-38.5%
2019	$5.46	$2.79	-48.9%

Since the rate of decline is fairly uniform from year to year in the spring, the lower price has a ripple effect through the spring shoulder period.[40] Later in the season, during peak season, prices respond more directly to supply and demand balances. While the primary factors affecting U.S. prices are the supply and demand conditions at that time, there is substantial evidence that actual and expected volumes of imports during these transition periods place downward pressure on prices that persists until U.S. volume begins to be the major driver in the market.

IV. Causation within Weeks, Months and Seasons[41]

As discussed above, the record is unequivocal that (1) import volume and market share grew dramatically over the POI during the shoulder periods and (2) prices declined during the shoulder periods. In terms of causation, the data speak for themselves: the imports captured an

[39] Attachment C.

[40] The weekly data in Attachment C demonstrate that the relative price change over the course of the spring (from week 13 to week 17) was relatively constant over the POI. That is, the starting point prices declined from year to year, but the rate of decline was fairly constant within each period. (The week 13 to week 17 price decline ranged from 38.6 percent to 49.4 percent.)

[41] This section addresses the following questions from Commissioners: Karpel: Tr. at 157-158, 227-228, 231; Stayin: Tr. at 168; Kearns: Tr. at 196-198, 200-201; Schmidtlein: Tr. at 221, 226-227.

increasing share of the U.S. market during the critical shoulder periods, causing significant price declines that led directly to suppressed revenues and lower profits for the domestic industry. The effects of growing import volume and market share on domestic prices, revenue, and profit are evident at the weekly, monthly, and seasonal levels.

At the seasonal and monthly levels, **Table 2** summarizes the inverse relationship between import market share and U.S. prices, comparing 2015-2019 changes for each period. There is a direct correlation between import market share gains and domestic price declines. In particular, April saw a 12.4 percentage point increase in import market share and a 21 percent decline in U.S. prices; September saw a 21.4 percentage point increase in import market share and a 42 percent decline in U.S. prices.

Table 2: Changes in Import Market Share & U.S. Prices, 2015 to 2019[42]

	percentage point change **Import Market Share**	*percent change* **Domestic Weighted Price**
Spring Shoulder	***4.4%***	***-18.5%***
March	-5.3%	-20.8%
April	12.4%	-20.8%
Fall Shoulder	***13.3%***	***-32.4%***
August	4.4%	-27.7%
September	21.4%	-42.3%
October	3.7%	-55.8%
Combined Shoulders	***9.7%***	***-26.4%***

This correlation is robustly demonstrated with weekly comparisons, as provided in Attachment C. Weeks of the year, as classified by AMS and Agronometrics, are compared between 2015 and 2019, based on the percentage point increase in import market share and the

[42] Attachment A. The table finds only one counter-example to inverse relationship between import market share and U.S. prices in March. In fact, as shown in weekly dataset in Attachment C, even this one monthly instance is a result of a mismatch between weeks within March with reported data. The more granular level demonstrates that in Week 13, the only month with complete USDA reporting in both years and accounting for the large majority of domestic volume in both years, import market share increased by 2.5 percentage points while U.S. prices declined by 20.7 percent.

percent decline in U.S. prices. The coefficient of correlation is -0.57 which is statistically significant over the 28 week/year observations.[43] Note that this statistical analysis includes all weeks of the year with overlapping data (March through October) – not only the shoulder periods.

The Commission should note that this correlation differs from that which the Coalition prefers to discuss. The Coalition's arguments focus on the correlation between volume and price *within a given year* and does not consider the relationship over the years of the POI. This is not the way the Commission assesses injury trends and makes no sense for assessing the impact of imports on a perishable agricultural product. The correct approach is to assess prices and market share at a particular month, week, or season and compare the trends over the years of the POI. This is the approach taken above and demonstrates a powerful correlation between growing import volume and market share and declining U.S. prices.[44]

[43] Attachment C. See sheet Correlation Analysis: Effect of Import, 2015-2019 Changes. The *t statistic*, a conventional measure of statistical significance, is -3.53 which is statistically significant at the 99 percent confidence level.

[44] See also ABGA Slide 20.

V. Attachments

Attachment A:	Summary of Season Trends
Attachment B:	Monthly Profit Calculation
Attachment C:	Weekly Volume and Price Datasets
Attachment D:	Explanation of Data Sources and Compilation in the Monthly and Weekly Dataset
Attachment E:	Agronometrics Dataset

Attachment A

Summary of Season Trends

Spring Shoulder: March-April; Peak: May-July; Fall Shoulder: August-October

Domestic Volume (pounds)

						Jan-Oct	*% Change*	
Season	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**
Spring Shoulder	23,236,983	6,540,769	31,970,326	31,065,293	36,931,832	26,265,502	59%	13%
Peak	181,412,696	202,479,464	162,596,181	177,484,149	189,104,658	158,138,506	4%	-13%
Fall Shoulder	40,688,317	36,556,754	50,514,598	48,608,338	65,109,452	51,840,046	60%	27%
Other Months	0	0	370,885	1,905,239	1,174,067	n/a	n/a	n/a
Annual Total	245,337,996	245,576,987	245,451,991	259,063,020	292,320,010	n/a	19%	
Shoulders	63,925,300	43,097,523	82,484,924	79,673,632	102,041,284	78,105,548	60%	22%

Implied Domestic Revenue ($)

						Jan-Oct	*% Change*	
Season	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**
Spring Shoulder	111,983,069	46,035,300	159,059,516	136,775,984	144,975,223	87,131,782	29%	-22%
Peak	381,046,013	460,770,568	461,487,848	480,285,336	440,103,430	415,273,042	15%	9%
Fall Shoulder	145,097,524	120,793,241	155,691,043	134,097,297	156,952,762	131,595,141	8%	-9%
Other Months	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Annual Total	638,126,606	627,599,109	776,238,407	751,158,617	742,031,414	633,999,965	16%	
Shoulders	257,080,593	166,828,541	314,750,559	270,873,281	301,927,984	218,726,923	17%	-15%

Domestic Weighted Price ($/lb)

						Jan-Oct	*% Change*	
Season	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**
Spring Shoulder	$4.82	$7.04	$4.98	$4.40	$3.93	$3.32	-19%	-31%
Peak	$2.10	$2.28	$2.84	$2.71	$2.33	$2.63	11%	25%
Fall Shoulder	$3.57	$3.30	$3.08	$2.76	$2.41	$2.54	-32%	-29%
Other Months	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Annual Total	$2.60	$2.56	$3.16	$2.90	$2.54	n/a	-2%	n/a
Shoulders	$4.02	$3.87	$3.82	$3.40	$2.96	$2.80	-26%	-30%

Import Volume (pounds)

						Jan-Oct	*% Change*	
Season	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**
Spring Shoulder	27,222,158	29,519,460	33,775,916	51,022,195	51,674,509	60,506,724	90%	122%
Peak	37,693,855	36,608,166	30,709,297	31,564,739	44,263,463	34,612,171	17%	-8%
Fall Shoulder	33,203,584	40,108,120	55,504,840	73,141,626	90,855,566	117,695,195	174%	254%
Other Months	120,061,267	170,916,487	161,868,321	198,603,319	235,829,726	n/a	96%	n/a
Annual Total	218,180,863	277,152,232	281,858,373	354,331,879	422,623,263	n/a	94%	
Shoulders	60,425,742	69,627,580	89,280,756	124,163,821	142,530,075	178,201,920	136%	195%

Domestic Market Share (% of quantity)

						Jan-Oct	*Percentage Point Change*	
Season	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**
Spring Shoulder	46.1%	18.1%	48.6%	37.8%	41.7%	30.3%	-4.4%	-15.8%
Peak	82.8%	84.7%	84.1%	84.9%	81.0%	82.0%	-1.8%	-0.8%
Fall Shoulder	55.1%	47.7%	47.6%	39.9%	41.7%	30.6%	-13.3%	-24.5%
Other Months	0.0%	0.0%	0.2%	1.0%	0.5%	n/a	0.5%	n/a
Annual Total	52.9%	47.0%	46.5%	42.2%	40.9%	n/a	-12.0%	
Shoulders	51.4%	38.2%	48.0%	39.1%	41.7%	30.5%	-9.7%	-20.9%

Import Market Share (% of quantity)

						Jan-Oct	*Percentage Point Change*	
Season	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**
Spring Shoulder	53.9%	81.9%	51.4%	62.2%	58.3%	69.7%	4.4%	15.8%
Peak	17.2%	15.3%	15.9%	15.1%	19.0%	18.0%	1.8%	0.8%
Fall Shoulder	44.9%	52.3%	52.4%	60.1%	58.3%	69.4%	13.3%	24.5%
Other Months	100.0%	100.0%	99.8%	99.0%	99.5%	n/a	-0.5%	n/a
Annual Total	47.1%	53.0%	53.5%	57.8%	59.1%	n/a	12.0%	
Shoulders	48.6%	61.8%	52.0%	60.9%	58.3%	69.5%	9.7%	20.9%

Summary of Monthly U.S. Fresh Cultivated Shipments Volume, Price, Revenue, and Profits, Jan 2015 - Oct 2020

Domestic Volume (pounds)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020
1	0	0	0	717,558	284,968	427,303	n/a	n/a
2	0	0	0	1,101,080	672,524	1,572,839	n/a	n/a
3	1,982,034	477,027	4,037,353	1,880,496	5,345,997	5,773,137	170%	191%
4	21,254,950	6,063,743	27,932,973	29,184,798	31,585,835	20,492,365	49%	-4%
5	62,613,383	67,297,451	41,846,475	37,585,170	52,833,037	53,421,976	-16%	-15%
6	72,306,470	72,755,737	54,763,886	55,722,055	84,703,841	45,421,408	17%	-37%
7	46,492,843	62,426,276	65,985,820	84,176,924	51,567,780	59,295,121	11%	28%
8	29,013,195	26,364,896	27,572,684	31,622,019	40,020,883	38,930,038	38%	34%
9	10,523,654	8,971,770	19,233,060	16,899,718	23,139,389	11,600,824	120%	10%
10	1,151,467	1,220,087	3,708,854	86,602	1,949,180	1,309,184	69%	14%
11	0	0	0	0	68,392	n/a	n/a	n/a
12	0	0	370,885	86,602	148,183	n/a	n/a	n/a
Total	245,337,996	245,576,987	245,451,991	259,063,020	292,320,010	238,244,196	19%	n/a

Domestic Weighted Price ($/lb)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020	Change ($/lb) 2015-2019
1	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	$6.89	n/a	$6.78	$6.40	$5.46	$5.37	-20.8%	-22.1%	-$1.43
4	$4.63	$7.59	$4.71	$4.27	$3.67	$2.74	-20.8%	-40.8%	-$0.96
5	$2.82	$3.00	$3.88	$4.45	$2.33	$2.64	-17.3%	-6.3%	-$0.49
6	$1.72	$1.91	$2.64	$2.73	$2.39	$2.50	38.8%	45.6%	$0.67
7	$1.73	$1.93	$2.34	$1.91	$2.23	$2.71	29.0%	56.8%	$0.50
8	$2.93	$2.97	$2.59	$2.32	$2.11	$2.32	-27.7%	-20.9%	-$0.81
9	$4.99	$4.74	$3.41	$3.60	$2.88	$3.10	-42.3%	-37.9%	-$2.11
10	$6.67	n/a	$5.07	n/a	$2.95	$4.22	-55.8%	-36.7%	-$3.72
11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
12	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
						Shoulder Average	-33.5%		

Import Volume (pounds)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020
1	42,825,152	48,669,426	57,218,099	58,015,564	64,959,076	61,765,228	52%	44%
2	34,336,758	50,746,747	43,423,393	56,694,943	59,257,585	47,720,029	73%	39%
3	19,549,304	20,366,106	21,477,855	35,182,029	31,543,703	36,181,093	61%	85%
4	7,672,853	9,153,354	12,298,061	15,840,166	20,130,806	24,325,631	162%	217%
5	2,978,046	4,104,308	6,402,721	8,140,157	8,418,527	11,331,350	183%	280%
6	7,321,979	8,364,540	1,974,788	2,234,906	2,477,034	3,533,802	-66%	-52%
7	27,393,829	24,139,318	22,331,788	21,189,675	33,367,902	19,747,019	22%	-28%
8	16,058,280	12,080,183	21,270,448	24,658,098	26,739,697	27,726,088	67%	73%
9	4,634,796	7,055,463	10,266,841	15,978,542	25,035,671	35,369,715	440%	663%
10	12,510,507	20,972,474	23,967,551	32,504,987	39,080,197	54,599,392	212%	336%
11	17,276,379	23,401,352	28,925,824	34,853,326	48,592,088	n/a	181%	n/a
12	25,622,978	48,098,962	32,301,005	49,039,485	63,020,977	n/a	146%	n/a
Total	218,180,863	277,152,232	281,858,373	354,331,879	422,623,263	322,299,347	94%	n/a

Import Weighted Price ($/lb)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020
1	$3.03	$3.32	$1.92	$3.16	$2.46	$1.72	-18.9%	-43.3%
2	$3.32	$2.94	$2.82	$2.53	$2.13	$2.64	-35.7%	-20.4%
3	$3.12	$3.46	$3.93	$2.41	$2.89	$4.24	-7.3%	35.7%
4	$4.65	$7.26	$4.90	$4.18	$3.97	$2.53	-14.8%	-45.6%
5	$2.80	$4.10	$3.50	$3.77	$2.04	$2.20	-27.2%	-21.6%
6	$1.37	$1.78	n/a	$3.20	n/a	$1.92	n/a	39.9%
7	$1.25	$1.90	$2.00	$1.44	$2.01	$1.92	61.2%	54.1%
8	$2.53	$2.62	$2.27	$1.85	$1.82	$1.94	-28.1%	-23.2%
9	$5.53	$3.43	$2.86	$3.78	$3.47	$2.98	-37.3%	-46.1%
10	$7.96	$6.11	$4.98	$5.82	$3.87	$4.01	-51.4%	-49.6%
11	$6.52	$3.93	$4.62	$3.27	$3.30	n/a	-49.4%	n/a
12	$4.25	$3.10	$5.06	$3.27	$2.45	n/a	-42.2%	n/a

U.S. Market Volume (pounds)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020
1	42,825,152	48,669,426	57,218,099	58,733,121	65,244,044	62,192,531	52%	45%
2	34,336,758	50,746,747	43,423,393	57,796,023	59,930,109	49,292,868	75%	44%
3	21,531,338	20,843,132	25,515,208	37,062,525	36,889,700	41,954,230	71%	95%
4	28,927,803	15,217,097	40,231,033	45,024,964	51,716,641	44,817,996	79%	55%
5	65,591,429	71,401,760	48,249,196	45,725,327	61,251,564	64,753,326	-7%	-1%
6	79,628,449	81,120,277	56,738,673	57,956,962	87,180,874	48,955,210	9%	-39%
7	73,886,673	86,565,593	88,317,608	105,366,599	84,935,683	79,042,140	15%	7%
8	45,071,476	38,445,079	48,843,132	56,280,117	66,760,581	66,656,126	48%	48%
9	15,158,450	16,027,234	29,499,901	32,878,259	48,175,060	46,970,539	218%	210%
10	13,661,974	22,192,561	27,676,406	32,591,588	41,029,377	55,908,576	200%	309%
11	17,276,379	23,401,352	28,925,824	34,853,326	48,660,480	n/a	182%	n/a
12	25,622,978	48,098,962	32,671,890	49,126,087	63,169,161	n/a	147%	n/a
Total	463,518,860	522,729,219	527,310,364	613,394,898	714,943,273	560,543,542	54%	n/a

U.S. Market Weighted Price ($/lb)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020
1	$3.03	$3.32	$1.92	$3.16	$2.46	$1.72	-19%	-43%
2	$3.32	$2.94	$2.82	$2.53	$2.13	$2.64	-36%	-20%
3	$3.47	$3.46	$4.38	$2.61	$3.27	$4.39	-6%	27%
4	$4.63	$7.39	$4.77	$4.24	$3.78	$2.63	-18%	-43%
5	$2.82	$3.06	$3.83	$4.33	$2.29	$2.56	-19%	-9%
6	$1.69	$1.89	$2.64	$2.74	$2.39	$2.46	41%	46%
7	$1.55	$1.92	$2.26	$1.82	$2.14	$2.51	38%	62%
8	$2.78	$2.86	$2.45	$2.11	$2.00	$2.16	-28%	-22%
9	$5.15	$4.16	$3.22	$3.68	$3.18	$3.01	-38%	-42%
10	$7.85	$6.11	$4.99	$5.82	$3.83	$4.02	-51%	-49%
11	$6.52	$3.93	$4.62	$3.27	$3.30	n/a	-49%	n/a
12	$4.25	$3.10	$5.06	$3.27	$2.45	n/a	-42%	n/a
W.Avg.	$3.06	$3.04	$3.26	$3.05	$2.65	$2.74	-13%	-11%

Total volume-weighted average of monthly U.S. market prices.

Domestic Market Share (% of quantity)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	Percentage Point Change 2015-2019	Percentage Point Change 2015-2020
1	0.0%	0.0%	0.0%	1.2%	0.4%	0.7%	0.4%	0.7%
2	0.0%	0.0%	0.0%	1.9%	1.1%	3.2%	1.1%	3.2%
3	9.2%	2.3%	15.8%	5.1%	14.5%	13.8%	5.3%	4.6%
4	73.5%	39.8%	69.4%	64.8%	61.1%	45.7%	-12.4%	-27.8%
5	95.5%	94.3%	86.7%	82.2%	86.3%	82.5%	-9.2%	-13.0%
6	90.8%	89.7%	96.5%	96.1%	97.2%	92.8%	6.4%	2.0%
7	62.9%	72.1%	74.7%	79.9%	60.7%	75.0%	-2.2%	12.1%
8	64.4%	68.6%	56.5%	56.2%	59.9%	58.4%	-4.4%	-6.0%
9	69.4%	56.0%	65.2%	51.4%	48.0%	24.7%	-21.4%	-44.7%
10	8.4%	5.5%	13.4%	0.3%	4.8%	2.3%	-3.7%	-6.1%
11	0.0%	0.0%	0.0%	0.0%	0.1%	n/a	0.1%	n/a
12	0.0%	0.0%	1.1%	0.2%	0.2%	n/a	0.2%	n/a
Total	52.9%	47.0%	46.5%	42.2%	40.9%	42.5%	-22.8%	n/a

U.S. Market Implied Value ($)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	% Change 2015-2019	% Change 2015-2020
1	129,850,070	161,721,677	110,134,524	185,608,025	160,510,742	106,889,082	24%	-18%
2	113,990,469	149,061,831	122,555,663	146,014,197	127,846,704	130,325,891	12%	14%
3	74,725,249	72,092,427	111,720,636	96,759,699	120,503,433	184,327,790	61%	147%
4	134,008,761	112,451,822	191,949,645	190,944,571	195,593,306	117,735,792	46%	-12%
5	184,815,591	218,779,392	184,863,411	198,052,652	140,332,149	165,961,600	-24%	-10%
6	134,333,528	153,525,308	149,651,703	159,040,431	208,031,850	120,447,663	55%	-10%
7	114,471,717	165,966,619	199,195,554	191,626,035	181,970,726	198,518,747	59%	73%
8	125,451,830	109,909,560	119,534,955	118,903,287	133,194,176	143,929,954	6%	15%
9	78,135,144	66,725,603	94,982,043	121,108,214	153,395,886	141,364,879	96%	81%
10	107,252,012	135,496,623	138,224,627	189,768,121	156,937,416	224,484,335	46%	109%
11	112,665,452	92,006,955	133,501,390	113,983,181	160,620,129	n/a	43%	n/a
12	108,808,394	149,183,163	165,182,992	160,868,193	155,016,894	n/a	42%	n/a
Total	1,418,508,219	1,586,920,980	1,721,497,143	1,872,676,605	1,893,953,412	1,533,985,733	34%	n/a

Import Market Share (% of quantity)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	Percentage Point Change 2015-2019	Percentage Point Change 2015-2020
1	100.0%	100.0%	100.0%	98.8%	99.6%	99.3%	-0.4%	-0.7%
2	100.0%	100.0%	100.0%	98.1%	98.9%	96.8%	-1.1%	-3.2%
3	90.8%	97.7%	84.2%	94.9%	85.5%	86.2%	-5.3%	-4.6%
4	26.5%	60.2%	30.6%	35.2%	38.9%	54.3%	12.4%	27.8%
5	4.5%	5.7%	13.3%	17.8%	13.7%	17.5%	9.2%	13.0%
6	9.2%	10.3%	3.5%	3.9%	2.8%	7.2%	-6.4%	-2.0%
7	37.1%	27.9%	25.3%	20.1%	39.3%	25.0%	2.2%	-12.1%
8	35.6%	31.4%	43.5%	43.8%	40.1%	41.6%	4.4%	6.0%
9	30.6%	44.0%	34.8%	48.6%	52.0%	75.3%	21.4%	44.7%
10	91.6%	94.5%	86.6%	99.7%	95.2%	97.7%	3.7%	6.1%
11	100.0%	100.0%	100.0%	100.0%	99.9%	n/a	-0.1%	n/a
12	100.0%	100.0%	98.9%	99.8%	99.8%	n/a	-0.2%	n/a
Total	47.1%	53.0%	53.5%	57.8%	59.1%	57.5%	25.6%	n/a

Domestic Volume and Implied Revenue, Jan 2015 - Oct 2020

Implied domestic revenue is calculated by multiplying U.S. prices by U.S. quantities.

Domestic Volume (pounds)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	2019 % of Year
1	0	0	0	717,558	284,968	427,303	0.1%
2	0	0	0	1,101,080	672,524	1,572,839	0.2%
3	1,982,034	477,027	4,037,353	1,880,496	5,345,997	5,773,137	1.8%
4	21,254,950	6,063,743	27,932,973	29,184,798	31,585,835	20,492,365	10.8%
5	62,613,383	67,297,451	41,846,475	37,585,170	52,833,037	53,421,976	18.1%
6	72,306,470	72,755,737	54,763,886	55,722,055	84,703,841	45,421,408	29.0%
7	46,492,843	62,426,276	65,985,820	84,176,924	51,567,780	59,295,121	17.6%
8	29,013,195	26,364,896	27,572,684	31,622,019	40,020,883	38,930,038	13.7%
9	10,523,654	8,971,770	19,233,060	16,899,718	23,139,389	11,600,824	7.9%
10	1,151,467	1,220,087	3,708,854	86,602	1,949,180	1,309,184	0.7%
11	0	0	0	0	68,392	n/a	0.0%
12	0	0	370,885	86,602	148,183	n/a	0.1%
Total	245,337,996	245,576,987	245,451,991	259,063,020	292,320,010	238,244,196	

Implied Domestic Revenue ($)

Month	2015	2016	2017	2018	2019	Jan-Oct 2020	2019 % of Year
1	n/a	n/a	n/a	n/a	n/a	n/a	0.0%
2	n/a	n/a	n/a	n/a	n/a	n/a	0.0%
3	13,665,567	n/a	27,363,590	12,035,728	29,205,735	30,998,152	3.9%
4	98,317,501	46,035,300	131,695,926	124,740,256	115,769,488	56,133,631	15.6%
5	176,473,911	201,932,018	162,468,739	167,332,711	123,168,641	141,085,225	16.6%
6	124,303,355	138,652,219	144,443,081	151,883,607	202,121,128	113,674,538	27.2%
7	80,268,748	120,186,332	154,576,029	161,069,018	114,813,661	160,513,279	15.5%
8	84,895,242	78,266,919	71,300,580	73,321,699	84,618,511	90,139,357	11.4%
9	52,519,169	42,526,322	65,577,018	60,775,598	66,587,288	35,927,079	9.0%
10	7,683,114	n/a	18,813,445	n/a	5,746,962	5,528,705	0.8%
11	n/a	n/a	n/a	n/a	n/a	n/a	0.0%
12	n/a	n/a	n/a	n/a	n/a	n/a	0.0%
Total	638,126,606	627,599,109	776,238,407	751,158,617	742,031,414	633,999,965	

Monthly and Seasonal Share of Domestic Volume and Revenue

Monthly Share of Domestic Volume

Month	2015	2016	2017	2018	2019	*Total* 2015-2019
1	0.0%	0.0%	0.0%	0.3%	0.1%	0.1%
2	0.0%	0.0%	0.0%	0.4%	0.2%	0.1%
3	0.8%	0.2%	1.6%	0.7%	1.8%	1.1%
4	8.7%	2.5%	11.4%	11.3%	10.8%	9.0%
5	25.5%	27.4%	17.0%	14.5%	18.1%	20.4%
6	29.5%	29.6%	22.3%	21.5%	29.0%	26.4%
7	19.0%	25.4%	26.9%	32.5%	17.6%	24.1%
8	11.8%	10.7%	11.2%	12.2%	13.7%	12.0%
9	4.3%	3.7%	7.8%	6.5%	7.9%	6.1%
10	0.5%	0.5%	1.5%	0.0%	0.7%	0.6%
11	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	0.0%	0.0%	0.2%	0.0%	0.1%	0.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Monthly Share of Domestic Revenue

Month	2015	2016	2017	2018	2019	*Total* 2015-2019
1	n/a	n/a	n/a	n/a	n/a	0.0%
2	n/a	n/a	n/a	n/a	n/a	0.0%
3	2.1%	n/a	3.5%	1.6%	3.9%	2.7%
4	15.4%	7.3%	17.0%	16.6%	15.6%	13.7%
5	27.7%	32.2%	20.9%	22.3%	16.6%	23.3%
6	19.5%	22.1%	18.6%	20.2%	27.2%	21.0%
7	12.6%	19.2%	19.9%	21.4%	15.5%	19.0%
8	13.3%	12.5%	9.2%	9.8%	11.4%	11.6%
9	8.2%	6.8%	8.4%	8.1%	9.0%	7.8%
10	1.2%	n/a	2.4%	n/a	0.8%	0.9%
11	n/a	n/a	n/a	n/a	n/a	0.0%
12	n/a	n/a	n/a	n/a	n/a	0.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Season Share of Domestic Volume (%)

Season	2015	2016	2017	2018	2019	*Total* 2015-2019
Spring Shoulder	9.5%	2.7%	13.0%	12.0%	12.6%	10.1%
Peak	73.9%	82.5%	66.2%	68.5%	64.7%	70.9%
Fall Shoulder	16.6%	14.9%	20.6%	18.8%	22.3%	18.8%
Other Months	0.0%	0.0%	0.2%	0.7%	0.4%	0.3%
Annual Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Shoulders	26.1%	17.5%	33.6%	30.8%	34.9%	28.8%

Season Share of Domestic Revenue (%)

Season	2015	2016	2017	2018	2019	*Total* 2015-2019
Spring Shoulder	17.5%	7.3%	20.5%	18.2%	19.5%	16.9%
Peak	59.7%	73.4%	59.5%	63.9%	59.3%	62.9%
Fall Shoulder	22.7%	19.2%	20.1%	17.9%	21.2%	20.2%
Other Months	n/a	n/a	n/a	n/a	n/a	0.0%
Annual Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Shoulders	40.3%	26.6%	40.5%	36.1%	40.7%	37.1%

Volume, Price, and Revenue, Jan 2015 - Oct 2020 Monthly

Sources: Agronometrics Movement and Shippint Point datasets, USITC DataWeb, and Table IV-3. See Data Explanation.

Note: U.S. revenue can only be estimated for months with price observations in the Shipping Point dataset. Three missing U.S. weekly price observations are estimated based on proximate prices, as explained in the Data Explanation.

		pounds	*$/lb*	*$*			
Status	**Date**	**Quantity**	**Price**	**Revenue**	**Year**	**Month**	**Season**
USA	Jan-15	0		0	2015	1	Winter
USA	Feb-15	0		0	2015	2	Winter
USA	Mar-15	1,982,034	6.89	13,665,567	2015	3	Spring Shoulder
USA	Apr-15	21,254,950	4.63	98,317,504	2015	4	Spring Shoulder
USA	May-15	62,613,383	2.82	176,473,904	2015	5	Peak
USA	Jun-15	72,306,470	1.72	124,303,352	2015	6	Peak
USA	Jul-15	46,492,843	1.73	80,268,752	2015	7	Peak
USA	Aug-15	29,013,195	2.93	84,895,240	2015	8	Fall Shoulder
USA	Sep-15	10,523,654	4.99	52,519,168	2015	9	Fall Shoulder
USA	Oct-15	1,151,467	6.67	7,683,114	2015	10	Fall Shoulder
USA	Nov-15	0		0	2015	11	Winter
USA	Dec-15	0		0	2015	12	Winter
USA	Jan-16	0		0	2016	1	Winter
USA	Feb-16	0		0	2016	2	Winter
USA	Mar-16	477,027		0	2016	3	Spring Shoulder
USA	Apr-16	6,063,743	7.59	46,035,300	2016	4	Spring Shoulder
USA	May-16	67,297,451	3.00	201,932,016	2016	5	Peak
USA	Jun-16	72,755,737	1.91	138,652,224	2016	6	Peak
USA	Jul-16	62,426,276	1.93	120,186,328	2016	7	Peak
USA	Aug-16	26,364,896	2.97	78,266,920	2016	8	Fall Shoulder
USA	Sep-16	8,971,770	4.74	42,526,324	2016	9	Fall Shoulder
USA	Oct-16	1,220,087		0	2016	10	Fall Shoulder
USA	Nov-16	0		0	2016	11	Winter
USA	Dec-16	0		0	2016	12	Winter
USA	Jan-17	0		0	2017	1	Winter
USA	Feb-17	0		0	2017	2	Winter
USA	Mar-17	4,037,353	6.78	27,363,590	2017	3	Spring Shoulder
USA	Apr-17	27,932,973	4.71	131,695,928	2017	4	Spring Shoulder
USA	May-17	41,846,475	3.88	162,468,736	2017	5	Peak
USA	Jun-17	54,763,886	2.64	144,443,088	2017	6	Peak
USA	Jul-17	65,985,820	2.34	154,576,032	2017	7	Peak
USA	Aug-17	27,572,684	2.59	71,300,584	2017	8	Fall Shoulder
USA	Sep-17	19,233,060	3.41	65,577,016	2017	9	Fall Shoulder
USA	Oct-17	3,708,854	5.07	18,813,444	2017	10	Fall Shoulder
USA	Nov-17	0		0	2017	11	Winter
USA	Dec-17	370,885		0	2017	12	Winter
USA	Jan-18	717,558		0	2018	1	Winter
USA	Feb-18	1,101,080		0	2018	2	Winter

Status	Date	Quantity	Price	Revenue	Year	Month	Season
USA	Mar-18	1,880,496	6.40	12,035,728	2018	3	Spring Shoulder
USA	Apr-18	29,184,798	4.27	124,740,256	2018	4	Spring Shoulder
USA	May-18	37,585,170	4.45	167,332,704	2018	5	Peak
USA	Jun-18	55,722,055	2.73	151,883,600	2018	6	Peak
USA	Jul-18	84,176,924	1.91	161,069,024	2018	7	Peak
USA	Aug-18	31,622,019	2.32	73,321,696	2018	8	Fall Shoulder
USA	Sep-18	16,899,718	3.60	60,775,596	2018	9	Fall Shoulder
USA	Oct-18	86,602		0	2018	10	Fall Shoulder
USA	Nov-18	0		0	2018	11	Winter
USA	Dec-18	86,602		0	2018	12	Winter
USA	Jan-19	284,968		0	2019	1	Winter
USA	Feb-19	672,524		0	2019	2	Winter
USA	Mar-19	5,345,997	5.46	29,205,734	2019	3	Spring Shoulder
USA	Apr-19	31,585,835	3.67	115,769,488	2019	4	Spring Shoulder
USA	May-19	52,833,037	2.33	123,168,640	2019	5	Peak
USA	Jun-19	84,703,841	2.39	202,121,136	2019	6	Peak
USA	Jul-19	51,567,780	2.23	114,813,664	2019	7	Peak
USA	Aug-19	40,020,883	2.11	84,618,512	2019	8	Fall Shoulder
USA	Sep-19	23,139,389	2.88	66,587,288	2019	9	Fall Shoulder
USA	Oct-19	1,949,180	2.95	5,746,963	2019	10	Fall Shoulder
USA	Nov-19	68,392		0	2019	11	Winter
USA	Dec-19	148,183		0	2019	12	Winter
USA	Jan-20	427,303		0	2020	1	Winter
USA	Feb-20	1,572,839		0	2020	2	Winter
USA	Mar-20	5,773,137	5.37	30,998,152	2020	3	Spring Shoulder
USA	Apr-20	20,492,365	2.74	56,133,632	2020	4	Spring Shoulder
USA	May-20	53,421,976	2.64	141,085,232	2020	5	Peak
USA	Jun-20	45,421,408	2.50	113,674,536	2020	6	Peak
USA	Jul-20	59,295,121	2.71	160,513,280	2020	7	Peak
USA	Aug-20	38,930,038	2.32	90,139,360	2020	8	Fall Shoulder
USA	Sep-20	11,600,824	3.10	35,927,080	2020	9	Fall Shoulder
USA	Oct-20	1,309,184	4.22	5,528,705	2020	10	Fall Shoulder
Imports	Jan-15	42,825,152	3.03	n/a	2015	1	Winter
Imports	Feb-15	34,336,758	3.32	n/a	2015	2	Winter
Imports	Mar-15	19,549,304	3.12	n/a	2015	3	Spring Shoulder
Imports	Apr-15	7,672,853	4.65	n/a	2015	4	Spring Shoulder
Imports	May-15	2,978,046	2.80	n/a	2015	5	Peak
Imports	Jun-15	7,321,979	1.37	n/a	2015	6	Peak
Imports	Jul-15	27,393,829	1.25	n/a	2015	7	Peak
Imports	Aug-15	16,058,280	2.53	n/a	2015	8	Fall Shoulder
Imports	Sep-15	4,634,796	5.53	n/a	2015	9	Fall Shoulder
Imports	Oct-15	12,510,507	7.96	n/a	2015	10	Fall Shoulder
Imports	Nov-15	17,276,379	6.52	n/a	2015	11	Winter
Imports	Dec-15	25,622,978	4.25	n/a	2015	12	Winter
Imports	Jan-16	48,669,426	3.32	n/a	2016	1	Winter
Imports	Feb-16	50,746,747	2.94	n/a	2016	2	Winter

Status	Date	Quantity	Price	Revenue	Year	Month	Season
Imports	Mar-16	20,366,106	3.46	n/a	2016	3	Spring Shoulder
Imports	Apr-16	9,153,354	7.26	n/a	2016	4	Spring Shoulder
Imports	May-16	4,104,308	4.10	n/a	2016	5	Peak
Imports	Jun-16	8,364,540	1.78	n/a	2016	6	Peak
Imports	Jul-16	24,139,318	1.90	n/a	2016	7	Peak
Imports	Aug-16	12,080,183	2.62	n/a	2016	8	Fall Shoulder
Imports	Sep-16	7,055,463	3.43	n/a	2016	9	Fall Shoulder
Imports	Oct-16	20,972,474	6.11	n/a	2016	10	Fall Shoulder
Imports	Nov-16	23,401,352	3.93	n/a	2016	11	Winter
Imports	Dec-16	48,098,962	3.10	n/a	2016	12	Winter
Imports	Jan-17	57,218,099	1.92	n/a	2017	1	Winter
Imports	Feb-17	43,423,393	2.82	n/a	2017	2	Winter
Imports	Mar-17	21,477,855	3.93	n/a	2017	3	Spring Shoulder
Imports	Apr-17	12,298,061	4.90	n/a	2017	4	Spring Shoulder
Imports	May-17	6,402,721	3.50	n/a	2017	5	Peak
Imports	Jun-17	1,974,788		n/a	2017	6	Peak
Imports	Jul-17	22,331,788	2.00	n/a	2017	7	Peak
Imports	Aug-17	21,270,448	2.27	n/a	2017	8	Fall Shoulder
Imports	Sep-17	10,266,841	2.86	n/a	2017	9	Fall Shoulder
Imports	Oct-17	23,967,551	4.98	n/a	2017	10	Fall Shoulder
Imports	Nov-17	28,925,824	4.62	n/a	2017	11	Winter
Imports	Dec-17	32,301,005	5.06	n/a	2017	12	Winter
Imports	Jan-18	58,015,564	3.16	n/a	2018	1	Winter
Imports	Feb-18	56,694,943	2.53	n/a	2018	2	Winter
Imports	Mar-18	35,182,029	2.41	n/a	2018	3	Spring Shoulder
Imports	Apr-18	15,840,166	4.18	n/a	2018	4	Spring Shoulder
Imports	May-18	8,140,157	3.77	n/a	2018	5	Peak
Imports	Jun-18	2,234,906	3.20	n/a	2018	6	Peak
Imports	Jul-18	21,189,675	1.44	n/a	2018	7	Peak
Imports	Aug-18	24,658,098	1.85	n/a	2018	8	Fall Shoulder
Imports	Sep-18	15,978,542	3.78	n/a	2018	9	Fall Shoulder
Imports	Oct-18	32,504,987	5.82	n/a	2018	10	Fall Shoulder
Imports	Nov-18	34,853,326	3.27	n/a	2018	11	Winter
Imports	Dec-18	49,039,485	3.27	n/a	2018	12	Winter
Imports	Jan-19	64,959,076	2.46	n/a	2019	1	Winter
Imports	Feb-19	59,257,585	2.13	n/a	2019	2	Winter
Imports	Mar-19	31,543,703	2.89	n/a	2019	3	Spring Shoulder
Imports	Apr-19	20,130,806	3.97	n/a	2019	4	Spring Shoulder
Imports	May-19	8,418,527	2.04	n/a	2019	5	Peak
Imports	Jun-19	2,477,034		n/a	2019	6	Peak
Imports	Jul-19	33,367,902	2.01	n/a	2019	7	Peak
Imports	Aug-19	26,739,697	1.82	n/a	2019	8	Fall Shoulder
Imports	Sep-19	25,035,671	3.47	n/a	2019	9	Fall Shoulder
Imports	Oct-19	39,080,197	3.87	n/a	2019	10	Fall Shoulder
Imports	Nov-19	48,592,088	3.30	n/a	2019	11	Winter
Imports	Dec-19	63,020,977	2.45	n/a	2019	12	Winter

Status	Date	Quantity	Price	Revenue	Year	Month	Season
Imports	Jan-20	61,765,228	1.72	n/a	2020	1	Winter
Imports	Feb-20	47,720,029	2.64	n/a	2020	2	Winter
Imports	Mar-20	36,181,093	4.24	n/a	2020	3	Spring Shoulder
Imports	Apr-20	24,325,631	2.53	n/a	2020	4	Spring Shoulder
Imports	May-20	11,331,350	2.20	n/a	2020	5	Peak
Imports	Jun-20	3,533,802	1.92	n/a	2020	6	Peak
Imports	Jul-20	19,747,019	1.92	n/a	2020	7	Peak
Imports	Aug-20	27,726,088	1.94	n/a	2020	8	Fall Shoulder
Imports	Sep-20	35,369,715	2.98	n/a	2020	9	Fall Shoulder
Imports	Oct-20	54,599,392	4.01	n/a	2020	10	Fall Shoulder

Attachment B

Monthly Profit Calculation

Source: Data derived from Monthly Volume and Price Data exhibit within this submission; annual financial data from Staff Report Table C-1; monthly shares of annual quantity and value calculated within this exhibit. Unit expenses are applied uniformly over the year. Due to rounding, numbers differ slightly from the Staff Report, which was reported in $1,000s.

Quantities in pounds, values in dollars, unit values in dollars per pound.

Note
This analysis assesses the impact of price declines on the domestic industry's financials, accounting for the fluctuations in price and the distribution of sales within the year. It is intended to illustrate relative trends and is not a comprehensive model of the industry's monthly financial performance: it assumes constant unit costs throughout the year and therefore does not account for intra-year variation in costs across growing regions. This analysis also does not consider the mix of fixed and variable costs, which are crucial to understanding how any remedial order would affect industry financial performance.

Annual Financial Performance

Net sales:	2015	2016	2017	2018	2019
Quantity	218,422,000	259,026,000	239,124,000	219,681,000	262,187,000
Value	404,377,000	415,157,000	433,963,000	418,348,000	455,486,000
Unit value	$1.85	$1.60	$1.81	$1.90	$1.74
Operating expenses	337,333,000	361,910,000	345,835,000	346,376,000	398,056,000
Operating income or (loss)	67,044,000	53,247,000	88,128,000	71,972,000	57,430,000
Other expenses	39,048,000	39,940,000	36,128,000	37,500,000	49,321,000
Total expenses	376,381,000	401,850,000	381,963,000	383,876,000	447,377,000
Net income or (loss)	27,996,000	13,307,000	52,000,000	34,472,000	8,109,000
Average unit total expenses	$1.72	$1.55	$1.60	$1.75	$1.71

Month s Share of Annual Volume

Month	2015	2016	2017	2018	2019
1	0.0%	0.0%	0.0%	0.3%	0.1%
2	0.0%	0.0%	0.0%	0.4%	0.2%
3	0.8%	0.2%	1.6%	0.7%	1.8%
4	8.7%	2.5%	11.4%	11.3%	10.8%
5	25.5%	27.4%	17.0%	14.5%	18.1%
6	29.5%	29.6%	22.3%	21.5%	29.0%
7	19.0%	25.4%	26.9%	32.5%	17.6%
8	11.8%	10.7%	11.2%	12.2%	13.7%
9	4.3%	3.7%	7.8%	6.5%	7.9%
10	0.5%	0.5%	1.5%	0.0%	0.7%
11	0.0%	0.0%	0.0%	0.0%	0.0%
12	0.0%	0.0%	0.2%	0.0%	0.1%

Monthly Net Sales Quantity

Month	2015	2016	2017	2018	2019
1	0	0	0	608,477	255,593
2	0	0	0	933,697	603,199
3	1,764,585	503,151	3,933,266	1,594,628	4,794,919
4	18,923,072	6,395,823	27,212,834	24,748,208	28,329,896
5	55,744,077	70,982,994	40,767,633	31,871,580	47,386,888
6	64,373,738	76,740,202	53,352,020	47,251,348	75,972,377
7	41,392,120	65,845,048	64,284,641	71,380,589	46,252,056
8	25,830,162	27,808,768	26,861,833	26,814,930	35,895,440
9	9,369,106	9,463,109	18,737,213	14,330,671	20,754,128
10	1,025,140	1,286,905	3,613,237	73,437	1,748,254
11	0	0	0	0	61,342
12	0	0	361,324	73,437	132,908

Month s Share of Annual Revenue

Month	2015	2016	2017	2018	2019
1	0.0%	0.0%	0.0%	0.0%	0.0%
2	0.0%	0.0%	0.0%	0.0%	0.0%
3	2.1%	0.0%	3.5%	1.6%	3.9%
4	15.4%	7.3%	17.0%	16.6%	15.6%
5	27.7%	32.2%	20.9%	22.3%	16.6%
6	19.5%	22.1%	18.6%	20.2%	27.2%
7	12.6%	19.2%	19.9%	21.4%	15.5%
8	13.3%	12.5%	9.2%	9.8%	11.4%
9	8.2%	6.8%	8.4%	8.1%	9.0%
10	1.2%	0.0%	2.4%	0.0%	0.8%
11	0.0%	0.0%	0.0%	0.0%	0.0%
12	0.0%	0.0%	0.0%	0.0%	0.0%

Monthly Net Sales Value

Month	2015	2016	2017	2018	2019
1	0	0	0	0	0
2	0	0	0	0	0
3	8,659,788	0	15,297,859	6,703,142	17,927,547
4	62,303,210	30,452,365	73,625,781	69,472,459	71,063,543
5	111,830,458	133,578,090	90,829,596	93,193,772	75,605,413
6	78,770,290	91,718,485	80,752,192	84,589,595	124,069,335
7	50,865,824	79,503,295	86,417,107	89,705,290	70,476,821
8	53,797,605	51,773,590	39,861,225	40,835,564	51,941,935
9	33,281,082	28,131,175	36,661,416	33,848,177	40,873,711
10	4,868,743	0	10,517,824	0	3,527,696
11	0	0	0	0	0
12	0	0	0	0	0

Unit Net Sales

Month	2015	2016	2017	2018	2019
1	n/a	n/a	n/a	$0.00	$0.00
2	n/a	n/a	n/a	$0.00	$0.00
3	$4.91	$0.00	$3.89	$4.20	$3.74
4	$3.29	$4.76	$2.71	$2.81	$2.51
5	$2.01	$1.88	$2.23	$2.92	$1.60
6	$1.22	$1.20	$1.51	$1.79	$1.63
7	$1.23	$1.21	$1.34	$1.26	$1.52
8	$2.08	$1.86	$1.48	$1.52	$1.45
9	$3.55	$2.97	$1.96	$2.36	$1.97
10	$4.75	$0.00	$2.91	$0.00	$2.02
11	n/a	n/a	n/a	n/a	$0.00
12	n/a	n/a	$0.00	$0.00	$0.00

Unit Net Income (subtracts Unit Total Expenses from Unit Net Sales,

Month	2015	2016	2017	2018	2019	*% Change* 2015-2019
1	n/a	n/a	n/a	n/a	n/a	n/a
2	n/a	n/a	n/a	n/a	n/a	n/a
3	$3.18	n/a	$2.29	$2.46	$2.03	-36.2%
4	$1.57	$3.21	$1.11	$1.06	$0.80	-48.9%
5	$0.28	$0.33	$0.63	$1.18	-$0.11	-139.2%
6	-$0.50	-$0.36	-$0.08	$0.04	-$0.07	-85.3%
7	-$0.49	-$0.34	-$0.25	-$0.49	-$0.18	-63.1%
8	$0.36	$0.31	-$0.11	-$0.22	-$0.26	-172.1%
9	$1.83	$1.42	$0.36	$0.61	$0.26	-85.6%
10	$3.03	n/a	$1.31	n/a	$0.31	-89.7%
11	n/a	n/a	n/a	n/a	n/a	n/a
12	n/a	n/a	n/a	n/a	n/a	n/a

Total Net Income

Month	2015	2016	2017	2018	2019
1	0	0	0	0	0
2	0	0	0	0	0
3	5,619,086	0	9,015,085	3,916,650	9,745,843
4	29,695,300	20,529,957	30,157,557	26,226,830	22,723,450
5	15,773,231	23,455,879	25,709,712	37,500,588	-5,252,157
6	-32,157,418	-27,335,395	-4,469,273	2,021,424	-5,564,452
7	-20,460,359	-22,647,966	-16,267,502	-35,026,912	-8,444,355
8	9,287,518	8,631,383	-3,046,331	-6,021,506	-9,307,457
9	17,136,402	13,450,215	6,731,664	8,806,409	5,460,363
10	3,102,240	0	4,746,246	0	544,601
11	0	0	0	0	0
12	0	0	0	0	0
	27,996,000	16,084,073	52,577,158	37,423,482	9,905,835

Months Percentage of Annual Net Income

Month	2015	2016	2017	2018	2019
1	0.0%	0.0%	0.0%	0.0%	0.0%
2	0.0%	0.0%	0.0%	0.0%	0.0%
3	20.1%	0.0%	17.1%	10.5%	98.4%
4	106.1%	127.6%	57.4%	70.1%	229.4%
5	56.3%	145.8%	48.9%	100.2%	-53.0%
6	-114.9%	-170.0%	-8.5%	5.4%	-56.2%
7	-73.1%	-140.8%	-30.9%	-93.6%	-85.2%
8	33.2%	53.7%	-5.8%	-16.1%	-94.0%
9	61.2%	83.6%	12.8%	23.5%	55.1%
10	11.1%	0.0%	9.0%	0.0%	5.5%
11	0.0%	0.0%	0.0%	0.0%	0.0%
12	0.0%	0.0%	0.0%	0.0%	0.0%

Attachment C

Correlation Analysis: Effect of Imports, 2015-2019 Changes

Based on Weekly Dataset. The correlations of percent changes offer 28 observations for the weeks with overlapping data in both 2015 to 2019.

Relationship	Coefficient	Obs	t stat	p-value	Statistically Significant at 99% Confidence?
2015-2019 Change in Import Market Share , 2015-2019 % Change in U.S. Price	***-0.5695***	28	-3.53	0.002	***Yes***
2015-2019 % Change in U.S. Price , 2015-2019 % Change in Import Price	***0.9531***	28	16.06	0.000	***Yes***
Weekly US and Import Prices (in levels)	***0.9029***	132	23.95	0.000	***Yes***

Weekly Market Share

			Import Market Share (% of quantity)				*Percentage Point Change*
Week	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**
1	100.0%	100.0%	100.0%	98.4%	99.8%	99.4%	-0.2%
2	100.0%	100.0%	100.0%	99.2%	99.6%	99.2%	-0.4%
3	100.0%	100.0%	100.0%	98.6%	99.6%	99.4%	-0.4%
4	100.0%	100.0%	100.0%	98.8%	99.3%	99.1%	-0.7%
5	100.0%	100.0%	100.0%	98.6%	99.2%	98.2%	-0.8%
6	100.0%	100.0%	100.0%	97.8%	98.9%	96.4%	-1.1%
7	100.0%	100.0%	100.0%	98.2%	98.9%	96.9%	-1.1%
8	100.0%	100.0%	100.0%	97.5%	98.4%	95.1%	-1.6%
9	100.0%	98.5%	93.6%	97.3%	96.5%	96.1%	-3.5%
10	98.6%	98.2%	84.0%	96.3%	91.8%	93.6%	-6.9%
11	96.0%	96.7%	74.7%	92.8%	91.6%	89.4%	-4.4%
12	86.2%	97.1%	83.1%	93.8%	80.1%	81.2%	-6.0%
13	64.3%	87.6%	45.0%	61.3%	66.8%	70.5%	2.5%
14	46.1%	79.0%	40.1%	51.1%	53.0%	61.7%	6.9%
15	32.6%	61.9%	35.4%	33.6%	43.2%	57.6%	10.7%
16	24.5%	35.8%	30.3%	27.3%	35.3%	53.4%	10.8%
17	14.1%	15.4%	16.2%	21.2%	29.2%	47.3%	15.1%
18	8.3%	7.4%	21.1%	20.9%	25.5%	32.6%	17.2%
19	5.2%	4.6%	16.6%	18.5%	16.3%	19.0%	11.0%
20	4.2%	3.7%	10.1%	19.2%	9.9%	17.0%	5.7%
21	4.7%	3.2%	6.6%	12.8%	5.0%	11.7%	0.3%
22	1.3%	3.9%	3.2%	6.4%	1.9%	9.5%	0.5%
23	2.1%	2.7%	6.2%	4.9%	3.5%	9.1%	1.3%
24	1.3%	7.5%	2.8%	3.6%	2.4%	10.0%	1.2%
25	6.4%	20.1%	1.6%	1.6%	1.6%	8.9%	-4.8%
26	21.1%	33.8%	0.7%	0.8%	4.6%	2.7%	-16.5%
27	34.4%	30.1%	7.1%	12.8%	32.5%	8.3%	-1.9%
28	38.6%	31.7%	28.7%	26.6%	41.8%	10.7%	3.2%
29	41.5%	18.6%	37.7%	31.0%	42.7%	30.6%	1.2%
30	34.6%	21.2%	43.6%	32.8%	40.2%	43.9%	5.6%
31	24.9%	33.6%	45.5%	43.3%	39.5%	32.8%	14.6%
32	32.5%	34.2%	46.8%	43.8%	42.3%	38.4%	9.8%
33	39.6%	28.9%	39.0%	38.1%	37.1%	33.6%	-2.5%
34	47.5%	25.6%	41.8%	50.4%	40.9%	34.9%	-6.6%
35	38.6%	30.6%	30.8%	41.8%	38.0%	61.0%	-0.7%
36	23.2%	36.4%	36.6%	44.4%	28.7%	66.4%	5.4%
37	30.1%	51.4%	31.0%	40.0%	60.0%	69.5%	30.0%
38	29.0%	67.1%	42.5%	44.9%	67.1%	82.3%	38.0%
39	47.4%	79.4%	55.1%	79.2%	67.1%	90.8%	19.7%
40	74.0%	94.5%	77.9%	99.7%	87.7%	96.4%	13.7%
41	91.8%	94.0%	96.6%	99.5%	96.9%	90.9%	5.2%
42	100.0%	99.8%	96.9%	99.7%	98.2%	98.3%	-1.8%
43	100.0%	100.0%	99.5%	99.9%	98.9%	99.7%	-1.1%
44	100.0%	100.0%	100.0%	100.0%	99.7%	n/a	-0.3%
45	100.0%	100.0%	100.0%	100.0%	99.9%	n/a	-0.1%
46	100.0%	100.0%	100.0%	100.0%	99.9%	n/a	-0.1%
47	100.0%	100.0%	100.0%	100.0%	99.9%	n/a	-0.1%
48	100.0%	100.0%	100.0%	100.0%	99.9%	n/a	-0.1%
49	100.0%	100.0%	100.0%	100.0%	99.8%	n/a	-0.2%
50	100.0%	100.0%	99.7%	99.5%	99.8%	n/a	-0.2%
51	100.0%	100.0%	96.3%	99.8%	99.6%	n/a	-0.4%
52	100.0%	100.0%	98.9%	99.9%	99.7%	n/a	-0.3%
53	100.0%	n/a	n/a	n/a	n/a	n/a	n/a

Weekly Prices

	Domestic Price ($/lb)						*%Change*		*Import Price ($/lb)*						*%Change*
Week	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**Week**	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**
1							n/a	1	$3 24	$3.24	$1.76	$3.90	$2.74	$1.63	-15.7%
2							n/a	2	$2 96	$3.34	$1.86	$3.30	$2.46	$1.69	-16.6%
3							n/a	3	$2 96	$3.33	$1.89	$2.90	$2.38	$1.64	-19.7%
4							n/a	4	$3 07	$3.34	$2.25	$2.66	$2.25	$2 01	-26.8%
5							n/a	5	$3.17	$3.21	$2.73	$2.62	$2.20	$2.19	-30.8%
6							n/a	6	$3.19	$3.09	$2.81	$2.54	$2.19	$2 55	-31.1%
7							n/a	7	$3 57	$2.85	$2.82	$2.51	$2.08	$2 82	-41.8%
8							n/a	8	$3.40	$2.50	$2.97	$2.41	$2.05	$3 25	-39.9%
9							n/a	9	$3 36	$2.57	$3.14	$2.33	$2.11	$3 91	-37.3%
10							n/a	10	$3 04	$2.48	$3.65	$2.22	$2.39	$4.19	-21.3%
11			$6.78				n/a	11	$2 83	$3.46	$4.36	$2.31	$2.85	$4 37	0.5%
12				$6.40	$5.47	$5.70	n/a	12	$2.74	$5.87	$5.09	$2.67	$3.60	$4.46	31.4%
13	$6.89		$6.78	$5.97	$5.46	$5.18	-20.8%	13	$3.79	$6.72	$5.56	$4.58	$4.00	$4 39	5.7%
14	$6.77	$8.32	$6 24	$5.24	$4.95	$4.16	-26.8%	14	$5 33	$7.12	$5.56	$4.76	$5.25	$2 93	-1.7%
15	$5.27	$8.23	$5.44	$4.64	$4.45	$2 32	-15.6%	15	$5 38	$8.23	$5.33	$4.05	$4.40	$2.44	-18.2%
16	$4.15	$7.18	$4 32	$3.79	$3.36	$2 52	-19.1%	16	$3 96	$6.81	$4.13	$3.78	$3.36	$2.44	-15.2%
17	$3.95	$5.42	$3.43	$3.67	$2.79	$2.49	-29.4%	17	$3 38	$5.16	$3.78	$3.38	$2.53	$2 36	-25.0%
18	$3.36	$3.75	$3.70	$4.11	$2.39	$2.72	-28.7%	18	$2 98	$3.69	$2.98	$3.33	$2.09	$2 22	-29.9%
19	$2.83	$3.01	$4 23	$4.65	$2.17	$2.76	-23.2%	19	$2.67	$2.71	$3.60	$3.73	$2.00	$2 22	-25.0%
20	$2.80	$2.39	$4 05	$5.13	$2.27	$2.65	-18.9%	20	$2.67		$4.22	$4.22	$2.00	$2 22	-25.0%
21	$2.79	$2.16	$3 55	$4.07	$2.47	$2.70	-11.5%	21				$4.00	$2.00	$2 22	n/a
22	$2.47	$2.03	$2.76	$3.73	$2.44	$2.44	-1.1%	22				$3.28		$2 00	n/a
23	$1.91	$2.10	$2.65	$2.80	$2.51	$2 24	31 8%	23				$3.11		$1 94	n/a
24	$1.49	$1.82	$2 55	$2.37	$2.44	$2 50	64.1%	24						$1 89	n/a
25	$1.77	$1.76	$2 59	$2.31	$2.22	$2.68	25 3%	25		$1.78					n/a
26	$1.70	$1.87	$2.45	$2.18	$2.32	$2.66	36.6%	26	$1 37	$2.00					n/a
27	$1.65	$1.93	$2.71	$2.03	$2.36	$2.73	43 3%	27	$1 25	$1.83			$2.03		62.1%
28	$1.63	$1.77	$2.48	$1.82	$2.32	$2 81	42 0%	28	$1.11	$1.72	$2.66	$1.66	$2.03		82.4%
29	$1.77	$1.89	$1 97	$1.65	$2.17	$2.73	22 9%	29	$1 21	$1.86	$1.85	$1.47	$2.00	$1 89	64.8%
30	$1.94	$2.20	$1 91	$1.67	$2.05	$2 53	6 0%	30	$1.49	$2.05	$1.63	$1.17	$2.00	$1 95	34.4%
31	$2.23	$2.40	$2 08	$1.64	$2.05	$2 51	-8.1%	31	$1.79	$2.28	$1.83	$1.34	$1.88	$2 00	5.2%
32	$2.67	$2.76	$2 52	$2.15	$2.13	$2 23	-20.3%	32	$2 22	$2.66	$2.31	$1.76	$1.97	$1 83	-11.3%
33	$3.19	$3.42	$2 87	$2.64	$2.06	$2 09	-35.5%	33	$2.62	$3.00	$2.48	$2.03	$1.61	$1.79	-38.5%
34	$3.52	$3.83	$2 92	$3.10	$2.24	$2 20	-36.2%	34	$2 92	$3.00	$2.56	$2.34	$1.71	$1.73	-41.4%
35	$3.84	$3.99	$3 22	$3.30	$2.59	$2 50	-32.5%	35	$3 00	$3.43	$2.56	$2.69	$2.43	$2.10	-19.1%
36	$4.12	$4.48	$3 53	$3.55	$3.04	$2.67	-26.1%	36	$3 56		$3.06	$2.94	$2.44	$2 52	-31.3%
37	$4.89	$5.73	$3.46	$3.67	$3.02	$2 99	-38.2%	37			$3.00	$3.89	$3.70	$2.77	n/a
38	$5.88	$6.23	$3 50	$4.16	$2.99	$3 90	-49.1%	38				$4.69	$3.93	$3 22	n/a
39	$6.36		$4 86	$4.16	$2.95	$4.61	-53.7%	39	$7 39	$8.36	$5.87	$5.17	$3.93	$3 56	-46.8%
40	$6.67		$5.45		$2.95	$4 22	-55.8%	40	$7 30	$8.16	$6.00	$5.96	$3.98	$3 92	-45.5%
41							n/a	41	$7 56	$6.48	$5.09	$6.60	$3.88	$4.40	-48.7%
42							n/a	42	$8 30	$5.29	$4.51	$5.82	$3.77	$4.11	-54.6%
43							n/a	43	$8 35	$4.29	$4.25	$5.36	$3.83	$3 96	-54.1%
44							n/a	44	$7.73	$3.90	$4.41	$4.14	$3.44		-55.5%
45							n/a	45	$7 20	$3.84	$4.36	$3.05	$3.35		-53.4%
46							n/a	46	$6.69	$4.05	$4.48	$2.86	$3.23		-51.7%
47							n/a	47	$6.10	$3.92	$5.48	$2.53	$3.16		-48.2%
48							n/a	48	$5 81	$3.98	$5.21	$3.00	$3.15		-45.9%
49							n/a	49	$5 37	$3.74	$5.14	$3.47	$2.83		-47.3%
50							n/a	50	$5 03	$3.02	$5.43	$3.61	$2.35		-53.2%
51							n/a	51	$4 08	$2.28	$4.69	$3.39	$2.09		-48.8%
52							n/a	52	$3.43	$1.82	$4.89	$2.89	$1.76		-48.5%
53							n/a	53	$3.44						n/a

Weekly Volume, Price, and Revenue Data, Jan 2015 - Oct 2020

Sources: Agronometrics, USITC DataWeb, and Table IV-3. See Data Explanation.

Notes: For analysis, the year is based on the Agronometrics week number and not necessarily the year of the report. For example, 2015 Week 53 was reported in 2016. U.S. revenue can only be estimated for weeks with price observations in the Shipping Point dataset. Three missing U.S. weekly price observations are estimated based on proximate prices, as explained in the Data Explanation.

			pounds	*$/lb*	*$*				
status	**Year/Week**	**Date**	**Quantity**	**Price**	**Revenue**	**Year**	**Month**	**Day**	**Week**
USA	2015_01	1/4/2015	0		0	2015	1	4	1
USA	2015_02	1/11/2015	0		0	2015	1	11	2
USA	2015_03	1/18/2015	0		0	2015	1	18	3
USA	2015_04	1/25/2015	0		0	2015	1	25	4
USA	2015_05	2/1/2015	0		0	2015	2	1	5
USA	2015_06	2/8/2015	0		0	2015	2	8	6
USA	2015_07	2/15/2015	0		0	2015	2	15	7
USA	2015_08	2/22/2015	0		0	2015	2	22	8
USA	2015_09	3/1/2015	0		0	2015	3	1	9
USA	2015_10	3/8/2015	66,068		0	2015	3	8	10
USA	2015_11	3/15/2015	169,889		0	2015	3	15	11
USA	2015_12	3/22/2015	490,789		0	2015	3	22	12
USA	2015_13	3/29/2015	1,255,288	6.89	8,654,859	2015	3	29	13
USA	2015_14	4/5/2015	2,520,014	6.77	17,061,588	2015	4	5	14
USA	2015_15	4/12/2015	4,539,801	5.27	23,939,750	2015	4	12	15
USA	2015_16	4/19/2015	6,229,248	4.15	25,840,872	2015	4	19	16
USA	2015_17	4/26/2015	7,965,887	3.95	31,475,290	2015	4	26	17
USA	2015_18	5/3/2015	10,712,419	3.36	35,942,776	2015	5	3	18
USA	2015_19	5/10/2015	13,525,019	2.83	38,276,612	2015	5	10	19
USA	2015_20	5/17/2015	12,316,923	2.80	34,453,776	2015	5	17	20
USA	2015_21	5/24/2015	10,580,284	2.79	29,562,750	2015	5	24	21
USA	2015_22	5/31/2015	15,478,738	2.47	38,238,004	2015	5	31	22
USA	2015_23	6/7/2015	16,432,002	1.91	31,310,442	2015	6	7	23
USA	2015_24	6/14/2015	15,903,459	1.49	23,619,558	2015	6	14	24
USA	2015_25	6/21/2015	19,754,267	1.77	34,978,324	2015	6	21	25
USA	2015_26	6/28/2015	20,216,742	1.70	34,395,036	2015	6	28	26
USA	2015_27	7/5/2015	15,563,682	1.65	25,617,716	2015	7	5	27
USA	2015_28	7/12/2015	11,882,763	1.63	19,372,046	2015	7	12	28
USA	2015_29	7/19/2015	9,277,805	1.77	16,376,153	2015	7	19	29
USA	2015_30	7/26/2015	9,768,594	1.94	18,902,836	2015	7	26	30
USA	2015_31	8/2/2015	8,173,529	2.23	18,244,792	2015	8	2	31
USA	2015_32	8/9/2015	7,295,771	2.67	19,509,602	2015	8	9	32
USA	2015_33	8/16/2015	5,323,176	3.19	16,960,586	2015	8	16	33
USA	2015_34	8/23/2015	4,237,776	3.52	14,899,774	2015	8	23	34
USA	2015_35	8/30/2015	3,982,944	3.84	15,280,489	2015	8	30	35
USA	2015_36	9/6/2015	3,945,191	4.12	16,250,772	2015	9	6	36
USA	2015_37	9/13/2015	3,114,624	4.89	15,237,706	2015	9	13	37
USA	2015_38	9/20/2015	2,066,978	5.88	12,144,142	2015	9	20	38
USA	2015_39	9/27/2015	1,396,862	6.36	8,886,550	2015	9	27	39
USA	2015_40	10/4/2015	934,387	6.67	6,234,658	2015	10	4	40
USA	2015_41	10/11/2015	217,080		0	2015	10	11	41
USA	2015_42	10/18/2015	0		0	2015	10	18	42
USA	2015_43	10/25/2015	0		0	2015	10	25	43

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
USA	2015_44	11/1/2015	0		0	2015	11	1	44
USA	2015_45	11/8/2015	0		0	2015	11	8	45
USA	2015_46	11/15/2015	0		0	2015	11	15	46
USA	2015_47	11/22/2015	0		0	2015	11	22	47
USA	2015_48	11/29/2015	0		0	2015	11	29	48
USA	2015_49	12/6/2015	0		0	2015	12	6	49
USA	2015_50	12/13/2015	0		0	2015	12	13	50
USA	2015_51	12/20/2015	0		0	2015	12	20	51
USA	2015_52	12/27/2015	0		0	2015	12	27	52
USA	2015_53	1/3/2016	0		0	2015	1	3	53
USA	2016_01	1/10/2016	0		0	2016	1	10	1
USA	2016_02	1/17/2016	0		0	2016	1	17	2
USA	2016_03	1/24/2016	0		0	2016	1	24	3
USA	2016_04	1/31/2016	0		0	2016	1	31	4
USA	2016_05	2/7/2016	0		0	2016	2	7	5
USA	2016_06	2/14/2016	0		0	2016	2	14	6
USA	2016_07	2/21/2016	0		0	2016	2	21	7
USA	2016_08	2/28/2016	0		0	2016	2	28	8
USA	2016_09	3/6/2016	91,736		0	2016	3	6	9
USA	2016_10	3/13/2016	110,083		0	2016	3	13	10
USA	2016_11	3/20/2016	137,604		0	2016	3	20	11
USA	2016_12	3/27/2016	137,604		0	2016	3	27	12
USA	2016_13	4/3/2016	284,381		0	2016	4	3	13
USA	2016_14	4/10/2016	724,714	8.32	6,027,595	2016	4	10	14
USA	2016_15	4/17/2016	1,495,295	8.23	12,306,002	2016	4	17	15
USA	2016_16	4/24/2016	3,559,353	7.18	25,542,712	2016	4	24	16
USA	2016_17	5/1/2016	6,981,101	5.42	37,862,772	2016	5	1	17
USA	2016_18	5/8/2016	11,090,870	3.75	41,581,676	2016	5	8	18
USA	2016_19	5/15/2016	14,375,015	3.01	43,225,000	2016	5	15	19
USA	2016_20	5/22/2016	17,356,431	2.39	41,398,816	2016	5	22	20
USA	2016_21	5/29/2016	17,494,035	2.16	37,863,760	2016	5	29	21
USA	2016_22	6/5/2016	15,228,158	2.03	30,969,306	2016	6	5	22
USA	2016_23	6/12/2016	15,659,317	2.10	32,817,018	2016	6	12	23
USA	2016_24	6/19/2016	18,833,379	1.82	34,339,136	2016	6	19	24
USA	2016_25	6/26/2016	23,034,883	1.76	40,526,756	2016	6	26	25
USA	2016_26	7/3/2016	15,631,796	1.87	29,258,638	2016	7	3	26
USA	2016_27	7/10/2016	11,769,715	1.93	22,659,258	2016	7	10	27
USA	2016_28	7/17/2016	11,164,258	1.77	19,721,286	2016	7	17	28
USA	2016_29	7/24/2016	12,668,727	1.89	23,957,738	2016	7	24	29
USA	2016_30	7/31/2016	11,191,779	2.20	24,589,412	2016	7	31	30
USA	2016_31	8/7/2016	9,384,582	2.40	22,491,620	2016	8	7	31
USA	2016_32	8/14/2016	6,577,464	2.76	18,144,228	2016	8	14	32
USA	2016_33	8/21/2016	5,357,376	3.42	18,315,370	2016	8	21	33
USA	2016_34	8/28/2016	5,045,474	3.83	19,315,698	2016	8	28	34
USA	2016_35	9/4/2016	3,678,609	3.99	14,676,644	2016	9	4	35
USA	2016_36	9/11/2016	2,394,307	4.48	10,730,437	2016	9	11	36
USA	2016_37	9/18/2016	1,880,586	5.73	10,777,538	2016	9	18	37
USA	2016_38	9/25/2016	1,018,268	6.23	6,341,702	2016	9	25	38
USA	2016_39	10/2/2016	761,408		0	2016	10	2	39
USA	2016_40	10/9/2016	165,125		0	2016	10	9	40
USA	2016_41	10/16/2016	284,381		0	2016	10	16	41
USA	2016_42	10/23/2016	9,174		0	2016	10	23	42

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
USA	2016_43	10/30/2016	0		0	2016	10	30	43
USA	2016_44	11/6/2016	0		0	2016	11	6	44
USA	2016_45	11/13/2016	0		0	2016	11	13	45
USA	2016_46	11/20/2016	0		0	2016	11	20	46
USA	2016_47	11/27/2016	0		0	2016	11	27	47
USA	2016_48	12/4/2016	0		0	2016	12	4	48
USA	2016_49	12/11/2016	0		0	2016	12	11	49
USA	2016_50	12/18/2016	0		0	2016	12	18	50
USA	2016_51	12/25/2016	0		0	2016	12	25	51
USA	2016_52	1/1/2017	0		0	2016	1	1	52
USA	2017_01	1/8/2017	0		0	2017	1	8	1
USA	2017_02	1/15/2017	0		0	2017	1	15	2
USA	2017_03	1/22/2017	0		0	2017	1	22	3
USA	2017_04	1/29/2017	0		0	2017	1	29	4
USA	2017_05	2/5/2017	0		0	2017	2	5	5
USA	2017_06	2/12/2017	0		0	2017	2	12	6
USA	2017_07	2/19/2017	0		0	2017	2	19	7
USA	2017_08	2/26/2017	0		0	2017	2	26	8
USA	2017_09	3/5/2017	487,449		0	2017	3	5	9
USA	2017_10	3/12/2017	996,092		0	2017	3	12	10
USA	2017_11	3/19/2017	1,716,670	6.78	0	2017	3	19	11
USA	2017_12	3/26/2017	837,141		0	2017	3	26	12
USA	2017_13	4/2/2017	2,490,231	6.78	16,877,804	2017	4	2	13
USA	2017_14	4/9/2017	4,016,160	6.24	25,043,734	2017	4	9	14
USA	2017_15	4/16/2017	5,097,026	5.44	27,744,076	2017	4	16	15
USA	2017_16	4/23/2017	6,771,309	4.32	29,282,870	2017	4	23	16
USA	2017_17	4/30/2017	9,558,248	3.43	32,747,448	2017	4	30	17
USA	2017_18	5/7/2017	9,049,605	3.70	33,473,010	2017	5	7	18
USA	2017_19	5/14/2017	8,742,300	4.23	37,017,040	2017	5	14	19
USA	2017_20	5/21/2017	13,214,119	4.05	53,510,964	2017	5	21	20
USA	2017_21	5/28/2017	10,840,452	3.55	38,467,728	2017	5	28	21
USA	2017_22	6/4/2017	14,104,244	2.76	38,972,852	2017	6	4	22
USA	2017_23	6/11/2017	13,267,102	2.65	35,102,644	2017	6	11	23
USA	2017_24	6/18/2017	14,581,097	2.55	37,232,076	2017	6	18	24
USA	2017_25	6/25/2017	12,811,443	2.59	33,135,510	2017	6	25	25
USA	2017_26	7/2/2017	14,506,919	2.45	35,474,828	2017	7	2	26
USA	2017_27	7/9/2017	14,453,936	2.71	39,126,340	2017	7	9	27
USA	2017_28	7/16/2017	14,941,385	2.48	37,108,716	2017	7	16	28
USA	2017_29	7/23/2017	11,666,997	1.97	23,015,150	2017	7	23	29
USA	2017_30	7/30/2017	10,416,583	1.91	19,850,992	2017	7	30	30
USA	2017_31	8/6/2017	7,121,001	2.08	14,776,431	2017	8	6	31
USA	2017_32	8/13/2017	7,099,807	2.52	17,904,352	2017	8	13	32
USA	2017_33	8/20/2017	6,453,407	2.87	18,494,586	2017	8	20	33
USA	2017_34	8/27/2017	6,898,469	2.92	20,125,214	2017	8	27	34
USA	2017_35	9/3/2017	6,135,505	3.22	19,781,302	2017	9	3	35
USA	2017_36	9/10/2017	4,991,058	3.53	17,639,026	2017	9	10	36
USA	2017_37	9/17/2017	4,620,173	3.46	15,970,709	2017	9	17	37
USA	2017_38	9/24/2017	3,486,323	3.50	12,185,980	2017	9	24	38
USA	2017_39	10/1/2017	2,129,942	4.86	10,356,973	2017	10	1	39
USA	2017_40	10/8/2017	1,186,833	5.45	6,467,622	2017	10	8	40
USA	2017_41	10/15/2017	190,741		0	2017	10	15	41
USA	2017_42	10/22/2017	169,548		0	2017	10	22	42

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
USA	2017_43	10/29/2017	31,790		0	2017	10	29	43
USA	2017_44	11/5/2017	0		0	2017	11	5	44
USA	2017_45	11/12/2017	0		0	2017	11	12	45
USA	2017_46	11/19/2017	0		0	2017	11	19	46
USA	2017_47	11/26/2017	0		0	2017	11	26	47
USA	2017_48	12/3/2017	0		0	2017	12	3	48
USA	2017_49	12/10/2017	0		0	2017	12	10	49
USA	2017_50	12/17/2017	21,193		0	2017	12	17	50
USA	2017_51	12/24/2017	264,918		0	2017	12	24	51
USA	2017_52	12/31/2017	84,774		0	2017	12	31	52
USA	2018_01	1/7/2018	173,204		0	2018	1	7	1
USA	2018_02	1/14/2018	160,832		0	2018	1	14	2
USA	2018_03	1/21/2018	222,690		0	2018	1	21	3
USA	2018_04	1/28/2018	160,832		0	2018	1	28	4
USA	2018_05	2/4/2018	210,319		0	2018	2	4	5
USA	2018_06	2/11/2018	296,920		0	2018	2	11	6
USA	2018_07	2/18/2018	321,664		0	2018	2	18	7
USA	2018_08	2/25/2018	272,177		0	2018	2	25	8
USA	2018_09	3/4/2018	222,690		0	2018	3	4	9
USA	2018_10	3/11/2018	321,664		0	2018	3	11	10
USA	2018_11	3/18/2018	581,469		0	2018	3	18	11
USA	2018_12	3/25/2018	754,673	6.40	4,830,128	2018	3	25	12
USA	2018_13	4/1/2018	2,152,673	5.97	12,844,254	2018	4	1	13
USA	2018_14	4/8/2018	3,785,735	5.24	19,847,122	2018	4	8	14
USA	2018_15	4/15/2018	6,099,239	4.64	28,272,038	2018	4	15	15
USA	2018_16	4/22/2018	7,299,292	3.79	27,669,686	2018	4	22	16
USA	2018_17	4/29/2018	9,847,859	3.67	36,107,152	2018	4	29	17
USA	2018_18	5/6/2018	9,711,770	4.11	39,920,104	2018	5	6	18
USA	2018_19	5/13/2018	9,402,478	4.65	43,710,988	2018	5	13	19
USA	2018_20	5/20/2018	8,066,337	5.13	41,386,360	2018	5	20	20
USA	2018_21	5/27/2018	10,404,585	4.07	42,315,260	2018	5	27	21
USA	2018_22	6/3/2018	11,381,947	3.73	42,419,628	2018	6	3	22
USA	2018_23	6/10/2018	12,804,691	2.80	35,793,136	2018	6	10	23
USA	2018_24	6/17/2018	14,041,859	2.37	33,256,124	2018	6	17	24
USA	2018_25	6/24/2018	17,493,558	2.31	40,414,720	2018	6	24	25
USA	2018_26	7/1/2018	22,293,771	2.18	48,665,040	2018	7	1	26
USA	2018_27	7/8/2018	19,002,903	2.03	38,626,304	2018	7	8	27
USA	2018_28	7/15/2018	16,726,514	1.82	30,386,824	2018	7	15	28
USA	2018_29	7/22/2018	15,241,912	1.65	25,204,588	2018	7	22	29
USA	2018_30	7/29/2018	10,911,823	1.67	18,186,260	2018	7	29	30
USA	2018_31	8/5/2018	8,412,744	1.64	13,831,446	2018	8	5	31
USA	2018_32	8/12/2018	9,241,646	2.15	19,827,268	2018	8	12	32
USA	2018_33	8/19/2018	7,893,133	2.64	20,834,906	2018	8	19	33
USA	2018_34	8/26/2018	6,074,496	3.10	18,828,078	2018	8	26	34
USA	2018_35	9/2/2018	5,814,691	3.30	19,193,978	2018	9	2	35
USA	2018_36	9/9/2018	4,676,496	3.55	16,611,222	2018	9	9	36
USA	2018_37	9/16/2018	3,402,213	3.67	12,471,033	2018	9	16	37
USA	2018_38	9/23/2018	1,880,496	4.16	7,818,533	2018	9	23	38
USA	2018_39	9/30/2018	1,125,823	4.16	0	2018	9	30	39
USA	2018_40	10/7/2018	24,743		0	2018	10	7	40
USA	2018_41	10/14/2018	24,743		0	2018	10	14	41
USA	2018_42	10/21/2018	24,743		0	2018	10	21	42

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
USA	2018_43	10/28/2018	12,372		0	2018	10	28	43
USA	2018_44	11/4/2018	0		0	2018	11	4	44
USA	2018_45	11/11/2018	0		0	2018	11	11	45
USA	2018_46	11/18/2018	0		0	2018	11	18	46
USA	2018_47	11/25/2018	0		0	2018	11	25	47
USA	2018_48	12/2/2018	0		0	2018	12	2	48
USA	2018_49	12/9/2018	0		0	2018	12	9	49
USA	2018_50	12/16/2018	49,487		0	2018	12	16	50
USA	2018_51	12/23/2018	24,743		0	2018	12	23	51
USA	2018_52	12/30/2018	12,372		0	2018	12	30	52
USA	2019_01	1/6/2019	34,196		0	2019	1	6	1
USA	2019_02	1/13/2019	79,791		0	2019	1	13	2
USA	2019_03	1/20/2019	68,392		0	2019	1	20	3
USA	2019_04	1/27/2019	102,588		0	2019	1	27	4
USA	2019_05	2/3/2019	125,386		0	2019	2	3	5
USA	2019_06	2/10/2019	170,981		0	2019	2	10	6
USA	2019_07	2/17/2019	170,981		0	2019	2	17	7
USA	2019_08	2/24/2019	205,177		0	2019	2	24	8
USA	2019_09	3/3/2019	284,968		0	2019	3	3	9
USA	2019_10	3/10/2019	490,145		0	2019	3	10	10
USA	2019_11	3/17/2019	740,916		0	2019	3	17	11
USA	2019_12	3/24/2019	1,242,460	5.47	6,792,571	2019	3	24	12
USA	2019_13	3/31/2019	2,587,508	5.46	14,130,941	2019	3	31	13
USA	2019_14	4/7/2019	4,536,688	4.95	22,472,188	2019	4	7	14
USA	2019_15	4/14/2019	7,773,923	4.45	34,586,268	2019	4	14	15
USA	2019_16	4/21/2019	8,697,218	3.36	29,200,428	2019	4	21	16
USA	2019_17	4/28/2019	10,578,006	2.79	29,510,600	2019	4	28	17
USA	2019_18	5/5/2019	10,612,202	2.39	25,385,850	2019	5	5	18
USA	2019_19	5/12/2019	12,139,630	2.17	26,382,888	2019	5	12	19
USA	2019_20	5/19/2019	14,647,347	2.27	33,225,824	2019	5	19	20
USA	2019_21	5/26/2019	15,433,858	2.47	38,174,080	2019	5	26	21
USA	2019_22	6/2/2019	16,140,578	2.44	39,421,828	2019	6	2	22
USA	2019_23	6/9/2019	16,915,691	2.51	42,485,024	2019	6	9	23
USA	2019_24	6/16/2019	17,303,247	2.44	42,179,468	2019	6	16	24
USA	2019_25	6/23/2019	16,961,286	2.22	37,632,264	2019	6	23	25
USA	2019_26	6/30/2019	17,383,038	2.32	40,402,548	2019	6	30	26
USA	2019_27	7/7/2019	14,282,588	2.36	33,697,604	2019	7	7	27
USA	2019_28	7/14/2019	12,151,029	2.32	28,136,686	2019	7	14	28
USA	2019_29	7/21/2019	11,980,048	2.17	25,985,788	2019	7	21	29
USA	2019_30	7/28/2019	13,154,115	2.05	26,993,584	2019	7	28	30
USA	2019_31	8/4/2019	11,524,099	2.05	23,644,878	2019	8	4	31
USA	2019_32	8/11/2019	10,703,392	2.13	22,815,812	2019	8	11	32
USA	2019_33	8/18/2019	9,415,337	2.06	19,358,988	2019	8	18	33
USA	2019_34	8/25/2019	8,378,054	2.24	18,798,832	2019	8	25	34
USA	2019_35	9/1/2019	7,363,569	2.59	19,074,020	2019	9	1	35
USA	2019_36	9/8/2019	5,733,553	3.04	17,455,048	2019	9	8	36
USA	2019_37	9/15/2019	4,194,727	3.02	12,677,955	2019	9	15	37
USA	2019_38	9/22/2019	3,146,045	2.99	9,415,176	2019	9	22	38
USA	2019_39	9/29/2019	2,701,495	2.95	7,965,089	2019	9	29	39
USA	2019_40	10/6/2019	1,345,048	2.95	0	2019	10	6	40
USA	2019_41	10/13/2019	353,360		0	2019	10	13	41
USA	2019_42	10/20/2019	125,386		0	2019	10	20	42

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
USA	2019_43	10/27/2019	125,386		0	2019	10	27	43
USA	2019_44	11/3/2019	34,196		0	2019	11	3	44
USA	2019_45	11/10/2019	11,399		0	2019	11	10	45
USA	2019_46	11/17/2019	11,399		0	2019	11	17	46
USA	2019_47	11/24/2019	11,399		0	2019	11	24	47
USA	2019_48	12/1/2019	11,399		0	2019	12	1	48
USA	2019_49	12/8/2019	22,797		0	2019	12	8	49
USA	2019_50	12/15/2019	34,196		0	2019	12	15	50
USA	2019_51	12/22/2019	34,196		0	2019	12	22	51
USA	2019_52	12/29/2019	45,595		0	2019	12	29	52
USA	2020_01	1/5/2020	72,732		0	2020	1	5	1
USA	2020_02	1/12/2020	118,190		0	2020	1	12	2
USA	2020_03	1/19/2020	136,373		0	2020	1	19	3
USA	2020_04	1/26/2020	100,007		0	2020	1	26	4
USA	2020_05	2/2/2020	263,655		0	2020	2	2	5
USA	2020_06	2/9/2020	454,578		0	2020	2	9	6
USA	2020_07	2/16/2020	363,662		0	2020	2	16	7
USA	2020_08	2/23/2020	490,944		0	2020	2	23	8
USA	2020_09	3/1/2020	345,479		0	2020	3	1	9
USA	2020_10	3/8/2020	572,768		0	2020	3	8	10
USA	2020_11	3/15/2020	800,057		0	2020	3	15	11
USA	2020_12	3/22/2020	1,454,649	5.70	8,294,571	2020	3	22	12
USA	2020_13	3/29/2020	2,600,185	5.18	13,477,360	2020	3	29	13
USA	2020_14	4/5/2020	3,391,150	4.16	14,119,072	2020	4	5	14
USA	2020_15	4/12/2020	4,482,137	2.32	10,419,058	2020	4	12	15
USA	2020_16	4/19/2020	5,827,687	2.52	14,676,746	2020	4	19	16
USA	2020_17	4/26/2020	6,791,391	2.49	16,918,754	2020	4	26	17
USA	2020_18	5/3/2020	8,346,047	2.72	22,704,410	2020	5	3	18
USA	2020_19	5/10/2020	9,237,020	2.76	25,465,832	2020	5	10	19
USA	2020_20	5/17/2020	10,264,365	2.65	27,216,664	2020	5	17	20
USA	2020_21	5/24/2020	12,300,874	2.70	33,266,214	2020	5	24	21
USA	2020_22	5/31/2020	13,273,670	2.44	32,432,108	2020	5	31	22
USA	2020_23	6/7/2020	13,955,537	2.24	31,287,234	2020	6	7	23
USA	2020_24	6/14/2020	9,146,104	2.50	22,889,262	2020	6	14	24
USA	2020_25	6/21/2020	7,136,871	2.68	19,125,962	2020	6	21	25
USA	2020_26	6/28/2020	15,182,897	2.66	40,372,076	2020	6	28	26
USA	2020_27	7/5/2020	17,737,624	2.73	48,504,648	2020	7	5	27
USA	2020_28	7/12/2020	13,991,903	2.81	39,375,124	2020	7	12	28
USA	2020_29	7/19/2020	14,964,699	2.73	40,811,880	2020	7	19	29
USA	2020_30	7/26/2020	12,600,895	2.53	31,821,624	2020	7	26	30
USA	2020_31	8/2/2020	9,837,062	2.51	24,674,034	2020	8	2	31
USA	2020_32	8/9/2020	6,991,406	2.23	15,615,521	2020	8	9	32
USA	2020_33	8/16/2020	7,755,096	2.09	16,216,038	2020	8	16	33
USA	2020_34	8/23/2020	7,582,357	2.20	16,700,646	2020	8	23	34
USA	2020_35	8/30/2020	6,764,117	2.50	16,933,116	2020	8	30	35
USA	2020_36	9/6/2020	5,709,496	2.67	15,223,744	2020	9	6	36
USA	2020_37	9/13/2020	3,100,220	2.99	9,274,872	2020	9	13	37
USA	2020_38	9/20/2020	2,018,325	3.90	7,868,347	2020	9	20	38
USA	2020_39	9/27/2020	772,782	4.61	3,560,116	2020	9	27	39
USA	2020_40	10/4/2020	663,684	4.22	2,802,746	2020	10	4	40
USA	2020_41	10/11/2020	363,662		0	2020	10	11	41
USA	2020_42	10/18/2020	209,106		0	2020	10	18	42

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
USA	2020_43	10/25/2020	72,732		0	2020	10	25	43
Imports	2015_01	1/4/2015	6,462,583	3.24	n/a	2015	1	4	1
Imports	2015_02	1/11/2015	10,862,227	2.96	n/a	2015	1	11	2
Imports	2015_03	1/18/2015	14,274,869	2.96	n/a	2015	1	18	3
Imports	2015_04	1/25/2015	11,225,473	3.07	n/a	2015	1	25	4
Imports	2015_05	2/1/2015	9,423,726	3.17	n/a	2015	2	1	5
Imports	2015_06	2/8/2015	8,913,390	3.19	n/a	2015	2	8	6
Imports	2015_07	2/15/2015	7,395,828	3.57	n/a	2015	2	15	7
Imports	2015_08	2/22/2015	8,603,813	3.40	n/a	2015	2	22	8
Imports	2015_09	3/1/2015	5,346,976	3.36	n/a	2015	3	1	9
Imports	2015_10	3/8/2015	4,805,284	3.04	n/a	2015	3	8	10
Imports	2015_11	3/15/2015	4,078,085	2.83	n/a	2015	3	15	11
Imports	2015_12	3/22/2015	3,053,512	2.74	n/a	2015	3	22	12
Imports	2015_13	3/29/2015	2,265,447	3.79	n/a	2015	3	29	13
Imports	2015_14	4/5/2015	2,152,595	5.33	n/a	2015	4	5	14
Imports	2015_15	4/12/2015	2,193,925	5.38	n/a	2015	4	12	15
Imports	2015_16	4/19/2015	2,018,095	3.96	n/a	2015	4	19	16
Imports	2015_17	4/26/2015	1,308,239	3.38	n/a	2015	4	26	17
Imports	2015_18	5/3/2015	968,762	2.98	n/a	2015	5	3	18
Imports	2015_19	5/10/2015	744,512	2.67	n/a	2015	5	10	19
Imports	2015_20	5/17/2015	538,201	2.67	n/a	2015	5	17	20
Imports	2015_21	5/24/2015	520,261		n/a	2015	5	24	21
Imports	2015_22	5/31/2015	206,310		n/a	2015	5	31	22
Imports	2015_23	6/7/2015	358,774		n/a	2015	6	7	23
Imports	2015_24	6/14/2015	203,305		n/a	2015	6	14	24
Imports	2015_25	6/21/2015	1,355,629		n/a	2015	6	21	25
Imports	2015_26	6/28/2015	5,404,270	1.37	n/a	2015	6	28	26
Imports	2015_27	7/5/2015	8,172,698	1.25	n/a	2015	7	5	27
Imports	2015_28	7/12/2015	7,463,088	1.11	n/a	2015	7	12	28
Imports	2015_29	7/19/2015	6,581,728	1.21	n/a	2015	7	19	29
Imports	2015_30	7/26/2015	5,176,314	1.49	n/a	2015	7	26	30
Imports	2015_31	8/2/2015	2,713,227	1.79	n/a	2015	8	2	31
Imports	2015_32	8/9/2015	3,509,387	2.22	n/a	2015	8	9	32
Imports	2015_33	8/16/2015	3,488,949	2.62	n/a	2015	8	16	33
Imports	2015_34	8/23/2015	3,838,077	2.92	n/a	2015	8	23	34
Imports	2015_35	8/30/2015	2,508,639	3.00	n/a	2015	8	30	35
Imports	2015_36	9/6/2015	1,192,752	3.56	n/a	2015	9	6	36
Imports	2015_37	9/13/2015	1,338,051		n/a	2015	9	13	37
Imports	2015_38	9/20/2015	846,152		n/a	2015	9	20	38
Imports	2015_39	9/27/2015	1,257,840	7.39	n/a	2015	9	27	39
Imports	2015_40	10/4/2015	2,660,386	7.30	n/a	2015	10	4	40
Imports	2015_41	10/11/2015	2,418,737	7.56	n/a	2015	10	11	41
Imports	2015_42	10/18/2015	3,668,891	8.30	n/a	2015	10	18	42
Imports	2015_43	10/25/2015	3,762,493	8.35	n/a	2015	10	25	43
Imports	2015_44	11/1/2015	2,581,894	7.73	n/a	2015	11	1	44
Imports	2015_45	11/8/2015	2,376,068	7.20	n/a	2015	11	8	45
Imports	2015_46	11/15/2015	2,174,314	6.69	n/a	2015	11	15	46
Imports	2015_47	11/22/2015	7,250,043	6.10	n/a	2015	11	22	47
Imports	2015_48	11/29/2015	2,894,061	5.81	n/a	2015	11	29	48
Imports	2015_49	12/6/2015	3,800,964	5.37	n/a	2015	12	6	49
Imports	2015_50	12/13/2015	6,211,002	5.03	n/a	2015	12	13	50
Imports	2015_51	12/20/2015	5,598,664	4.08	n/a	2015	12	20	51

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
Imports	2015_52	12/27/2015	10,012,348	3.43	n/a	2015	12	27	52
Imports	2015_53	1/3/2016	4,337,936	3.44	n/a	2015	1	3	53
Imports	2016_01	1/10/2016	12,511,985	3.24	n/a	2016	1	10	1
Imports	2016_02	1/17/2016	10,089,402	3.34	n/a	2016	1	17	2
Imports	2016_03	1/24/2016	8,723,676	3.33	n/a	2016	1	24	3
Imports	2016_04	1/31/2016	13,006,427	3.34	n/a	2016	1	31	4
Imports	2016_05	2/7/2016	13,375,781	3.21	n/a	2016	2	7	5
Imports	2016_06	2/14/2016	13,557,607	3.09	n/a	2016	2	14	6
Imports	2016_07	2/21/2016	13,640,641	2.85	n/a	2016	2	21	7
Imports	2016_08	2/28/2016	10,172,718	2.50	n/a	2016	2	28	8
Imports	2016_09	3/6/2016	5,857,697	2.57	n/a	2016	3	6	9
Imports	2016_10	3/13/2016	5,875,806	2.48	n/a	2016	3	13	10
Imports	2016_11	3/20/2016	4,094,673	3.46	n/a	2016	3	20	11
Imports	2016_12	3/27/2016	4,537,929	5.87	n/a	2016	3	27	12
Imports	2016_13	4/3/2016	2,010,873	6.72	n/a	2016	4	3	13
Imports	2016_14	4/10/2016	2,733,116	7.12	n/a	2016	4	10	14
Imports	2016_15	4/17/2016	2,424,485	8.23	n/a	2016	4	17	15
Imports	2016_16	4/24/2016	1,984,880	6.81	n/a	2016	4	24	16
Imports	2016_17	5/1/2016	1,269,654	5.16	n/a	2016	5	1	17
Imports	2016_18	5/8/2016	886,972	3.69	n/a	2016	5	8	18
Imports	2016_19	5/15/2016	694,948	2.71	n/a	2016	5	15	19
Imports	2016_20	5/22/2016	667,515		n/a	2016	5	22	20
Imports	2016_21	5/29/2016	585,219		n/a	2016	5	29	21
Imports	2016_22	6/5/2016	612,545		n/a	2016	6	5	22
Imports	2016_23	6/12/2016	435,849		n/a	2016	6	12	23
Imports	2016_24	6/19/2016	1,537,765		n/a	2016	6	19	24
Imports	2016_25	6/26/2016	5,778,380	1.78	n/a	2016	6	26	25
Imports	2016_26	7/3/2016	7,992,565	2.00	n/a	2016	7	3	26
Imports	2016_27	7/10/2016	5,067,726	1.83	n/a	2016	7	10	27
Imports	2016_28	7/17/2016	5,176,843	1.72	n/a	2016	7	17	28
Imports	2016_29	7/24/2016	2,897,262	1.86	n/a	2016	7	24	29
Imports	2016_30	7/31/2016	3,004,922	2.05	n/a	2016	7	31	30
Imports	2016_31	8/7/2016	4,755,308	2.28	n/a	2016	8	7	31
Imports	2016_32	8/14/2016	3,411,357	2.66	n/a	2016	8	14	32
Imports	2016_33	8/21/2016	2,174,395	3.00	n/a	2016	8	21	33
Imports	2016_34	8/28/2016	1,739,123	3.00	n/a	2016	8	28	34
Imports	2016_35	9/4/2016	1,618,473	3.43	n/a	2016	9	4	35
Imports	2016_36	9/11/2016	1,372,446		n/a	2016	9	11	36
Imports	2016_37	9/18/2016	1,991,626		n/a	2016	9	18	37
Imports	2016_38	9/25/2016	2,072,918		n/a	2016	9	25	38
Imports	2016_39	10/2/2016	2,936,079	8.36	n/a	2016	10	2	39
Imports	2016_40	10/9/2016	2,811,005	8.16	n/a	2016	10	9	40
Imports	2016_41	10/16/2016	4,424,895	6.48	n/a	2016	10	16	41
Imports	2016_42	10/23/2016	5,542,441	5.29	n/a	2016	10	23	42
Imports	2016_43	10/30/2016	5,258,054	4.29	n/a	2016	10	30	43
Imports	2016_44	11/6/2016	5,483,341	3.90	n/a	2016	11	6	44
Imports	2016_45	11/13/2016	6,493,060	3.84	n/a	2016	11	13	45
Imports	2016_46	11/20/2016	6,656,040	4.05	n/a	2016	11	20	46
Imports	2016_47	11/27/2016	4,768,910	3.92	n/a	2016	11	27	47
Imports	2016_48	12/4/2016	7,865,231	3.98	n/a	2016	12	4	48
Imports	2016_49	12/11/2016	10,527,504	3.74	n/a	2016	12	11	49
Imports	2016_50	12/18/2016	14,668,254	3.02	n/a	2016	12	18	50

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
Imports	2016_51	12/25/2016	15,037,973	2.28	n/a	2016	12	25	51
Imports	2016_52	1/1/2017	11,932,980	1.82	n/a	2016	1	1	52
Imports	2017_01	1/8/2017	12,060,370	1.76	n/a	2017	1	8	1
Imports	2017_02	1/15/2017	8,021,714	1.86	n/a	2017	1	15	2
Imports	2017_03	1/22/2017	12,025,414	1.89	n/a	2017	1	22	3
Imports	2017_04	1/29/2017	13,177,620	2.25	n/a	2017	1	29	4
Imports	2017_05	2/5/2017	11,729,422	2.73	n/a	2017	2	5	5
Imports	2017_06	2/12/2017	11,119,225	2.81	n/a	2017	2	12	6
Imports	2017_07	2/19/2017	13,370,154	2.82	n/a	2017	2	19	7
Imports	2017_08	2/26/2017	7,204,592	2.97	n/a	2017	2	26	8
Imports	2017_09	3/5/2017	7,070,122	3.14	n/a	2017	3	5	9
Imports	2017_10	3/12/2017	5,220,946	3.65	n/a	2017	3	12	10
Imports	2017_11	3/19/2017	5,058,555	4.36	n/a	2017	3	19	11
Imports	2017_12	3/26/2017	4,128,232	5.09	n/a	2017	3	26	12
Imports	2017_13	4/2/2017	2,033,976	5.56	n/a	2017	4	2	13
Imports	2017_14	4/9/2017	2,686,018	5.56	n/a	2017	4	9	14
Imports	2017_15	4/16/2017	2,794,652	5.33	n/a	2017	4	16	15
Imports	2017_16	4/23/2017	2,938,258	4.13	n/a	2017	4	23	16
Imports	2017_17	4/30/2017	1,845,156	3.78	n/a	2017	4	30	17
Imports	2017_18	5/7/2017	2,414,467	2.98	n/a	2017	5	7	18
Imports	2017_19	5/14/2017	1,742,712	3.60	n/a	2017	5	14	19
Imports	2017_20	5/21/2017	1,481,305	4.22	n/a	2017	5	21	20
Imports	2017_21	5/28/2017	764,237		n/a	2017	5	28	21
Imports	2017_22	6/4/2017	465,954		n/a	2017	6	4	22
Imports	2017_23	6/11/2017	875,137		n/a	2017	6	11	23
Imports	2017_24	6/18/2017	419,358		n/a	2017	6	18	24
Imports	2017_25	6/25/2017	214,339		n/a	2017	6	25	25
Imports	2017_26	7/2/2017	105,732		n/a	2017	7	2	26
Imports	2017_27	7/9/2017	1,102,665		n/a	2017	7	9	27
Imports	2017_28	7/16/2017	6,011,919	2.66	n/a	2017	7	16	28
Imports	2017_29	7/23/2017	7,059,240	1.85	n/a	2017	7	23	29
Imports	2017_30	7/30/2017	8,052,232	1.63	n/a	2017	7	30	30
Imports	2017_31	8/6/2017	5,940,613	1.83	n/a	2017	8	6	31
Imports	2017_32	8/13/2017	6,243,193	2.31	n/a	2017	8	13	32
Imports	2017_33	8/20/2017	4,127,950	2.48	n/a	2017	8	20	33
Imports	2017_34	8/27/2017	4,958,692	2.56	n/a	2017	8	27	34
Imports	2017_35	9/3/2017	2,727,561	2.56	n/a	2017	9	3	35
Imports	2017_36	9/10/2017	2,881,066	3.06	n/a	2017	9	10	36
Imports	2017_37	9/17/2017	2,077,978	3.00	n/a	2017	9	17	37
Imports	2017_38	9/24/2017	2,580,236		n/a	2017	9	24	38
Imports	2017_39	10/1/2017	2,611,045	5.87	n/a	2017	10	1	39
Imports	2017_40	10/8/2017	4,189,435	6.00	n/a	2017	10	8	40
Imports	2017_41	10/15/2017	5,458,338	5.09	n/a	2017	10	15	41
Imports	2017_42	10/22/2017	5,374,550	4.51	n/a	2017	10	22	42
Imports	2017_43	10/29/2017	6,334,182	4.25	n/a	2017	10	29	43
Imports	2017_44	11/5/2017	7,486,465	4.41	n/a	2017	11	5	44
Imports	2017_45	11/12/2017	8,146,821	4.36	n/a	2017	11	12	45
Imports	2017_46	11/19/2017	7,892,745	4.48	n/a	2017	11	19	46
Imports	2017_47	11/26/2017	5,399,792	5.48	n/a	2017	11	26	47
Imports	2017_48	12/3/2017	5,175,284	5.21	n/a	2017	12	3	48
Imports	2017_49	12/10/2017	6,164,010	5.14	n/a	2017	12	10	49
Imports	2017_50	12/17/2017	6,350,133	5.43	n/a	2017	12	17	50

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
Imports	2017_51	12/24/2017	6,841,294	4.69	n/a	2017	12	24	51
Imports	2017_52	12/31/2017	7,770,283	4.89	n/a	2017	12	31	52
Imports	2018_01	1/7/2018	10,518,304	3.90	n/a	2018	1	7	1
Imports	2018_02	1/14/2018	19,062,771	3.30	n/a	2018	1	14	2
Imports	2018_03	1/21/2018	15,514,396	2.90	n/a	2018	1	21	3
Imports	2018_04	1/28/2018	12,920,093	2.66	n/a	2018	1	28	4
Imports	2018_05	2/4/2018	15,155,809	2.62	n/a	2018	2	4	5
Imports	2018_06	2/11/2018	13,020,535	2.54	n/a	2018	2	11	6
Imports	2018_07	2/18/2018	17,941,951	2.51	n/a	2018	2	18	7
Imports	2018_08	2/25/2018	10,576,649	2.41	n/a	2018	2	25	8
Imports	2018_09	3/4/2018	7,936,894	2.33	n/a	2018	3	4	9
Imports	2018_10	3/11/2018	8,339,681	2.22	n/a	2018	3	11	10
Imports	2018_11	3/18/2018	7,473,343	2.31	n/a	2018	3	18	11
Imports	2018_12	3/25/2018	11,432,112	2.67	n/a	2018	3	25	12
Imports	2018_13	4/1/2018	3,405,071	4.58	n/a	2018	4	1	13
Imports	2018_14	4/8/2018	3,954,807	4.76	n/a	2018	4	8	14
Imports	2018_15	4/15/2018	3,085,737	4.05	n/a	2018	4	15	15
Imports	2018_16	4/22/2018	2,738,062	3.78	n/a	2018	4	22	16
Imports	2018_17	4/29/2018	2,656,489	3.38	n/a	2018	4	29	17
Imports	2018_18	5/6/2018	2,558,335	3.33	n/a	2018	5	6	18
Imports	2018_19	5/13/2018	2,129,906	3.73	n/a	2018	5	13	19
Imports	2018_20	5/20/2018	1,921,812	4.22	n/a	2018	5	20	20
Imports	2018_21	5/27/2018	1,530,105	4.00	n/a	2018	5	27	21
Imports	2018_22	6/3/2018	779,618	3.28	n/a	2018	6	3	22
Imports	2018_23	6/10/2018	654,880	3.11	n/a	2018	6	10	23
Imports	2018_24	6/17/2018	519,746		n/a	2018	6	17	24
Imports	2018_25	6/24/2018	280,663		n/a	2018	6	24	25
Imports	2018_26	7/1/2018	173,901		n/a	2018	7	1	26
Imports	2018_27	7/8/2018	2,795,819		n/a	2018	7	8	27
Imports	2018_28	7/15/2018	6,065,653	1.66	n/a	2018	7	15	28
Imports	2018_29	7/22/2018	6,832,206	1.47	n/a	2018	7	22	29
Imports	2018_30	7/29/2018	5,322,096	1.17	n/a	2018	7	29	30
Imports	2018_31	8/5/2018	6,424,682	1.34	n/a	2018	8	5	31
Imports	2018_32	8/12/2018	7,195,177	1.76	n/a	2018	8	12	32
Imports	2018_33	8/19/2018	4,862,357	2.03	n/a	2018	8	19	33
Imports	2018_34	8/26/2018	6,175,881	2.34	n/a	2018	8	26	34
Imports	2018_35	9/2/2018	4,175,759	2.69	n/a	2018	9	2	35
Imports	2018_36	9/9/2018	3,730,966	2.94	n/a	2018	9	9	36
Imports	2018_37	9/16/2018	2,263,989	3.89	n/a	2018	9	16	37
Imports	2018_38	9/23/2018	1,531,958	4.69	n/a	2018	9	23	38
Imports	2018_39	9/30/2018	4,275,869	5.17	n/a	2018	9	30	39
Imports	2018_40	10/7/2018	7,345,079	5.96	n/a	2018	10	7	40
Imports	2018_41	10/14/2018	5,319,374	6.60	n/a	2018	10	14	41
Imports	2018_42	10/21/2018	8,561,702	5.82	n/a	2018	10	21	42
Imports	2018_43	10/28/2018	11,278,832	5.36	n/a	2018	10	28	43
Imports	2018_44	11/4/2018	11,093,062	4.14	n/a	2018	11	4	44
Imports	2018_45	11/11/2018	9,183,941	3.05	n/a	2018	11	11	45
Imports	2018_46	11/18/2018	9,221,332	2.86	n/a	2018	11	18	46
Imports	2018_47	11/25/2018	5,354,991	2.53	n/a	2018	11	25	47
Imports	2018_48	12/2/2018	8,077,070	3.00	n/a	2018	12	2	48
Imports	2018_49	12/9/2018	8,594,281	3.47	n/a	2018	12	9	49
Imports	2018_50	12/16/2018	10,060,258	3.61	n/a	2018	12	16	50

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
Imports	2018_51	12/23/2018	11,563,849	3.39	n/a	2018	12	23	51
Imports	2018_52	12/30/2018	10,744,027	2.89	n/a	2018	12	30	52
Imports	2019_01	1/6/2019	15,580,403	2.74	n/a	2019	1	6	1
Imports	2019_02	1/13/2019	19,021,457	2.46	n/a	2019	1	13	2
Imports	2019_03	1/20/2019	15,600,516	2.38	n/a	2019	1	20	3
Imports	2019_04	1/27/2019	14,756,699	2.25	n/a	2019	1	27	4
Imports	2019_05	2/3/2019	15,394,874	2.20	n/a	2019	2	3	5
Imports	2019_06	2/10/2019	15,954,651	2.19	n/a	2019	2	10	6
Imports	2019_07	2/17/2019	15,460,958	2.08	n/a	2019	2	17	7
Imports	2019_08	2/24/2019	12,447,101	2.05	n/a	2019	2	24	8
Imports	2019_09	3/3/2019	7,831,105	2.11	n/a	2019	3	3	9
Imports	2019_10	3/10/2019	5,452,496	2.39	n/a	2019	3	10	10
Imports	2019_11	3/17/2019	8,043,080	2.85	n/a	2019	3	17	11
Imports	2019_12	3/24/2019	5,009,963	3.60	n/a	2019	3	24	12
Imports	2019_13	3/31/2019	5,207,058	4.00	n/a	2019	3	31	13
Imports	2019_14	4/7/2019	5,110,659	5.25	n/a	2019	4	7	14
Imports	2019_15	4/14/2019	5,922,989	4.40	n/a	2019	4	14	15
Imports	2019_16	4/21/2019	4,739,364	3.36	n/a	2019	4	21	16
Imports	2019_17	4/28/2019	4,357,795	2.53	n/a	2019	4	28	17
Imports	2019_18	5/5/2019	3,636,308	2.09	n/a	2019	5	5	18
Imports	2019_19	5/12/2019	2,357,185	2.00	n/a	2019	5	12	19
Imports	2019_20	5/19/2019	1,607,122	2.00	n/a	2019	5	19	20
Imports	2019_21	5/26/2019	817,911	2.00	n/a	2019	5	26	21
Imports	2019_22	6/2/2019	305,545		n/a	2019	6	2	22
Imports	2019_23	6/9/2019	611,090		n/a	2019	6	9	23
Imports	2019_24	6/16/2019	431,965		n/a	2019	6	16	24
Imports	2019_25	6/23/2019	284,304		n/a	2019	6	23	25
Imports	2019_26	6/30/2019	844,130		n/a	2019	6	30	26
Imports	2019_27	7/7/2019	6,885,869	2.03	n/a	2019	7	7	27
Imports	2019_28	7/14/2019	8,731,407	2.03	n/a	2019	7	14	28
Imports	2019_29	7/21/2019	8,909,666	2.00	n/a	2019	7	21	29
Imports	2019_30	7/28/2019	8,840,960	2.00	n/a	2019	7	28	30
Imports	2019_31	8/4/2019	7,537,025	1.88	n/a	2019	8	4	31
Imports	2019_32	8/11/2019	7,847,208	1.97	n/a	2019	8	11	32
Imports	2019_33	8/18/2019	5,545,915	1.61	n/a	2019	8	18	33
Imports	2019_34	8/25/2019	5,809,549	1.71	n/a	2019	8	25	34
Imports	2019_35	9/1/2019	4,510,022	2.43	n/a	2019	9	1	35
Imports	2019_36	9/8/2019	2,303,148	2.44	n/a	2019	9	8	36
Imports	2019_37	9/15/2019	6,298,011	3.70	n/a	2019	9	15	37
Imports	2019_38	9/22/2019	6,409,880	3.93	n/a	2019	9	22	38
Imports	2019_39	9/29/2019	5,514,610	3.93	n/a	2019	9	29	39
Imports	2019_40	10/6/2019	9,562,433	3.98	n/a	2019	10	6	40
Imports	2019_41	10/13/2019	11,203,950	3.88	n/a	2019	10	13	41
Imports	2019_42	10/20/2019	6,993,457	3.77	n/a	2019	10	20	42
Imports	2019_43	10/27/2019	11,320,358	3.83	n/a	2019	10	27	43
Imports	2019_44	11/3/2019	13,451,564	3.44	n/a	2019	11	3	44
Imports	2019_45	11/10/2019	11,419,003	3.35	n/a	2019	11	10	45
Imports	2019_46	11/17/2019	11,823,626	3.23	n/a	2019	11	17	46
Imports	2019_47	11/24/2019	11,897,895	3.16	n/a	2019	11	24	47
Imports	2019_48	12/1/2019	14,129,765	3.15	n/a	2019	12	1	48
Imports	2019_49	12/8/2019	11,225,619	2.83	n/a	2019	12	8	49
Imports	2019_50	12/15/2019	15,543,056	2.35	n/a	2019	12	15	50

status	Year/Week	Date	Quantity	Price	Revenue	Year	Month	Day	Week
Imports	2019_51	12/22/2019	8,740,673	2.09	n/a	2019	12	22	51
Imports	2019_52	12/29/2019	13,381,864	1.76	n/a	2019	12	29	52
Imports	2020_01	1/5/2020	12,237,628	1.63	n/a	2020	1	5	1
Imports	2020_02	1/12/2020	15,332,393	1.69	n/a	2020	1	12	2
Imports	2020_03	1/19/2020	22,546,598	1.64	n/a	2020	1	19	3
Imports	2020_04	1/26/2020	11,648,608	2.01	n/a	2020	1	26	4
Imports	2020_05	2/2/2020	14,707,400	2.19	n/a	2020	2	2	5
Imports	2020_06	2/9/2020	12,182,842	2.55	n/a	2020	2	9	6
Imports	2020_07	2/16/2020	11,332,640	2.82	n/a	2020	2	16	7
Imports	2020_08	2/23/2020	9,497,146	3.25	n/a	2020	2	23	8
Imports	2020_09	3/1/2020	8,576,175	3.91	n/a	2020	3	1	9
Imports	2020_10	3/8/2020	8,355,915	4.19	n/a	2020	3	8	10
Imports	2020_11	3/15/2020	6,752,601	4.37	n/a	2020	3	15	11
Imports	2020_12	3/22/2020	6,279,565	4.46	n/a	2020	3	22	12
Imports	2020_13	3/29/2020	6,216,837	4.39	n/a	2020	3	29	13
Imports	2020_14	4/5/2020	5,462,459	2.93	n/a	2020	4	5	14
Imports	2020_15	4/12/2020	6,093,065	2.44	n/a	2020	4	12	15
Imports	2020_16	4/19/2020	6,665,806	2.44	n/a	2020	4	19	16
Imports	2020_17	4/26/2020	6,104,301	2.36	n/a	2020	4	26	17
Imports	2020_18	5/3/2020	4,033,470	2.22	n/a	2020	5	3	18
Imports	2020_19	5/10/2020	2,168,092	2.22	n/a	2020	5	10	19
Imports	2020_20	5/17/2020	2,102,640	2.22	n/a	2020	5	17	20
Imports	2020_21	5/24/2020	1,636,296	2.22	n/a	2020	5	24	21
Imports	2020_22	5/31/2020	1,390,852	2.00	n/a	2020	5	31	22
Imports	2020_23	6/7/2020	1,397,660	1.94	n/a	2020	6	7	23
Imports	2020_24	6/14/2020	1,021,738	1.89	n/a	2020	6	14	24
Imports	2020_25	6/21/2020	694,011		n/a	2020	6	21	25
Imports	2020_26	6/28/2020	420,393		n/a	2020	6	28	26
Imports	2020_27	7/5/2020	1,612,361		n/a	2020	7	5	27
Imports	2020_28	7/12/2020	1,676,393		n/a	2020	7	12	28
Imports	2020_29	7/19/2020	6,585,347	1.89	n/a	2020	7	19	29
Imports	2020_30	7/26/2020	9,872,918	1.95	n/a	2020	7	26	30
Imports	2020_31	8/2/2020	4,791,682	2.00	n/a	2020	8	2	31
Imports	2020_32	8/9/2020	4,357,813	1.83	n/a	2020	8	9	32
Imports	2020_33	8/16/2020	3,922,949	1.79	n/a	2020	8	16	33
Imports	2020_34	8/23/2020	4,063,724	1.73	n/a	2020	8	23	34
Imports	2020_35	8/30/2020	10,589,920	2.10	n/a	2020	8	30	35
Imports	2020_36	9/6/2020	11,268,423	2.52	n/a	2020	9	6	36
Imports	2020_37	9/13/2020	7,052,196	2.77	n/a	2020	9	13	37
Imports	2020_38	9/20/2020	9,411,521	3.22	n/a	2020	9	20	38
Imports	2020_39	9/27/2020	7,637,575	3.56	n/a	2020	9	27	39
Imports	2020_40	10/4/2020	17,798,611	3.92	n/a	2020	10	4	40
Imports	2020_41	10/11/2020	3,626,150	4.40	n/a	2020	10	11	41
Imports	2020_42	10/18/2020	12,409,031	4.11	n/a	2020	10	18	42
Imports	2020_43	10/25/2020	20,765,600	3.96	n/a	2020	10	25	43

USDA Report Dates by Week and Year

Year refers to the data year and not necessarily the year of the report. For example 2016 Week 52 was reported 1/1/2017.

Week	2015	2016	2017	2018	2019	2020	Earliest Report	Latest Report
1	1/4/15	1/10/16	1/8/17	1/7/18	1/6/19	1/5/20	1/4	1/10
2	1/11/15	1/17/16	1/15/17	1/14/18	1/13/19	1/12/20	1/11	1/17
3	1/18/15	1/24/16	1/22/17	1/21/18	1/20/19	1/19/20	1/18	1/24
4	1/25/15	1/31/16	1/29/17	1/28/18	1/27/19	1/26/20	1/25	1/31
5	2/1/15	2/7/16	2/5/17	2/4/18	2/3/19	2/2/20	2/1	2/7
6	2/8/15	2/14/16	2/12/17	2/11/18	2/10/19	2/9/20	2/8	2/14
7	2/15/15	2/21/16	2/19/17	2/18/18	2/17/19	2/16/20	2/15	2/21
8	2/22/15	2/28/16	2/26/17	2/25/18	2/24/19	2/23/20	2/22	2/28
9	3/1/15	3/6/16	3/5/17	3/4/18	3/3/19	3/1/20	3/1	3/6
10	3/8/15	3/13/16	3/12/17	3/11/18	3/10/19	3/8/20	3/8	3/13
11	3/15/15	3/20/16	3/19/17	3/18/18	3/17/19	3/15/20	3/15	3/20
12	3/22/15	3/27/16	3/26/17	3/25/18	3/24/19	3/22/20	3/22	3/27
13	3/29/15	4/3/16	4/2/17	4/1/18	3/31/19	3/29/20	3/29	4/3
14	4/5/15	4/10/16	4/9/17	4/8/18	4/7/19	4/5/20	4/5	4/10
15	4/12/15	4/17/16	4/16/17	4/15/18	4/14/19	4/12/20	4/12	4/17
16	4/19/15	4/24/16	4/23/17	4/22/18	4/21/19	4/19/20	4/19	4/24
17	4/26/15	5/1/16	4/30/17	4/29/18	4/28/19	4/26/20	4/26	5/1
18	5/3/15	5/8/16	5/7/17	5/6/18	5/5/19	5/3/20	5/3	5/8
19	5/10/15	5/15/16	5/14/17	5/13/18	5/12/19	5/10/20	5/10	5/15
20	5/17/15	5/22/16	5/21/17	5/20/18	5/19/19	5/17/20	5/17	5/22
21	5/24/15	5/29/16	5/28/17	5/27/18	5/26/19	5/24/20	5/24	5/29
22	5/31/15	6/5/16	6/4/17	6/3/18	6/2/19	5/31/20	5/31	6/5
23	6/7/15	6/12/16	6/11/17	6/10/18	6/9/19	6/7/20	6/7	6/12
24	6/14/15	6/19/16	6/18/17	6/17/18	6/16/19	6/14/20	6/14	6/19
25	6/21/15	6/26/16	6/25/17	6/24/18	6/23/19	6/21/20	6/21	6/26
26	6/28/15	7/3/16	7/2/17	7/1/18	6/30/19	6/28/20	6/28	7/3
27	7/5/15	7/10/16	7/9/17	7/8/18	7/7/19	7/5/20	7/5	7/10
28	7/12/15	7/17/16	7/16/17	7/15/18	7/14/19	7/12/20	7/12	7/17
29	7/19/15	7/24/16	7/23/17	7/22/18	7/21/19	7/19/20	7/19	7/24
30	7/26/15	7/31/16	7/30/17	7/29/18	7/28/19	7/26/20	7/26	7/31
31	8/2/15	8/7/16	8/6/17	8/5/18	8/4/19	8/2/20	8/2	8/7
32	8/9/15	8/14/16	8/13/17	8/12/18	8/11/19	8/9/20	8/9	8/14
33	8/16/15	8/21/16	8/20/17	8/19/18	8/18/19	8/16/20	8/16	8/21
34	8/23/15	8/28/16	8/27/17	8/26/18	8/25/19	8/23/20	8/23	8/28
35	8/30/15	9/4/16	9/3/17	9/2/18	9/1/19	8/30/20	8/30	9/4
36	9/6/15	9/11/16	9/10/17	9/9/18	9/8/19	9/6/20	9/6	9/11
37	9/13/15	9/18/16	9/17/17	9/16/18	9/15/19	9/13/20	9/13	9/18
38	9/20/15	9/25/16	9/24/17	9/23/18	9/22/19	9/20/20	9/20	9/25
39	9/27/15	10/2/16	10/1/17	9/30/18	9/29/19	9/27/20	9/27	10/2
40	10/4/15	10/9/16	10/8/17	10/7/18	10/6/19	10/4/20	10/4	10/9
41	10/11/15	10/16/16	10/15/17	10/14/18	10/13/19	10/11/20	10/11	10/16
42	10/18/15	10/23/16	10/22/17	10/21/18	10/20/19	10/18/20	10/18	10/23
43	10/25/15	10/30/16	10/29/17	10/28/18	10/27/19	10/25/20	10/25	10/30
44	11/1/15	11/6/16	11/5/17	11/4/18	11/3/19		11/1	11/6
45	11/8/15	11/13/16	11/12/17	11/11/18	11/10/19		11/8	11/13
46	11/15/15	11/20/16	11/19/17	11/18/18	11/17/19		11/15	11/20
47	11/22/15	11/27/16	11/26/17	11/25/18	11/24/19		11/22	11/27
48	11/29/15	12/4/16	12/3/17	12/2/18	12/1/19		11/29	12/4
49	12/6/15	12/11/16	12/10/17	12/9/18	12/8/19		12/6	12/11
50	12/13/15	12/18/16	12/17/17	12/16/18	12/15/19		12/13	12/18
51	12/20/15	12/25/16	12/24/17	12/23/18	12/22/19		12/20	12/25
52	12/27/15	1/1/17	12/31/17	12/30/18	12/29/19		1/1	12/31
53	1/3/16						1/3	1/3

Attachment D

Explanation of Data Sources and Compilation in the Monthly and Weekly Dataset

This exhibit provides data and analysis of domestic and import volume and price of fresh cultivated blueberries on a weekly, monthly, and seasonal basis.

Data Sources and Compilation

- US and Import Volume
    - Agronometrics[1] based on weekly Movement reports from the USDA Agricultural Marketing Service (AMS). Data are reported by week, origin (U.S. geographies or foreign countries), and nature (conventional or organic). All volumes are in pounds.
    - Import volumes are scaled to match country/monthly imports in the official statistics of fresh cultivated blueberries net of re-exports.[2]
    - U.S. volumes are scaled to match the aggregate quantity of U.S. producers' U.S. shipments of Fresh Cultivated blueberries in Staff Report Table IV-3.[3]
- US and Import Prices
    - Agronometrics dataset based on weekly Shipping Point reports from AMS, weighted by Movement volume. All prices in dollars per pound.[4]
    - The weighting is done at the most granular geographic level possible and accounts for relative organic/conventional volumes.[5]
        - At each point of aggregation (e.g., from the origin-specific data to the aggregate domestic and import data, or from weekly data to monthly data), prices are weighted based on the volume for which there is an observed price.[6]
    - Note that prices are not comprehensive of all U.S. shipments as they are based on surveys conducted by the USDA. While these data are representative of U.S. market prices, the absence of a weekly price observation does not indicate the absence of domestic volumes in that week, as demonstrated by the Movement data.
        - Three weekly price observations were estimated based on prices in adjacent weeks, as explained below.

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[1] The source Agronometrics datasets are included with this exhibit.

[2] HTS commodities 0810.40.0026 and 0810.40.0029.

[3] Staff Report Table IV-3 reflects some small volumes of wild fresh blueberries. According to the production figures in Staff Report Table III-3, these volumes are immaterial to the analysis.

[4] The raw AMS Shipping Point data, such as is compiled in the Commission's pricing data, are reported in dollars per unit. Agronometrics converts all products to dollars per pound in order to report an aggregate price across product types.

[5] The granular source datasets are not always reported on the same geographic basis. For example, Oregon and Washington are reported separately in the Movement data but on a combined basis in the Shipping Point data. The harmonization of geographies requires a simple average of prices across conventional/organic status prior to merging with the Movement dataset. However, once volumes and prices are merged for all geographic entities, further aggregation is done using volume-weighted averages.

[6] For the weighted price, the numerator is the sum product of all prices and quantities for which there is an observed price and the denominator is the sum of quantities for which there is an observed price. The aggregated volume reflects all volumes – not just those with prices.

The result is a dataset of weekly volumes and prices of domestic and import shipments of fresh cultivated blueberries from January 2015 through October 2020. The compiled datasets for analysis are provided within this exhibit. The monthly dataset, also provided within this exhibit, reflects the monthly aggregation of the weekly data. The seasonal analysis, based directly on the monthly data, classifies months into the Spring Shoulder (March-April), Peak Season (May-July), the Fall Shoulder (August-October), and Other Months.

Week Numbering

The USDA/Agronometrics data are reported in weeks based on the date of the report, which is issued at the end of the week. Weeks do not reflect identical dates in each year. For example, Week 10 begins as early as March 8 and as late as March 13. The weekly analysis retains the USDA/ Agronometrics week number for consistency and in order to compare with Dr. Prusa's analysis. The monthly dataset is aggregated based on the USDA's report date.

Estimation of Three Missing Price Observations

There are three weekly U.S. price observations missing in the Shipping Point data with significant domestic quantities (greater than one million pounds) in the corresponding Movement data: Week 11 2017, Week 39 2018, and Week 40 2019. These prices were estimated by applying the nearest U.S. price. In the case of the two fall observations, the price from the prior week was applied. For the spring price, the price from two weeks later was applied as there is no observation in the week immediately before or after.

Calculation of Derivative Measures

- Domestic and import market shares are calculated directly from volumes.
- Domestic Implied Revenue is the U.S. price multiplied by U.S. volume in a given period.
    - Note that this is intended to be a proxy for actual revenue earned by growers but overstates the level of revenues. The Shipping Point data, as its name suggests, does not reflect the same level of trade as farmers' financial operations. However, the trend in this revenue measure is representative of the trend in growers' actual revenues.
- The calculation of monthly profits relies on monthly volume and implied revenue from this analysis, where costs are based on annual unit costs in Staff Report Table III-20, reflecting operations of all blueberry growers. Costs were applied uniformly to all months of a year.

Attachment E

Agronometrics Shipping Point Price: Conventional

date	Week	Washington And Oregon	Uruguay	Peru	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	Canada	California	Average	Argentina And Uruguay	Argentina
2015-01-04	1							4.000752			3.214134			3.326508		
2015-01-11	2							3.689582			2.926476			3.035491		
2015-01-18	3							3.422866			2.949534			3.021251		
2015-01-25	4							3.778488			3.048872			3.170475		
2015-02-01	5							4.223016			3.124397			3.3075		
2015-02-08	6							4.223016			3.132207			3.326994		
2015-02-15	7							4.13411			3.540042			3.610764		
2015-02-22	8							4.223016			3.33396			3.432744		
2015-03-01	9							4.223016			3.229765			3.357105		
2015-03-08	10							3.867394			2.930437			3.086597		
2015-03-15	11							3.778488			2.622715			2.815344		
2015-03-22	12							3.778488			2.489357			2.919067		
2015-03-29	13							4.889808		6.89472	2.667168			4.901767		
2015-04-05	14							5.334336		6.770434				6.411409		
2015-04-12	15							5.380603		5.146376				5.202144		
2015-04-19	16							3.956299		4.032958				4.017626		
2015-04-26	17							3.378413		3.370928			4.7863872	3.776414		
2015-05-03	18							2.978338	2.894317	3.106706			3.5238672	3.160565		
2015-05-10	19							2.667168	2.626911	2.917026			2.725632	2.764211		
2015-05-17	20							2.667168	2.606184	2.444904			2.612736	2.57744		
2015-05-24	21				2.444904				2.64222				2.746548	2.671704		
2015-05-31	22				2.168208				2.50128				2.612736	2.478088		
2015-06-07	23				1.757246				1.567642				2.3569056	2.009675		
2015-06-14	24				1.468757				1.183896				1.8570384	1.591682		
2015-06-21	25	2.043468			1.468757	1.653372			1.11132				1.778112	1.586466		
2015-06-28	26	1.931202			1.388016	1.498014			1.165752			1.369872		1.581552		
2015-07-05	27	1.855224			1.374408	1.4175						1.250802		1.550632		
2015-07-12	28	1.8125856			1.388016	1.37713	1.70735					1.11132		1.534831		
2015-07-19	29	1.762236			1.365336	1.394366	1.669248					1.211112		1.540316		
2015-07-26	30	1.8520488			1.388016	1.501416	1.780554					1.49053		1.677462		
2015-08-02	31	2.2643712			1.388016		1.903003					1.789906		1.966073		
2015-08-09	32	2.723868					2.298996					2.223547		2.416313		
2015-08-16	33	2.9016792					3.056886					2.62116		2.898191		
2015-08-23	34	2.9239056					3.39066					2.923906		3.07949		
2015-08-30	35	3.0681504					3.39066					3.001471		3.153427		
2015-09-06	36	3.43602					3.778942					3.557736		3.600992		
2015-09-13	37	5.112072					4.461156							4.678128		
2015-09-20	38	5.7362256					5.805173							5.770699		
2015-09-27	39	6.408234	7.449019				6.349493							7.000749		7.339248
2015-10-04	40		7.339248				6.672456							7.070112		7.258896
2015-10-11	41							7.561512						7.560907		7.5606048
2015-10-18	42							7.672644						8.13456		8.365518
2015-10-25	43							7.783776						8.226792		8.4483
2015-11-01	44							7.605965						7.697592		7.754859
2015-11-08	45							6.805814						7.134081		7.339248
2015-11-15	46							6.450192						6.677559		6.753348
2015-11-22	47							5.7834						6.02701		6.128514
2015-11-29	48							5.6133						5.845203		5.922504
2015-12-06	49							5.112072						5.372438		5.4592272
2015-12-13	50							5.023166			5.112072			4.783508		4.223016
2015-12-20	51							4.578638			4.027968			4.165636		
2015-12-27	52							4.000752			3.389526			3.511771		
2016-01-03	53							3.778488			3.361743			3.445092		
2016-01-10	1							3.778488			3.209674			3.323436		
2016-01-17	2							4.089658			3.304022			3.461149		
2016-01-24	3							4.16745			3.293136			3.467999		
2016-01-31	4							4.223016			3.293136			3.514536		
2016-02-07	5							4.000752			3.174633			3.371328		
2016-02-14	6							3.511771			3.06815			3.156875		
2016-02-21	7							2.889432			2.848041			2.856319		
2016-02-28	8							2.667168			2.487089			2.523105		
2016-03-06	9							2.800526			2.534364			2.592225		
2016-03-13	10							3.111696			2.395462			2.6001		
2016-03-20	11							4.13411			3.14874			3.596636		
2016-03-27	12							5.871398						5.871398		
2016-04-03	13							6.716909						6.716909		
2016-04-10	14							7.116984		8.31721				7.717097		
2016-04-17	15							8.228304		8.229816				8.229129		
2016-04-24	16							6.805814		7.312486			7.0280784	7.114716		
2016-05-01	17							5.157432	4.641462	5.643609			6.0029424	5.345285		
2016-05-08	18							3.689582	3.198334	3.720427			4.0452048	3.613248		
2016-05-15	19							2.711621	2.479378	2.684405			3.2450544	2.71404		
2016-05-22	20				1.862028				2.13192	2.312453			2.482704	2.261793		
2016-05-29	21				1.778112				1.696464				2.1459816	1.941635		
2016-06-05	22				1.806462				1.891512				1.945944	1.897466		
2016-06-12	23				1.778112				1.945944				2.27934	2.123453		
2016-06-19	24				1.633867	1.945944			1.555848				2.27934	1.93752		
2016-06-26	25	2.252124			1.46785	1.72368			1.378037			1.778112	2.027592	1.759619		
2016-07-03	26	2.1849912			1.366243	1.627517			1.333584			2.001737		1.84354		
2016-07-10	27	2.043468			1.333584	1.528632	1.778112					1.834812		1.770984		
2016-07-17	28	1.862028			1.333584	1.356264	1.540426					1.72368		1.666907		

date	Week	Washington And Oregon	Uruguay	Peru	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	Canada	California	Average	Argentina And Uruguay	Argentina
2016-07-24	29	1.9736136				1.487808	1.512302					1.862482		1.778717		
2016-07-31	30	2.1564144				1.79172	1.936872					2.051179		2.039016		
2016-08-07	31	2.3850288					2.05753					2.278886		2.277072		
2016-08-14	32	2.8245672					2.424946					2.656735		2.67751		
2016-08-21	33	3.0794904					2.891246					3.000564		3.010271		
2016-08-28	34	3.2123952					3.44736					3.000564		3.220106		
2016-09-04	35	3.5072352					3.566657					3.429864		3.509184		
2016-09-11	36	3.703644					4.26006							3.942108		
2016-09-18	37	4.796496					6.316834							5.42997		
2016-09-25	38						6.227928							6.227928		
2016-10-02	39			8.495021										8.25053	8.00604	
2016-10-09	40			8.539474										8.272757	8.00604	
2016-10-16	41			6.52428				6.505758						6.494645	6.450192	
2016-10-23	42			5.425963				5.7834						5.455901	5.1583392	
2016-10-30	43			4.334602				5.603774						4.661194	4.0452048	
2016-11-06	44			4.024339				4.089658						3.979282	3.823848	
2016-11-13	45			3.891888				3.778488						3.835188	3.835188	
2016-11-20	46			4.135018				3.778488						3.993797	4.0678848	
2016-11-27	47			4.114152				3.778488						3.890376	3.778488	
2016-12-04	48			3.983364				3.778488			4.15044			3.961289	3.44736	
2016-12-11	49			3.746282				3.778488			3.726233			3.737777		
2016-12-18	50			3.212395				3.156149			2.977128			3.049301		
2016-12-25	51			2.390018				2.667168			2.249554			2.32717		
2017-01-01	52			2.057076				2.22264			1.760724			1.877904		
2017-01-08	1			1.945944				2.389338			1.686636			1.822338		
2017-01-15	2			2.212207				2.444904			1.730333			1.916813		
2017-01-22	3			2.501604				2.444904			1.80684			2.032128		
2017-01-29	4			2.501604				2.711621			2.209334			2.293009		
2017-02-05	5							3.33396			2.677752			2.771496		
2017-02-12	6							3.778488			2.700432			2.85444		
2017-02-19	7							3.778488			2.720088			2.871288		
2017-02-26	8							4.056318			2.741445			2.929284		
2017-03-05	9							4.534186			2.797956			3.045989		
2017-03-12	10							4.623091			2.919218			3.162629		
2017-03-19	11							5.112072			3.153972			3.480322		
2017-03-26	12							5.5566			3.871098			4.366834		
2017-04-02	13							5.5566		6.749568				6.290734		
2017-04-09	14							5.5566		5.83375			6.227928	5.863007		
2017-04-16	15							5.334336	4.963896	4.893437			6.89472	5.433536		
2017-04-23	16							4.13411	3.815532	3.681871			6.450192	4.332054		
2017-04-30	17							3.778488	2.745187	2.845886			5.0231664	3.330634		
2017-05-07	18							2.978338	3.035038	3.012811			3.8673936	3.156905		
2017-05-14	19							3.600677	3.53808	3.558038			3.778488	3.595234		
2017-05-21	20				3.445848			4.223016	3.896424	3.796632			4.223016	3.92419		
2017-05-28	21				2.821392				3.446604				4.000752	3.464597		
2017-06-04	22				2.389338				2.391606				2.835	2.612736		
2017-06-11	23				2.146435				2.113776				2.835	2.482553		
2017-06-18	24				2.157322	2.360534			2.113776				2.889432	2.552256		
2017-06-25	25				2.306556	2.458512							2.889432	2.590358		
2017-07-02	26				2.264598	2.458512								2.372328		
2017-07-09	27	3.111696			2.33604	2.458512	2.383668							2.572479		
2017-07-16	28	2.6794152			2.33604	2.320618	2.280096					2.657642		2.556896		
2017-07-23	29	2.1505176				1.654733	1.756339					1.851142		1.902398		
2017-07-30	30	2.023056					1.622074					1.634321		1.787365		
2017-08-06	31	2.1346416					1.766318					1.833905		1.940682		
2017-08-13	32	2.478924					2.119219					2.311999		2.340213		
2017-08-20	33	2.6789616					2.44296					2.47847		2.54352		
2017-08-27	34	2.835					2.465316					2.556036		2.642394		
2017-09-03	35	2.723868					3.086294					2.556036		2.72922		
2017-09-10	36	3.14118					3.373272					3.057264		3.173963		
2017-09-17	37	3.057264					3.452803					3.000564		3.17021		
2017-09-24	38	3.057264					3.819312							3.438288		
2017-10-01	39	4.667544		6.005664			5.112979							5.380603	5.7362256	
2017-10-08	40	5.00094		5.870491			6.005664							5.806534	5.8487184	6.379884
2017-10-15	41			5.279904				5.039496						5.092691	4.945374	
2017-10-22	42			4.645771				4.489733						4.505155	4.3799616	
2017-10-29	43			4.291056				4.223016						4.237475	4.204872	
2017-11-05	44			4.479754				4.223016						4.370663	4.3899408	
2017-11-12	45			4.278582				4.667544						4.410977	4.34889	
2017-11-19	46			4.446187				4.667544						4.511185	4.445928	
2017-11-26	47			5.6133				5.223204						5.362686	5.391036	
2017-12-03	48			4.889808				4.978714			5.61829			5.30591	5.112072	
2017-12-10	49			4.889808				4.845355			5.334336			5.136768	5.00094	
2017-12-17	50			5.5566				4.667544			5.549342			5.374434		
2017-12-24	51			4.569768				4.667544			4.726118			4.680171		
2017-12-31	52							4.44528			4.963896			4.834242		
2018-01-07	1							4.278582			3.830274			3.894318		
2018-01-14	2							3.867394			3.23988			3.337929		
2018-01-21	3							3.33396			2.848986			2.918268		
2018-01-28	4							3.200602			2.563294			2.690755		
2018-02-04	5							3.111696			2.535443			2.631485		
2018-02-11	6							2.933885			2.491171			2.564957		

date	Week	Washington And Oregon	Uruguay	Peru	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	Canada	California	Average	Argentina And Uruguay	Argentina
2018-02-18	7							2.667168			2.491171			2.520504		
2018-02-25	8							2.667168			2.34239			2.39652		
2018-03-04	9							2.622715			2.221128			2.278498		
2018-03-11	10							2.444904			2.084141			2.106689		
2018-03-18	11							2.444904			2.179246			2.217197		
2018-03-25	12							3.156149		6.400296	2.435184			2.84715		
2018-04-01	13							4.578638		5.966654				5.503982		
2018-04-08	14							4.75645		5.242608				5.06898		
2018-04-15	15							4.045205		4.635338				4.438627		
2018-04-22	16							3.778488		3.790735				3.786653		
2018-04-29	17							3.378413	3.367526	3.445546				3.400911		
2018-05-06	18							3.33396		3.546245			4.667544	3.67416		
2018-05-13	19							3.734035		3.667356			4.4897328	4.037796		
2018-05-20	20							4.223016					4.8009024	4.511959		
2018-05-27	21				3.626532			4.000752	3.519936				4.667544	3.982608		
2018-06-03	22				3.335472			3.278394	3.392928				4.16745	3.582742		
2018-06-10	23				2.623622			3.111696	2.29824				3.6895824	2.96946		
2018-06-17	24				2.138724				2.075976				2.584386	2.398497		
2018-06-24	25				2.135549	2.424946							2.122848	2.201548		
2018-07-01	26	2.5850664			1.811678	1.890605								2.218104		
2018-07-08	27	2.202228			1.779246	1.800792	2.138724							2.011968		
2018-07-15	28	1.9010376			1.72368	1.642032	1.751803					1.657908		1.76484		
2018-07-22	29	1.556982				1.433376	1.594858					1.465695		1.512407		
2018-07-29	30	1.2900384				1.681722	1.685578					1.165752		1.44388		
2018-08-05	31	1.333584					1.669248					1.343563		1.448798		
2018-08-12	32	1.8679248					2.090189					1.756339		1.904818		
2018-08-19	33	2.327616					2.444904					2.033035		2.25288		
2018-08-26	34	2.667168					2.669436					2.33604		2.570044		
2018-09-02	35	2.6680752		4.50198								2.379586		3.12336		
2018-09-09	36	2.793042		4.417497								2.600942		3.366144		
2018-09-16	37	3.063312		4.35267								3.075408		3.709503		
2018-09-23	38	4.1576976		4.694062										4.545072		
2018-09-30	39			5.169906										5.169906		
2018-10-07	40			5.892264				6.005664						6.328545	7.116984	6.450192
2018-10-14	41			6.672456				6.005664						6.561324	6.89472	6.672456
2018-10-21	42			5.737133				5.826038						5.804039	5.781888	6.227928
2018-10-28	43			5.289883				5.24543						5.435716	5.6037744	
2018-11-04	44			4.023432				4.311922						4.228686	4.2896952	
2018-11-11	45			2.801434				3.778488						3.254328	3.209787	
2018-11-18	46			2.946132				2.50047						2.8188		
2018-11-25	47			2.946132				2.055942						2.768094		
2018-12-02	48			3.118046				2.355998			3.33396			3.027024		
2018-12-09	49			3.251178				3.156149			3.778488			3.323225		
2018-12-16	50			3.451216				3.556224			3.695139			3.526259		
2018-12-23	51			3.37932				3.467318			3.37297			3.386275		
2018-12-30	52							2.889432						2.889432		
2019-01-06	1			2.558304				2.7783			2.849062			2.797416		
2019-01-13	2			2.497219				2.667168			2.421317			2.468673		
2019-01-20	3			2.587032				2.202682			2.384273			2.426941		
2019-01-27	4			2.422872				2.113776			2.227365			2.281716		
2019-02-03	5			2.349648				2.200867			2.167452			2.236743		
2019-02-10	6			2.232392				2.444904			2.141597			2.202187		
2019-02-17	7			1.98936				2.444904			2.021208			2.057569		
2019-02-24	8			1.72368				2.444904			1.978603			1.97316		
2019-03-03	9			1.611187				2.578262			1.938268			1.93654		
2019-03-10	10							2.711621			2.017794			2.133432		
2019-03-17	11							3.111696			2.642839			2.789357		
2019-03-24	12							3.600677		5.378789				4.489733		
2019-03-31	13							4.000752		5.376861				4.847588		
2019-04-07	14							5.24543		4.890262				5.008651		
2019-04-14	15							4.400827		4.401281				4.40113		
2019-04-21	16							3.35664	3.279528	3.289961				3.299124		
2019-04-28	17							2.53381	2.573726	2.768321				2.643581		
2019-05-05	18							2.089282	2.184538	2.273897				2.20123		
2019-05-12	19							2.000376	1.768133	2.063232			2.667168	2.005093		
2019-05-19	20				2.18862			2.000376	1.755432				2.621052	2.162992		
2019-05-26	21				2.22264			2.000376	2.027592				2.8685664	2.451708		
2019-06-02	22				2.168208				1.986768				2.668302	2.372895		
2019-06-09	23				2.168208				2.172744				2.6789616	2.424719		
2019-06-16	24				2.135549				1.924171				2.7456408	2.38775		
2019-06-23	25				2.091096	2.029406			1.654506				2.8023408	2.301831		
2019-06-30	26	2.5020576			2.113776	1.829822							2.8785456	2.440549		
2019-07-07	27	2.320164			2.074464	1.778112						2.027592		2.114843		
2019-07-14	28	2.113776				1.712794	2.085426					2.027592		2.011012		
2019-07-21	29	2.0938176				1.555848	1.832544					1.996294		1.940939		
2019-07-28	30	1.9405008					1.669248					2.002644		1.911108		
2019-08-04	31	1.9908504					1.669248					1.883801		1.88371		
2019-08-11	32	2.1169512					1.734566					1.97316		1.982958		
2019-08-18	33	1.72368					1.799885					1.612548		1.718795		
2019-08-25	34	1.8107712					1.978603					1.712794		1.834056		
2019-09-01	35	2.050272		3.057831			2.33604					1.978603		2.447271		
2019-09-08	36	2.57256		3.307878			2.33604					2.168208		2.716867		

date	Week	Washington And Oregon	Uruguay	Peru	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	Canada	California	Average	Argentina And Uruguay	Argentina
2019-09-15	37	2.5964064		3.804055			2.33604					2.140992		3.023328		
2019-09-22	38	2.9484		3.934224			2.33604							3.6234		
2019-09-29	39	2.9484		3.964464				3.64513						3.766625	4.223016	
2019-10-06	40			3.993494				3.556224						3.951945	4.223016	
2019-10-13	41			3.852878				3.734035						3.903137	4.223016	
2019-10-20	42			3.668112				3.778488						3.801168	4.223016	
2019-10-27	43			3.786653				3.600677						3.83673	4.223016	
2019-11-03	44			3.307878				3.556224						3.427704	3.778488	
2019-11-10	45			3.232807				3.556224						3.35543	3.6451296	
2019-11-17	46			3.14118				3.556224						3.241146	3.297672	
2019-11-24	47			3.14118				3.245054						3.163795	3.168396	
2019-12-01	48			3.152237				2.889432						3.159959	3.4010928	
2019-12-08	49			2.921184				2.400451						2.845468	3.556224	
2019-12-15	50			2.451481				2.045736			2.306556			2.361535		
2019-12-22	51			2.134415				1.935058			2.085143			2.090875		
2019-12-29	52			1.778112				1.743336			1.760346			1.766352		
2020-01-05	1			1.668114				1.555848			1.639764			1.64304		
2020-01-12	2			1.73434				1.555848			1.71801			1.70725		
2020-01-19	3			1.587096				1.778112			1.646064			1.636279		
2020-01-26	4							1.863162			2.057076			2.018293		
2020-02-02	5							2.068416			2.217499			2.180228		
2020-02-09	6							2.424946			2.59051			2.557397		
2020-02-16	7							3.134376			2.695518			2.78329		
2020-02-23	8							3.556224			3.050744			3.15184		
2020-03-01	9							4.246603			3.651934			3.770868		
2020-03-08	10							4.44528			4.012999			4.099455		
2020-03-15	11							4.44528			4.25749			4.295048		
2020-03-22	12							4.44528		5.548889	4.50198			4.909404		
2020-03-29	13							4.400827		5.136113	4.353804			4.737528		
2020-04-05	14							2.933885		4.029102				3.607865		
2020-04-12	15							2.444904		2.22264				2.34612		
2020-04-19	16							2.444904	2.58552	2.356452				2.44296		
2020-04-26	17							2.355998	2.434471	2.168662				2.312453		
2020-05-03	18							2.22264	2.423585	2.583252			2.723868	2.485415		
2020-05-10	19							2.22264	2.33604	2.33604			2.731968	2.513754		
2020-05-17	20				2.473254			2.22264	2.33604				2.63088	2.487918		
2020-05-24	21				2.500243			2.22264	2.558304				2.63088	2.528971		
2020-05-31	22				2.30769			2.000376	2.057076				2.408994	2.265354		
2020-06-07	23				2.122848			1.935058	1.891512				2.224152	2.103646		
2020-06-14	24				2.278886			1.891512	1.97951				2.5050816	2.305098		
2020-06-21	25				2.287656	2.667168			2.228083				2.66868	2.534717		
2020-06-28	26	2.8132272				2.512944							2.66868	2.666442		
2020-07-05	27	2.696652				2.444904							2.66868	2.623925		
2020-07-12	28	2.6290656				2.390472	2.33604							2.524417		
2020-07-19	29	2.5075008				2.368699	2.189074					1.891512		2.369304		
2020-07-26	30	2.3333184				2.189981	1.891512					1.9467		2.131571		
2020-08-02	31	2.1346416					1.891512					2.001737		2.032854		
2020-08-09	32	2.0108088		1.778112			1.669248					1.84343		1.865106		
2020-08-16	33	1.9999224		1.778112			1.555848					1.788696		1.819562		
2020-08-23	34	1.850688		1.913285			1.805328					1.696464		1.816441		
2020-08-30	35	2.1446208		2.169115			1.963181					1.940501		2.054354		
2020-09-06	36	2.2552992		2.64721			2.31336					2.054808		2.317669		
2020-09-13	37	2.787696		3.002832			2.408616					2.186352		2.6653		
2020-09-20	38	3.252312		3.224189										3.241495		
2020-09-27	39	3.94632		3.558492										3.687768		
2020-10-04	40	4.223016		3.917503				4.000752						3.960306		
2020-10-11	41			3.991226				4.889808						4.170943		
2020-10-18	42			4.099127				4.16745						4.112791		
2020-10-25	43			3.973763				4.223016						3.966967	3.612924	
2020-11-01	44			3.434659				3.467318						3.429864	3.4015464	
2020-11-08	45			2.904854				3.33396						2.971382	2.8898856	
2020-11-15	46			2.686068				3.33396						2.778678	2.639952	
2020-11-22	47			2.445509				2.53381						2.475144	2.490264	
2020-11-29	48			2.512037				2.22264						2.417688	2.520504	
2020-12-06	49			2.465033				2.113776						2.3814		
2020-12-13	50			2.345792				2.045736						2.285781		
2020-12-20	51			2.260784				2.178187			2.027592			2.195683		
2020-12-27	52			2.283876				2.000376			2.027592			2.170152		
2021-01-03	53			2.262614				2.000376			2.111714			2.175231		

Agronometrics Shipping Point Price: Organic

date	Week	Washington And Oregon	Peru	New Jersey	Georgia	Florida	Chile	California	Average	Argentina And Uruguay	Argentina
2015-01-04	1										
2015-01-11	2										
2015-01-18	3										
2015-01-25	4										
2015-02-01	5										
2015-02-08	6										
2015-02-15	7										
2015-02-22	8										
2015-03-01	9										
2015-03-08	10										
2015-03-15	11										
2015-03-22	12										
2015-03-29	13										
2015-04-05	14										
2015-04-12	15					10.8864			10.8864		
2015-04-19	16					9.223956			9.223956		
2015-04-26	17					7.116984		6.33906	6.77124		
2015-05-03	18					6.450192		5.60196	5.844312		
2015-05-10	19							5.112072	5.112072		
2015-05-17	20							5.112072	5.112072		
2015-05-24	21							5.2463376	5.246338		
2015-05-31	22							5.112072	5.112072		
2015-06-07	23							5.0231664	5.023166		
2015-06-14	24							4.667544	4.667544		
2015-06-21	25	3.971268			4.223016			4.667544	4.414032		
2015-06-28	26	3.633984			4.168584				3.794364		
2015-07-05	27	3.024378							3.024378		
2015-07-12	28	3.052728							3.052728		
2015-07-19	29	3.264408							3.264408		
2015-07-26	30	4.0093704							4.00937		
2015-08-02	31	5.2608528							5.260853		
2015-08-09	32	5.8387392							5.838739		
2015-08-16	33	6.105456							6.105456		
2015-08-23	34	7.6694688							7.669469		
2015-08-30	35	8.899065							8.899065		
2015-09-06	36	10.8836784							10.88368		
2015-09-13	37	10.718568							10.71857		
2015-09-20	38	12.097512							12.09751		
2015-09-27	39										
2015-10-04	40										
2015-10-11	41										
2015-10-18	42										
2015-10-25	43										
2015-11-01	44										
2015-11-08	45										
2015-11-15	46										
2015-11-22	47										
2015-11-29	48										
2015-12-06	49										
2015-12-13	50										
2015-12-20	51										
2015-12-27	52						9.339624		9.339624		
2016-01-03	53						8.463042		8.463042		
2016-01-10	1						7.539286		7.539286		
2016-01-17	2						7.783776		7.783776		
2016-01-24	3						7.478163		7.478163		
2016-01-31	4						7.005852		7.005852		

date	Week	Washington And Oregon	Peru	New Jersey	Georgia	Florida	Chile	California	Average	Argentina And Uruguay	Argentina
2016-02-07	5						6.477408		6.477408		
2016-02-14	6						5.916305		5.916305		
2016-02-21	7						4.973157		4.973157		
2016-02-28	8						4.262933		4.262933		
2016-03-06	9						4.082904		4.082904		
2016-03-13	10						5.334336		5.334336		
2016-03-20	11										
2016-03-27	12										
2016-04-03	13										
2016-04-10	14										
2016-04-17	15										
2016-04-24	16										
2016-05-01	17										
2016-05-08	18							6.3612864	6.361286		
2016-05-15	19							6.005664	6.005664		
2016-05-22	20							4.556412	4.556412		
2016-05-29	21							4.223016	4.223016		
2016-06-05	22							4.223016	4.223016		
2016-06-12	23							4.44528	4.44528		
2016-06-19	24							4.44528	4.44528		
2016-06-26	25	2.558304							2.558304		
2016-07-03	26	3.279528							3.279528		
2016-07-10	27	3.279528							3.279528		
2016-07-17	28	3.279528							3.279528		
2016-07-24	29	3.501792							3.501792		
2016-07-31	30	3.612924							3.612924		
2016-08-07	31	3.778488							3.778488		
2016-08-14	32	4.2125832							4.212583		
2016-08-21	33	6.3168336							6.316834		
2016-08-28	34	7.2058896							7.20589		
2016-09-04	35	8.0949456							8.094946		
2016-09-11	36	8.617266							8.617266		
2016-09-18	37										
2016-09-25	38										
2016-10-02	39										
2016-10-09	40										
2016-10-16	41										
2016-10-23	42										
2016-10-30	43										
2016-11-06	44										
2016-11-13	45										
2016-11-20	46										
2016-11-27	47										
2016-12-04	48						6.796629		6.478769	5.207328	
2016-12-11	49						6.376709		6.376709		
2016-12-18	50						6.062818		6.062818		
2016-12-25	51						5.670151		5.670151		
2017-01-01	52						5.255712		5.255712		
2017-01-08	1						4.519368		4.519368		
2017-01-15	2						4.371192		4.371192		
2017-01-22	3						4.371192		4.371192		
2017-01-29	4						4.44528		4.44528		
2017-02-05	5						4.434394		4.434394		
2017-02-12	6						4.094496		4.094496		
2017-02-19	7						4.094496		4.094496		
2017-02-26	8						4.094496		4.094496		
2017-03-05	9						4.527533		4.527533		
2017-03-12	10						5.052802		5.052802		

date	Week	Washington And Oregon	Peru	New Jersey	Georgia	Florida	Chile	California	Average	Argentina And Uruguay	Argentina
2017-03-19	11						4.948776		4.948776		
2017-03-26	12										
2017-04-02	13					8.450568			8.450568		
2017-04-09	14					8.00604		8.228304	8.117172		
2017-04-16	15					8.00604		8.228304	8.117172		
2017-04-23	16				7.857864	7.938		7.783776	7.86019		
2017-04-30	17				7.116984	7.339248		7.339248	7.289856		
2017-05-07	18				6.716002	6.114528		6.5390976	6.542046		
2017-05-14	19				6.058584	6.114528		6.450192	6.251845		
2017-05-21	20				5.289883	5.112072		5.112072	5.180461		
2017-05-28	21				4.889808			5.112072	5.048568		
2017-06-04	22							4.889808	4.889808		
2017-06-11	23							4.889808	4.889808		
2017-06-18	24							4.667544	4.667544		
2017-06-25	25										
2017-07-02	26										
2017-07-09	27	3.111696							3.111696		
2017-07-16	28	3.111696							3.111696		
2017-07-23	29	3.111696							3.111696		
2017-07-30	30	3.111696							3.111696		
2017-08-06	31	3.315816							3.315816		
2017-08-13	32	4.31892							4.31892		
2017-08-20	33	5.112072							5.112072		
2017-08-27	34	5.112072							5.112072		
2017-09-03	35	5.112072							5.112072		
2017-09-10	36	5.112072							5.112072		
2017-09-17	37	5.112072							5.112072		
2017-09-24	38	5.112072							5.112072		
2017-10-01	39										
2017-10-08	40										
2017-10-15	41								11.59099	11.590992	
2017-10-22	42								11.26686	11.266857	
2017-10-29	43										
2017-11-05	44		10.33754						10.72764	11.117736	
2017-11-12	45		9.533538						9.381015	9.228492	
2017-11-19	46		7.517059						7.494833	7.4726064	
2017-11-26	47		6.820632						6.820632	6.820632	
2017-12-03	48						5.62464		5.527872	5.334336	
2017-12-10	49						6.138115		6.060096	5.67	
2017-12-17	50						6.571427		6.571427		
2017-12-24	51						6.642821		6.642821		
2017-12-31	52						6.672456		6.672456		
2018-01-07	1						6.672456		6.672456		
2018-01-14	2						5.811826		5.811826		
2018-01-21	3						5.408424		5.408424		
2018-01-28	4						5.766466		5.766466		
2018-02-04	5						5.558112		5.558112		
2018-02-11	6						5.156827		5.156827		
2018-02-18	7						4.978714		4.978714		
2018-02-25	8						4.112942		4.112942		
2018-03-04	9						3.744377		3.744377		
2018-03-11	10						3.490906		3.490906		
2018-03-18	11						3.450807		3.450807		
2018-03-25	12						3.4335		3.4335		
2018-04-01	13										
2018-04-08	14										
2018-04-15	15										
2018-04-22	16										

date	Week	Washington And Oregon	Peru	New Jersey	Georgia	Florida	Chile	California	Average	Argentina And Uruguay	Argentina
2018-04-29	17							5.447736	5.447736		
2018-05-06	18							5.447736	5.447736		
2018-05-13	19					4.55868		5.447736	5.29956		
2018-05-20	20							5.5566	5.5566		
2018-05-27	21							5.334336	5.334336		
2018-06-03	22							4.945374	4.945374		
2018-06-10	23							4.44528	4.44528		
2018-06-17	24							4.44528	4.44528		
2018-06-24	25										
2018-07-01	26	3.429216							3.429216		
2018-07-08	27	2.778867							2.778867		
2018-07-15	28	2.4458112		3.778488					2.566964		
2018-07-22	29	2.4616872		3.669624					2.5715		
2018-07-29	30	2.463804							2.463804		
2018-08-05	31	2.444904							2.444904		
2018-08-12	32	3.3085584							3.308558		
2018-08-19	33	4.30353							4.30353		
2018-08-26	34	5.493096							5.493096		
2018-09-02	35	5.57928							5.57928		
2018-09-09	36	5.924016							5.924016		
2018-09-16	37	5.924016							5.924016		
2018-09-23	38										
2018-09-30	39										
2018-10-07	40										
2018-10-14	41										
2018-10-21	42		8.450568						8.450568	8.450568	8.450568
2018-10-28	43		8.450568						8.450568	8.450568	
2018-11-04	44		8.450568						8.450568	8.450568	
2018-11-11	45		8.450568						8.450568	8.450568	
2018-11-18	46		8.450568				7.588728		8.019648		
2018-11-25	47		7.17255				6.950286		7.061418		
2018-12-02	48		5.914037				5.64732		5.780678		
2018-12-09	49		5.5566				4.889808		5.223204		
2018-12-16	50		5.5566				5.067619		5.31211		
2018-12-23	51		5.045846				4.690224		4.868035		
2018-12-30	52										
2019-01-06	1		5.112072				4.535093		4.631256		
2019-01-13	2		5.24543				4.934563		5.01228		
2019-01-20	3		5.334336				5.18616		5.223204		
2019-01-27	4		5.334336				5.18616		5.223204		
2019-02-03	5		5.024074				4.764614		4.829479		
2019-02-10	6		4.55868				3.983563		4.012319		
2019-02-17	7						3.607481		3.607481		
2019-02-24	8						3.254832		3.254832		
2019-03-03	9						2.983716		2.983716		
2019-03-10	10						2.685312		2.685312		
2019-03-17	11						2.889432		2.889432		
2019-03-24	12					7.805549			7.805549		
2019-03-31	13					7.471699			7.471699		
2019-04-07	14					7.094304			7.094304		
2019-04-14	15					6.770434			6.770434		
2019-04-21	16				6.559963	6.53819			6.549077		
2019-04-28	17				6.004757	5.982984			5.99387		
2019-05-05	18				5.334336	5.247245			5.29079		
2019-05-12	19				3.61179	4.44528		3.33396	3.675905		
2019-05-19	20				2.956565			3.2895072	3.067546		
2019-05-26	21				3.501792			3.6451296	3.549571		
2019-06-02	22				3.085047			3.778488	3.316194		

date	Week	Washington And Oregon	Peru	New Jersey	Georgia	Florida	Chile	California	Average	Argentina And Uruguay	Argentina
2019-06-09	23				3.312641			3.8673936	3.497558		
2019-06-16	24				3.512678			3.7340352	3.586464		
2019-06-23	25			3.906504	3.348135			3.926664	3.68618		
2019-06-30	26	4.265352		3.942238					4.063406		
2019-07-07	27	3.543183		3.993948					3.768566		
2019-07-14	28	3.3802272							3.380227		
2019-07-21	29	3.279528							3.279528		
2019-07-28	30	3.12984							3.12984		
2019-08-04	31	3.0450168							3.045017		
2019-08-11	32	3.111696							3.111696		
2019-08-18	33	3.252312							3.252312		
2019-08-25	34	3.8233944							3.823394		
2019-09-01	35	4.667544							4.667544		
2019-09-08	36	5.322996							5.322996		
2019-09-15	37	5.892264	6.227928						5.948208		
2019-09-22	38	6.058962	6.960038						6.55956		
2019-09-29	39		7.359206						7.359206		
2019-10-06	40		7.003584						6.845472	6.450192	
2019-10-13	41		7.003584						6.726888	6.450192	
2019-10-20	42		6.336792						6.267618	6.198444	
2019-10-27	43		6.582643						6.348586	6.114528	
2019-11-03	44		5.7834						5.626001	5.4686016	
2019-11-10	45		4.859352						4.779432	4.667544	
2019-11-17	46		4.584195						4.463802	4.223016	
2019-11-24	47		4.667544						4.519368	4.223016	
2019-12-01	48		4.667544						4.463802	4.056318	
2019-12-08	49		4.734223						4.356374	3.6006768	
2019-12-15	50		4.000752				3.88962		3.856934	3.33396	
2019-12-22	51		2.178187				2.556036		2.367112		
2019-12-29	52		2.000376				2.556036		2.278206		
2020-01-05	1		2.000376				2.000376		2.000376		
2020-01-12	2		2.000376				2.089282		2.047168		
2020-01-19	3		2.723868				2.334679		2.529274		
2020-01-26	4						3.195612		3.195612		
2020-02-02	5						2.965032		2.965032		
2020-02-09	6						3.112992		3.112992		
2020-02-16	7						3.594024		3.594024		
2020-02-23	8						3.890376		3.890376		
2020-03-01	9						4.631861		4.631861		
2020-03-08	10						4.817232		4.817232		
2020-03-15	11						4.817232		4.817232		
2020-03-22	12					7.625923	5.003662		5.877749		
2020-03-29	13					7.360114	4.96692		6.054735		
2020-04-05	14					6.976368			6.976368		
2020-04-12	15					5.892264			5.892264		
2020-04-19	16				4.667544	5.112072			4.945374		
2020-04-26	17				4.667544	4.667544			4.667544		
2020-05-03	18				3.384864	4.534186		3.33396	3.737664		
2020-05-10	19				3.281796	4.780944		3.33396	3.611133		
2020-05-17	20				3.363444			3.111696	3.279528		
2020-05-24	21				3.363444			3.111696	3.279528		
2020-05-31	22				3.02778			3.05613	3.03723		
2020-06-07	23				3.035038			2.889432	2.986502		
2020-06-14	24				2.990585			3.2450544	3.075408		
2020-06-21	25				2.889432			3.556224	3.222828		
2020-06-28	26	3.111696		3.778488				3.556224	3.495607		
2020-07-05	27	3.482136		4.667544				3.556224	3.919929		
2020-07-12	28	3.7326744		3.69684					3.714757		

date	Week	Washington And Oregon	Peru	New Jersey	Georgia	Florida	Chile	California	Average	Argentina And Uruguay	Argentina
2020-07-19	29	3.749004		3.679603					3.714304		
2020-07-26	30	3.749004							3.749004		
2020-08-02	31	3.6600984							3.660098		
2020-08-09	32	3.4931736							3.493174		
2020-08-16	33	3.4264944							3.426494		
2020-08-23	34	3.5843472							3.584347		
2020-08-30	35	3.9930408							3.993041		
2020-09-06	36	4.136832							4.136832		
2020-09-13	37	4.36023							4.36023		
2020-09-20	38	5.7316896	5.108544						5.331096		
2020-09-27	39	6.692868	5.99886						6.114528		
2020-10-04	40		6.28236						6.28236		
2020-10-11	41		6.800976						6.800976		
2020-10-18	42		6.883758						6.883758		
2020-10-25	43		6.937963						6.802132	5.7834	
2020-11-01	44		6.931008						6.588086	5.5593216	
2020-11-08	45		5.829667						5.650268	5.112072	
2020-11-15	46		4.900014						4.855788	4.72311	
2020-11-22	47		3.7233						3.543416	3.111696	
2020-11-29	48		3.408048						3.223282	2.946132	
2020-12-06	49		3.609446				3.715992		3.667562		
2020-12-13	50		3.499524				3.513586		3.506555		
2020-12-20	51		2.997471				3.16008		3.054863		
2020-12-27	52		2.316006				2.966544		2.532852		
2021-01-03	53		2.286144				2.926287		2.499525		

Agronometrics Movement Volume: Conventional

date	Week	Washington	Uruguay	Uganda	Sum	South Africa	Peru	Oregon	North Carolina	New Zealand	New Jersey	Netherlands	Morocco	Michigan	Mexico	Guatemala	Georgia	Florida	Colombia	Chile	Canada	California-South	California-Central	Argentina
2015-01-04	1				5640000		120000								190000					5330000				
2015-01-11	2				9500000		50000								320000					9130000				
2015-01-18	3				12490000		130000								310000					12050000				
2015-01-25	4				9800000		240000								270000					9290000				
2015-02-01	5				8560000		160000								310000					8090000				
2015-02-08	6				8090000		70000								330000					7690000				
2015-02-15	7				6710000		120000								280000					6310000				
2015-02-22	8				7770000		130000								490000					7150000				
2015-03-01	9				8590000		110000								780000					7700000				
2015-03-08	10				7790000		40000								630000					7090000		10000	20000	
2015-03-15	11				6510000		110000								820000					5510000		50000	20000	
2015-03-22	12				5190000		80000								660000			270000		4060000		40000	80000	
2015-03-29	13				4360000										1290000			980000		1890000		140000	60000	
2015-04-05	14				5130000		180000								1490000			2140000		1010000		140000	170000	
2015-04-12	15				6890000										1780000			3980000		690000		180000	260000	
2015-04-19	16				7890000		60000								1820000			5280000		50000		190000	490000	
2015-04-26	17				8720000										1220000		480000	5810000				150000	1060000	
2015-05-03	18				11450000										1080000		3670000	4090000				130000	2480000	
2015-05-10	19				14310000										830000		7330000	1620000				100000	4430000	
2015-05-17	20				12530000				20000						600000		6150000	460000				100000	5200000	
2015-05-24	21				11070000				2420000						580000		2620000	110000				70000	5270000	
2015-05-31	22				15860000				7460000						230000		3480000					80000	4610000	
2015-06-07	23				16660000				7620000						300000		5470000					60000	3210000	
2015-06-14	24				15850000			1150000	5360000						170000		6680000					10000	2480000	
2015-06-21	25	40000			19830000			3330000	4460000		4350000				100000		5020000				790000		1740000	
2015-06-28	26	290000			23480000		90000	4430000	3490000		9520000				110000		1230000				3370000		950000	
2015-07-05	27	530000			19170000			3490000	1540000		9060000			220000	110000		270000				3950000			
2015-07-12	28	710000			15490000			2740000	740000		6040000			1530000	60000		40000				3630000			
2015-07-19	29	550000			12090000			2270000	700000		2290000			3000000	20000					40000	3220000			
2015-07-26	30	450000			12120000			2780000	310000		1130000			4860000	20000					40000	2530000			
2015-08-02	31	300000			10300000			2240000	90000		300000			5170000	20000					40000	2140000			
2015-08-09	32	570000			10020000			2080000	10000					4570000	10000						2780000			
2015-08-16	33	420000	10000		8070000			1560000						3320000							2760000			
2015-08-23	34	360000	10000		7390000		310000	1460000						2340000		10000					2860000			40000
2015-08-30	35	290000			6090000		480000	1050000						2460000	10000						1790000			10000
2015-09-06	36	160000	50000		5390000		190000	1080000						2680000							1090000			140000
2015-09-13	37	170000	10000		4350000		550000	670000						2320000	50000						370000			210000
2015-09-20	38	70000	30000		2880000		240000	440000						1650000	40000						100000			310000
2015-09-27	39	70000	30000		2410000		390000	210000						1170000	100000						20000			420000
2015-10-04	40	20000	100000		2950000		730000	70000						900000	160000					30000	20000			920000
2015-10-11	41	20000	60000		2010000		480000	50000						160000	190000					50000	10000			990000
2015-10-18	42		200000		2810000		460000								150000					90000				1910000
2015-10-25	43		180000		2810000		240000								270000					110000				2010000
2015-11-01	44		350000		5150000		490000								340000					240000				3730000
2015-11-08	45		210000		4200000		520000								380000					870000				2220000
2015-11-15	46		150000		4160000		330000								370000					390000				2920000
2015-11-22	47		250000		14630000		800000								420000					2050000				11110000
2015-11-29	48		40000		4700000		500000								450000					1870000				1840000
2015-12-06	49		20000		4010000		380000								340000					2100000				1170000
2015-12-13	50		40000		7240000		1620000								330000					4750000				500000
2015-12-20	51				5980000		790000								420000					4570000				200000
2015-12-27	52				14820000		7030000								420000					7080000				290000
2016-01-03	53		10000		4970000		280000								510000					4160000				10000
2016-01-10	1				14620000		590000								710000					13070000				250000
2016-01-17	2				11710000		350000								560000					10670000				130000
2016-01-24	3				10020000		390000								410000					9220000				
2016-01-31	4				14960000		950000								710000					13300000				
2016-02-07	5				12470000		710000								490000					11270000				
2016-02-14	6				12670000		340000								580000					11750000				
2016-02-21	7				12740000		560000								830000					11350000				
2016-02-28	8				9510000		240000								500000					8770000				
2016-03-06	9				6120000		110000								560000					5360000			90000	
2016-03-13	10				6100000		770000								490000					4690000			110000	40000
2016-03-20	11				4130000		230000								960000					2800000			140000	
2016-03-27	12				4430000		210000								1470000					2610000			140000	
2016-04-03	13				2630000		170000								1400000			140000		770000			150000	
2016-04-10	14				3470000		520000								2050000			470000		160000			270000	
2016-04-17	15				3540000		90000			10000			10000		2060000			1030000					340000	
2016-04-24	16				5050000		90000			10000			20000		1650000		290000	1860000					1130000	
2016-05-01	17				8360000		110000						80000		1350000		2410000	3050000					1360000	
2016-05-08	18				11980000				30000						970000		5200000	3380000					2400000	
2016-05-15	19				15260000		40000		1280000						760000		6310000	2430000					4440000	
2016-05-22	20				18080000				4470000						730000		5160000	1020000					6700000	
2016-05-29	21				17960000				5100000						640000		2710000	370000					9140000	
2016-06-05	22				15820000				5100000						520000		2250000						7950000	
2016-06-12	23				16000000			1100000	5090000						370000		4310000						5130000	
2016-06-19	24				19980000			3940000	3230000		2790000				280000		6610000				420000		2710000	
2016-06-26	25				25360000			4960000	3130000		8850000				120000		6130000				1960000	210000		
2016-07-03	26				20680000			4140000	1370000		7450000			420000	50000		1770000				5480000			
2016-07-10	27	1320000			14670000			2570000	770000		4960000			1530000	60000						3460000			
2016-07-17	28	670000			14410000			2900000	260000		3470000			3510000	70000						3530000			
2016-07-24	29	610000			14080000			3150000	200000		1670000			6430000	50000						1970000			
2016-07-31	30	450000			12930000		40000	3580000	40000		230000			6520000							2070000			
2016-08-07	31	780000			11420000		150000	2430000			330000			5350000	30000						2350000			
2016-08-14	32	940000			8290000		30000	1870000			160000			3520000							1770000			
2016-08-21	33	660000			6230000		110000	1510000						2890000	10000						1030000			20000
2016-08-28	34	390000			5820000		100000	1250000						3200000							760000			120000
2016-09-04	35	290000			4530000		240000	880000						2450000						20000	590000			60000
2016-09-11	36	200000			3000000		450000	640000						1530000	20000					10000	130000			20000
2016-09-18	37	180000			2840000		490000	360000						1260000	70000					10000	180000			290000
2016-09-25	38	160000			2080000		490000	190000						600000	100000					10000	10000			520000
2016-10-02	39	70000	30000		4030000		2120000	80000						570000	130000					70000				960000
2016-10-09	40	30000	80000		3450000		770000	20000						30000	270000	10000				110000				2130000
2016-10-16	41	30000	100000		5400000		1660000	100000				20000			350000					300000				2840000
2016-10-23	42	10000	370000		6200000		1100000								500000					420000	30000			3770000
2016-10-30	43		430000		6380000		980000								570000					440000				3960000
2016-11-06	44		360000		5720000		1010000								500000					230000				3620000
2016-11-13	45		290000		6610000		960000								700000					670000				3990000
2016-11-20	46		90000		6150000		2110000								750000					710000				2490000
2016-11-27	47		60000		4160000		1040000								700000					1210000				1150000
2016-12-04	48		20000		8030000		2840000								770000					3620000				780000
2016-12-11	49				10630000		3460000								970000					5810000				390000
2016-12-18	50		20000		13810000		2640000								770000					10040000				340000
2016-12-25	51				14040000		2390000								520000					10950000				180000
2017-01-01	52				12220000		1630000								850000					9740000				
2017-01-08	1				12240000		1130000								1050000					10060000				
2017-01-15	2				8380000		1090000								1010000					6170000				110000
2017-01-22	3				12100000		750000								1000000					10350000				
2017-01-29	4				13150000		560000								780000					11810000				
2017-02-05	5				11070000		460000								960000					9650000				
2017-02-12	6				10490000		340000								1120000					9030000				
2017-02-19	7				12590000		270000								1260000					11060000				
2017-02-26	8				6830000		260000								1200000					5330000	40000			
2017-03-05	9				9920000		170000								1170000			90000		8420000			70000	
2017-03-12	10				6850000		170000								1880000			180000		4360000			260000	
2017-03-19	11				6240000		90000								2650000	50000		290000		2880000			280000	
2017-03-26	12				4830000		110000								2500000	40000		360000		1700000			120000	
2017-04-02	13				4690000		110000								2140000			1790000		470000			180000	
2017-04-09	14				6400000		30000								3030000		330000	2700000		100000			210000	
2017-04-16	15				7370000					20000					3180000		800000	3140000					230000	
2017-04-23	16				9150000										3360000		1870000	3420000					500000	
2017-04-30	17				10320000										2110000		4020000	3270000					920000	
2017-05-07	18				9420000		10000								2210000		3770000	2150000					1280000	

date	Week	Washington	Uruguay	Uganda	Sum	South Africa	Peru	Oregon	North Carolina	New Zealand	New Jersey	Netherlands	Morocco	Michigan	Mexico	Guatemala	Georgia	Florida	Colombia	Chile	Canada	California-South	California-Central	Argentina
2017-05-14	19				8070000				90000						1600000		3070000	1050000					2260000	
2017-05-21	20				12230000				3350000						1360000		2440000	460000					4620000	
2017-05-28	21				10010000				4010000						470000		1130000	200000		60000	80000		4060000	
2017-06-04	22				12720000				5070000						500000		1660000						5490000	
2017-06-11	23				12310000				3680000		290000				440000		1800000			130000	40000		5930000	
2017-06-18	24				13610000				1500000		6080000				450000		1120000						4460000	
2017-06-25	25				11750000				550000		7400000				230000		290000						3280000	
2017-07-02	26				12530000			2470000	580000		7830000			570000	160000		160000						760000	
2017-07-09	27				12460000			3660000	310000		4410000			3250000	120000						710000			
2017-07-16	28	150000			17210000			4010000	80000		3640000			4930000	30000					230000	4140000			
2017-07-23	29	750000			15150000			3090000			1440000			4940000	50000						4870000			10000
2017-07-30	30	280000			14780000			4110000						4750000	40000						5540000			60000
2017-08-06	31	80000			9710000			2650000						3300000	10000						3670000			
2017-08-13	32	230000			9790000			2560000						3140000	20000						3840000			
2017-08-20	33	420000			7920000			2350000						2600000							2540000			10000
2017-08-27	34	1130000			8850000		30000	1890000						2800000							3000000			
2017-09-03	35	890000	10000		7020000		100000	1660000						2390000	20000						1880000			70000
2017-09-10	36	720000	60000		6290000		540000	1260000						2030000	20000						1500000			160000
2017-09-17	37	820000	60000		5540000		840000	1360000						1650000	50000						490000			270000
2017-09-24	38	590000	60000		5190000		1030000	1080000						1460000	160000						140000			670000
2017-10-01	39	460000	20000		5160000		1440000	580000						880000	260000					110000	70000			1340000
2017-10-08	40	190000	140000		6610000		2660000	350000						500000	220000					130000				2420000
2017-10-15	41	70000	220000		7330000		3210000	50000							340000					160000				3280000
2017-10-22	42	70000	120000		7210000		3400000	80000							320000					140000	30000			3050000
2017-10-29	43	30000	50000		8410000		4570000								530000					190000				3040000
2017-11-05	44		110000		7660000		2750000								610000					470000				3720000
2017-11-12	45		80000		7980000		3250000								920000					750000				2980000
2017-11-19	46		90000		7960000		3100000								830000	220000				830000				2890000
2017-11-26	47		20000		4940000		2050000								870000					1250000				750000
2017-12-03	48		10000		6290000		3240000								1000000					1650000				390000
2017-12-10	49				6650000		2410000								1050000					2740000				450000
2017-12-17	50				6820000		2820000								930000					2960000				110000
2017-12-24	51				6740000		1820000								1070000					3740000		70000		40000
2017-12-31	52				6920000		920000								1130000					4840000				30000
2018-01-07	1				8040000		1110000								1290000					5600000		40000		
2018-01-14	2				14330000		1330000								1400000					11570000				30000
2018-01-21	3				11670000		830000								1390000					9430000				20000
2018-01-28	4				9820000		1570000								1400000					6850000				
2018-02-04	5				13360000		2230000								1440000					9660000			30000	
2018-02-11	6				11970000		700000								1160000					10110000				
2018-02-18	7				16760000		330000								1600000					14830000				
2018-02-25	8				9700000		450000								1630000					7570000				50000
2018-03-04	9				9720000		370000								1530000					7820000				
2018-03-11	10				9630000		610000								2080000			30000		6870000	40000			
2018-03-18	11				7960000		720000								2420000			50000		4750000		10000	10000	
2018-03-25	12				14040000		190000								2760000			170000		10920000				
2018-04-01	13				6370000		50000								3060000			850000		2170000		160000	80000	
2018-04-08	14				8990000		40000								3400000			2310000		3190000		20000	30000	
2018-04-15	15				7720000										3420000			3980000		200000		70000	50000	
2018-04-22	16				8240000		10000								3050000		710000	4310000		40000		30000	90000	
2018-04-29	17				10070000		10000								2970000		2330000	4530000				50000	180000	
2018-05-06	18				8570000										2090000		3670000	2520000				20000	270000	
2018-05-13	19				8150000				20000						1740000		4850000	770000				50000	700000	20000
2018-05-20	20				6660000				610000						1570000		2630000	80000		40000		70000	1660000	
2018-05-27	21				8640000				3460000						1250000		1770000			60000		50000	2050000	
2018-06-03	22				8980000				4110000						750000		1340000					20000	2760000	
2018-06-10	23				10430000				5280000						630000		2680000					50000	1790000	
2018-06-17	24				11020000				3720000		370000				500000		3160000					10000	3260000	
2018-06-24	25				13630000			930000	2140000		6930000				270000		1510000			50000			1800000	
2018-07-01	26				16180000			3510000	840000		9720000			100000	220000		720000						1070000	
2018-07-08	27				15450000			3470000	370000		7330000			1590000	80000						1910000		700000	
2018-07-15	28				16450000			3580000	460000		4620000			3240000	90000						4190000		270000	
2018-07-22	29	570000			15590000			3110000	90000		2430000			4500000	10000						4770000		110000	
2018-07-29	30	500000			11300000			2330000			1020000			3690000							3720000		40000	
2018-08-05	31	380000			10020000		190000	1960000			240000			3420000	10000					50000	3770000			
2018-08-12	32	990000			11110000		1030000	2690000						2780000	40000						3580000			
2018-08-19	33	1390000			8500000		190000	2280000						1810000	10000						2820000			
2018-08-26	34	810000			8020000		280000	1830000						1520000	80000						3500000			
2018-09-02	35	700000			7430000		840000	1640000						1700000	60000					40000	2450000			
2018-09-09	36	650000			6310000		920000	1100000						1460000	170000						2000000			10000
2018-09-16	37	340000	10000		4810000		1710000	1310000						650000	190000					40000	490000			70000
2018-09-23	38	140000	10000		3020000		1120000	820000						370000	210000					10000	260000			80000
2018-09-30	39	70000	50000		6220000		4670000	660000							380000					40000	140000			210000
2018-10-07	40		10000		5030000		4180000								340000					50000				450000
2018-10-14	41		70000		3900000		2230000								490000					200000				910000
2018-10-21	42		130000		6290000		3260000								820000					130000				1950000
2018-10-28	43		190000		8580000		4720000								710000					920000				2040000
2018-11-04	44		500000		11520000		5800000								530000					640000				4050000
2018-11-11	45		290000		9070000		5200000								940000					660000				1980000
2018-11-18	46		90000		8840000	30000	6330000								960000					320000				1110000
2018-11-25	47		80000		4830000		2280000								1320000					300000				850000
2018-12-02	48		80000		7750000		3080000								1010000	40000				630000				2910000
2018-12-09	49		10000		7390000		2800000								1450000					2230000				900000
2018-12-16	50				8150000		2330000								1270000					3570000		30000		950000
2018-12-23	51				8890000		2690000								1250000					4860000	40000			50000
2018-12-30	52				7800000		1090000								1070000					5390000				250000
2019-01-06	1				11650000		4840000								1050000					4930000				830000
2019-01-13	2				12650000		3580000								1680000					7390000				
2019-01-20	3				9850000		1150000								1510000					7190000				
2019-01-27	4				9830000		2290000								1690000					5790000				60000
2019-02-03	5				13580000		3180000								1350000					9050000				
2019-02-10	6				14570000		4270000								1260000					9040000				
2019-02-17	7				15020000		6190000								1510000					7320000				
2019-02-24	8				10940000		2610000								1770000					6450000				110000
2019-03-03	9				11850000		1730000								2220000					7900000				
2019-03-10	10				7550000		920000								2320000			140000		4170000				
2019-03-17	11				11760000		840000								2880000			190000		7820000			30000	
2019-03-24	12				6500000		830000								2970000			530000		2090000			20000	60000
2019-03-31	13				7370000		660000								3340000			1430000		1850000		40000	50000	
2019-04-07	14				6960000		350000								3420000			3050000		40000			100000	
2019-04-14	15				10490000		70000								4440000		530000	5350000					100000	
2019-04-21	16				10430000		20000								3590000		2260000	4480000					80000	
2019-04-28	17				11440000										3320000		4400000	3520000					200000	
2019-05-05	18				10700000		100000								2780000		5260000	2130000				20000	410000	
2019-05-12	19				10750000		40000		280000						1810000		6550000	1110000		60000			900000	
2019-05-19	20				12100000		40000		4080000						1230000		4450000	80000				30000	2190000	
2019-05-26	21				12490000		40000		6130000						560000		3060000				40000	30000	2570000	60000
2019-06-02	22				12560000				5520000						320000		3200000			40000			3480000	
2019-06-09	23				13740000				4950000						640000		3480000			50000			4620000	
2019-06-16	24				14120000		70000		2960000		3160000				400000		3800000			80000			3650000	
2019-06-23	25				13830000			410000	1400000		7210000		40000		280000		2300000						2190000	
2019-06-30	26				14620000		40000	3640000	520000		7460000				170000		690000				740000	30000	1330000	
2019-07-07	27				13670000		60000	4890000	260000		4080000			80000	80000						3350000		870000	
2019-07-14	28	150000			12770000		70000	4800000	10000		1640000			1330000	90000						4260000		420000	
2019-07-21	29	880000			13170000		40000	4210000			850000			2460000	50000						4400000		280000	
2019-07-28	30	730000			14000000			5060000			190000			3520000	20000						4420000		50000	10000
2019-08-04	31	870000			12190000		190000	3360000						4000000	10000	20000				240000	3480000		10000	10000
2019-08-11	32	1120000			11800000		1230000	2570000						4010000	60000						2790000		10000	10000
2019-08-18	33	1100000			9390000		460000	2990000						2490000	60000						2280000			10000
2019-08-25	34	900000			8970000		660000	2450000						2630000	40000	20000					2250000			20000
2019-09-01	35	820000			8990000		1710000	2080000						2500000	100000					50000	1670000			60000
2019-09-08	36	620000			5770000		450000	1250000						2100000	200000					60000	980000			110000
2019-09-15	37	570000	20000		8940000		5150000	940000						1530000	370000	30000				30000	230000			70000
2019-09-22	38	370000	10000		8520000		5230000	680000						1330000	490000					70000	20000			320000

date	Week	Washington	Uruguay	Uganda	Sum	South Africa	Peru	Oregon	North Carolina	New Zealand	New Jersey	Netherlands	Morocco	Michigan	Mexico	Guatemala	Georgia	Florida	Colombia	Chile	Canada	California-South	California-Central	Argentina
2019-09-29	39	260000	20000	10000	7550000		4250000	450000						1490000	640000	20000				180000				230000
2019-10-06	40	30000	60000		9370000		6590000	190000						800000	740000					260000				700000
2019-10-13	41	40000	20000		9910000		7660000	90000							940000					250000				910000
2019-10-20	42		10000		6380000		3760000	20000							1010000	110000				560000				910000
2019-10-27	43		80000		10000000		6590000								1400000					430000				1500000
2019-11-03	44		60000		7470000		2520000								1670000					760000				2460000
2019-11-10	45		270000		6050000		2290000								1320000					590000				1580000
2019-11-17	46		190000		5920000		2550000								1370000					320000				1490000
2019-11-24	47		150000		5750000		2660000								1390000					300000				1250000
2019-12-01	48		50000		8640000		2080000								1560000					3420000				1530000
2019-12-08	49		30000		6460000		2110000								2040000					1780000				500000
2019-12-15	50		10000		8590000		2630000								1440000					4180000				330000
2019-12-22	51				4640000		1900000								1440000					1230000		10000		60000
2019-12-29	52				7900000		1700000								1480000					4570000		10000		140000
2020-01-05	1				8050000		470000								1430000					6130000				20000
2020-01-12	2				9880000		1230000								2180000					6470000				
2020-01-19	3				13050000		4580000								2140000					6330000				
2020-01-26	4				7780000		460000								1990000					5330000				
2020-02-02	5				12390000		460000								1960000					9970000				
2020-02-09	6				10150000		500000								1890000					7760000				
2020-02-16	7				9460000		290000								2460000					6710000				
2020-02-23	8				7820000		280000								2680000					4860000				
2020-03-01	9				7850000		950000								3140000					3760000				
2020-03-08	10				8050000		80000								3320000			110000		4540000				
2020-03-15	11				6770000		220000								3690000			340000		2510000			10000	
2020-03-22	12				7250000		50000						20000		4700000			1130000		1320000		10000	20000	
2020-03-29	13				8370000								30000		4160000			2310000		1810000		30000	30000	
2020-04-05	14				7940000										4770000		70000	2930000		140000			30000	
2020-04-12	15				9250000		30000						60000		5250000		690000	3150000		20000			50000	
2020-04-19	16				11090000										5920000		1740000	3250000					180000	
2020-04-26	17				11160000										5260000		3790000	1560000			40000	30000	480000	
2020-05-03	18				11930000										4920000		4660000	1160000				20000	1170000	
2020-05-10	19				9610000				620000						2650000		4100000	320000				30000	1890000	
2020-05-17	20				10870000				2110000						2570000		3340000					30000	2820000	
2020-05-24	21				12500000				2500000						2000000		3190000					30000	4780000	
2020-05-31	22				13340000				3660000						1700000		2690000						5290000	
2020-06-07	23				14010000				3700000						1450000		3560000						5300000	
2020-06-14	24				9220000				2880000						1060000		1140000						4140000	
2020-06-21	25				7120000			300000	930000		2840000				720000		380000					50000	1900000	
2020-06-28	26	50000			15000000		50000	2790000	750000		10360000				360000		220000					20000	400000	
2020-07-05	27				16460000		60000	6600000	540000		8540000			110000	310000		10000						290000	
2020-07-12	28				12340000			6140000	190000		3990000			1060000	160000						590000		210000	
2020-07-19	29	450000			14980000			5430000			3070000			3320000	160000						2480000		70000	
2020-07-26	30	750000			14330000			4340000	90000		650000			4620000	90000						3770000		20000	
2020-08-02	31	900000			12040000		880000	3470000			290000			3030000	50000						3420000			
2020-08-09	32	760000			9850000		840000	2480000						2650000	40000						3080000			
2020-08-16	33	1090000			10440000		190000	2510000						3330000	70000						3250000			
2020-08-23	34	1090000			10250000		520000	2920000						2570000	100000					10000	3040000			
2020-08-30	35	940000			15870000		6970000	2580000						2240000	150000					10000	2970000	10000		
2020-09-06	36	1070000	20000		11380000		2810000	2070000						1800000	260000					20000	3300000			30000
2020-09-13	37	560000	10000		7420000		1450000	1380000						800000	360000					180000	2560000			120000
2020-09-20	38	260000	10000		6490000		2410000	960000						480000	520000					10000	1800000			40000
2020-09-27	39	130000	10000		3930000		1980000	470000							720000					100000	370000	20000		130000
2020-10-04	40	160000	40000		16950000		14720000	190000							820000					100000	150000	160000	20000	590000
2020-10-11	41	30000	60000		3470000		1520000	60000							1040000					70000	110000	150000		430000
2020-10-18	42				11230000		8820000								1220000	10000				380000		150000		650000
2020-10-25	43		60000		18980000		15190000								1360000					290000		30000	20000	2030000
2020-11-01	44		90000		6070000		3250000								1560000					200000			10000	960000
2020-11-08	45		20000		4400000		1870000								1490000					250000				770000
2020-11-15	46		30000		5700000		3090000								1620000					210000				750000
2020-11-22	47		40000		4760000		2020000								1800000					330000				570000
2020-11-29	48		230000		7660000		4170000								1710000					960000				590000
2020-12-06	49		20000		17350000		10860000								1830000				70000	2710000				1860000
2020-12-13	50		80000		15900000		9480000								1920000				50000	2760000				1610000
2020-12-20	51		30000		13970000		7430000								2230000					3580000				700000
2020-12-27	52		30000		4300000		1340000								1640000					1290000				
2021-01-03	53		30000		5030000		390000								1470000					3100000	40000			

Agronometrics Movement Volume: Organic

date	Week	Washington	Sum	Oregon	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	California-South	California-Central
2015-01-04	1												
2015-01-11	2												
2015-01-18	3												
2015-01-25	4												
2015-02-01	5												
2015-02-08	6												
2015-02-15	7												
2015-02-22	8												
2015-03-01	9												
2015-03-08	10		40000									30000	10000
2015-03-15	11		110000									50000	60000
2015-03-22	12		130000									100000	30000
2015-03-29	13		150000									80000	70000
2015-04-05	14		220000									140000	80000
2015-04-12	15		390000							90000		180000	120000
2015-04-19	16		640000							120000		230000	290000
2015-04-26	17		940000							150000		260000	530000
2015-05-03	18		980000						10000	110000		190000	670000
2015-05-10	19		850000						30000	20000		160000	640000
2015-05-17	20		1120000						100000	10000		110000	900000
2015-05-24	21		720000		40000				60000			170000	450000
2015-05-31	22		770000		100000				100000			140000	430000
2015-06-07	23		1050000		310000				220000			100000	420000
2015-06-14	24	380000	1170000		190000				210000			30000	360000
2015-06-21	25	1420000	1990000		70000	70000			240000				190000
2015-06-28	26	1180000	1510000		10000	100000			140000				80000
2015-07-05	27	1210000	1380000			90000			80000				
2015-07-12	28	690000	790000			80000			20000				
2015-07-19	29	950000	1020000						70000				
2015-07-26	30	810000	820000				10000						
2015-08-02	31	560000	560000										
2015-08-09	32	500000	500000										
2015-08-16	33	340000	340000										
2015-08-23	34	300000	330000	30000									
2015-08-30	35	400000	420000	20000									
2015-09-06	36	250000	260000	10000									
2015-09-13	37	140000	140000										
2015-09-20	38	30000	30000										
2015-09-27	39	30000	30000										
2015-10-04	40												
2015-10-11	41												
2015-10-18	42												
2015-10-25	43												
2015-11-01	44												
2015-11-08	45												
2015-11-15	46												
2015-11-22	47												
2015-11-29	48												
2015-12-06	49												
2015-12-13	50												
2015-12-20	51		30000								30000		
2015-12-27	52												
2016-01-03	53		30000								30000		
2016-01-10	1												
2016-01-17	2												
2016-01-24	3												
2016-01-31	4												
2016-02-07	5												
2016-02-14	6												
2016-02-21	7												
2016-02-28	8												
2016-03-06	9		10000										10000
2016-03-13	10		10000										10000
2016-03-20	11		10000										10000
2016-03-27	12		10000										10000
2016-04-03	13		20000										20000

date	Week	Washington	Sum	Oregon	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	California-South	California-Central
2016-04-10	14		50000										50000
2016-04-17	15		260000										260000
2016-04-24	16		600000							10000			590000
2016-05-01	17		790000						10000	50000			730000
2016-05-08	18		1080000						80000	120000			880000
2016-05-15	19		1210000						40000	130000			1040000
2016-05-22	20		1570000		50000				30000	60000			1430000
2016-05-29	21		1750000		70000				10000				1670000
2016-06-05	22		1300000		200000				80000				1020000
2016-06-12	23	540000	1440000		120000				190000				590000
2016-06-19	24	470000	1250000		110000	50000			280000				340000
2016-06-26	25	1460000	1830000		70000	60000			220000			20000	
2016-07-03	26	1620000	1890000			110000			160000				
2016-07-10	27	1630000	1680000			50000							
2016-07-17	28	1320000	1360000				40000						
2016-07-24	29	1740000	1750000				10000						
2016-07-31	30	1380000	1380000										
2016-08-07	31	1340000	1340000										
2016-08-14	32	680000	680000										
2016-08-21	33	780000	780000										
2016-08-28	34	660000	660000										
2016-09-04	35	390000	390000										
2016-09-11	36	240000	240000										
2016-09-18	37	250000	250000										
2016-09-25	38	160000	160000										
2016-10-02	39	110000	110000										
2016-10-09	40	100000	100000										
2016-10-16	41	180000	180000										
2016-10-23	42												
2016-10-30	43												
2016-11-06	44												
2016-11-13	45												
2016-11-20	46												
2016-11-27	47												
2016-12-04	48												
2016-12-11	49												
2016-12-18	50												
2016-12-25	51												
2017-01-01	52												
2017-01-08	1												
2017-01-15	2												
2017-01-22	3												
2017-01-29	4												
2017-02-05	5												
2017-02-12	6												
2017-02-19	7												
2017-02-26	8												
2017-03-05	9		300000										300000
2017-03-12	10		500000										500000
2017-03-19	11		1050000										1050000
2017-03-26	12		310000							20000			290000
2017-04-02	13		380000							30000			350000
2017-04-09	14		550000							40000			510000
2017-04-16	15		640000							30000			610000
2017-04-23	16		600000						30000	60000			510000
2017-04-30	17		810000						20000	50000			740000
2017-05-07	18		1340000						110000	150000			1080000
2017-05-14	19		1780000						60000	130000			1590000
2017-05-21	20		1600000						60000	70000			1470000
2017-05-28	21		830000						40000	60000			730000
2017-06-04	22		1090000						80000				1010000
2017-06-11	23		820000		10000				50000				760000
2017-06-18	24		600000		40000	110000			60000				390000
2017-06-25	25		570000			140000			20000				410000
2017-07-02	26	1030000	1320000			150000			40000				100000
2017-07-09	27	1950000	2010000	10000		40000	10000						
2017-07-16	28	1210000	1290000	60000		10000	10000						

date	Week	Washington	Sum	Oregon	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	California-South	California-Central
2017-07-23	29	750000	790000			20000	20000						
2017-07-30	30	690000	690000										
2017-08-06	31	690000	690000										
2017-08-13	32	770000	770000										
2017-08-20	33	720000	720000										
2017-08-27	34	690000	690000										
2017-09-03	35	850000	850000										
2017-09-10	36	700000	700000										
2017-09-17	37	530000	530000										
2017-09-24	38	160000	160000										
2017-10-01	39	90000	90000										
2017-10-08	40	80000	80000										
2017-10-15	41	60000	60000										
2017-10-22	42	10000	10000										
2017-10-29	43												
2017-11-05	44												
2017-11-12	45												
2017-11-19	46												
2017-11-26	47												
2017-12-03	48												
2017-12-10	49												
2017-12-17	50		20000									20000	
2017-12-24	51		180000									180000	
2017-12-31	52		80000									80000	
2018-01-07	1		100000									100000	
2018-01-14	2		130000									130000	
2018-01-21	3		180000									160000	20000
2018-01-28	4		130000									130000	
2018-02-04	5		140000									140000	
2018-02-11	6		240000									220000	20000
2018-02-18	7		260000									230000	30000
2018-02-25	8		220000									220000	
2018-03-04	9		180000									150000	30000
2018-03-11	10		230000									220000	10000
2018-03-18	11		400000									310000	90000
2018-03-25	12		440000							10000		340000	90000
2018-04-01	13		650000							10000		570000	70000
2018-04-08	14		700000							50000		590000	60000
2018-04-15	15		830000							60000		670000	100000
2018-04-22	16		760000							70000		540000	150000
2018-04-29	17		870000						20000	110000		470000	270000
2018-05-06	18		1370000						200000	160000		460000	550000
2018-05-13	19		1210000						70000	40000		410000	690000
2018-05-20	20		1470000		10000				70000	50000		300000	1040000
2018-05-27	21		1080000		70000				10000			340000	660000
2018-06-03	22		970000		150000				70000			160000	590000
2018-06-10	23		550000		90000				70000			120000	270000
2018-06-17	24		830000		180000				100000			110000	440000
2018-06-24	25	200000	830000		80000	80000			50000			100000	320000
2018-07-01	26	1230000	2060000	200000		140000			140000			30000	320000
2018-07-08	27	1180000	1900000	240000	10000	90000							380000
2018-07-15	28	1080000	1350000			40000							230000
2018-07-22	29	1040000	1510000	340000		20000							110000
2018-07-29	30	1230000	1240000			10000							
2018-08-05	31	800000	800000										
2018-08-12	32	710000	1010000	300000									
2018-08-19	33	390000	900000	510000									
2018-08-26	34	290000	750000	460000									
2018-09-02	35	360000	660000	290000									10000
2018-09-09	36	220000	570000	340000								10000	
2018-09-16	37	360000	450000	80000									10000
2018-09-23	38	180000	190000									10000	
2018-09-30	39	130000	180000	30000								20000	
2018-10-07	40		20000									20000	
2018-10-14	41		20000									20000	
2018-10-21	42		20000									10000	10000
2018-10-28	43		10000										10000

date	Week	Washington	Sum	Oregon	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	California-South	California-Central
2018-11-04	44												
2018-11-11	45												
2018-11-18	46												
2018-11-25	47												
2018-12-02	48												
2018-12-09	49												
2018-12-16	50		10000									10000	
2018-12-23	51		20000									20000	
2018-12-30	52		10000									10000	
2019-01-06	1		30000									30000	
2019-01-13	2		70000									70000	
2019-01-20	3		60000									60000	
2019-01-27	4		90000									90000	
2019-02-03	5		110000									110000	
2019-02-10	6		150000									150000	
2019-02-17	7		150000									140000	10000
2019-02-24	8		180000									160000	20000
2019-03-03	9		250000									210000	40000
2019-03-10	10		290000									260000	30000
2019-03-17	11		430000							10000		360000	60000
2019-03-24	12		540000							20000		430000	90000
2019-03-31	13		750000							60000		520000	170000
2019-04-07	14		830000							90000		490000	250000
2019-04-14	15		840000						10000	110000		480000	240000
2019-04-21	16		810000						60000	90000		420000	240000
2019-04-28	17		1160000						210000	110000		310000	530000
2019-05-05	18		1490000						350000	110000		340000	690000
2019-05-12	19		1810000						630000	50000		360000	770000
2019-05-19	20		2020000						560000	50000		380000	1030000
2019-05-26	21		1750000		100000				240000			420000	990000
2019-06-02	22		1960000		170000				230000			350000	1210000
2019-06-09	23		1790000		150000				120000			300000	1220000
2019-06-16	24		1610000		140000	60000			290000			300000	820000
2019-06-23	25	300000	1370000		60000	190000			260000			130000	430000
2019-06-30	26	1070000	1580000			160000			240000			20000	90000
2019-07-07	27	2200000	2350000			20000							130000
2019-07-14	28	1620000	2310000	540000		10000							140000
2019-07-21	29	1470000	1830000	90000									270000
2019-07-28	30	1170000	1990000	680000									140000
2019-08-04	31	1020000	1870000	780000									70000
2019-08-11	32	920000	1680000	760000									
2019-08-18	33	1000000	1680000	670000									10000
2019-08-25	34	620000	1370000	740000									10000
2019-09-01	35	540000	1060000	520000									
2019-09-08	36	590000	1060000	450000									20000
2019-09-15	37	320000	640000	270000								30000	20000
2019-09-22	38	120000	380000	180000								60000	20000
2019-09-29	39	10000	170000	60000								60000	40000
2019-10-06	40		160000	20000								100000	40000
2019-10-13	41	20000	180000	10000								90000	60000
2019-10-20	42		90000									60000	30000
2019-10-27	43		110000									70000	40000
2019-11-03	44		30000									20000	10000
2019-11-10	45		10000									10000	
2019-11-17	46		10000									10000	
2019-11-24	47		10000									10000	
2019-12-01	48		10000									10000	
2019-12-08	49		20000									20000	
2019-12-15	50		30000									30000	
2019-12-22	51		20000									20000	
2019-12-29	52		30000									30000	
2020-01-05	1		80000									80000	
2020-01-12	2		130000									120000	10000
2020-01-19	3		150000									140000	10000
2020-01-26	4		110000									100000	10000
2020-02-02	5		290000									270000	20000
2020-02-09	6		500000									480000	20000

date	Week	Washington	Sum	Oregon	North Carolina	New Jersey	Michigan	Mexico	Georgia	Florida	Chile	California-South	California-Central
2020-02-16	7		400000									390000	10000
2020-02-23	8		540000									500000	40000
2020-03-01	9		380000									330000	50000
2020-03-08	10		520000									470000	50000
2020-03-15	11		530000							40000		410000	80000
2020-03-22	12		440000							90000		340000	10000
2020-03-29	13		510000					20000		50000		400000	40000
2020-04-05	14		720000					20000		140000		480000	80000
2020-04-12	15		1080000					40000	60000	90000		640000	250000
2020-04-19	16		1240000						70000	100000		700000	370000
2020-04-26	17		1610000						250000	80000		680000	600000
2020-05-03	18		2180000					10000	520000	150000		650000	850000
2020-05-10	19		3200000						480000	60000		770000	1890000
2020-05-17	20		2990000						450000			520000	2020000
2020-05-24	21		3030000						380000			560000	2090000
2020-05-31	22		2960000		120000				240000			560000	2040000
2020-06-07	23		2790000		140000				570000			430000	1650000
2020-06-14	24		1900000		110000				290000			340000	1160000
2020-06-21	25	570000	1450000		50000	60000			90000			150000	530000
2020-06-28	26	1630000	2110000		10000	130000			130000			70000	140000
2020-07-05	27	2300000	3420000	640000		180000			60000			60000	180000
2020-07-12	28	2170000	3800000	700000		790000						40000	100000
2020-07-19	29	3050000	4120000	1040000								20000	10000
2020-07-26	30	2350000	3390000	1020000								20000	
2020-08-02	31	2090000	3130000	950000								80000	10000
2020-08-09	32	960000	1800000	800000								30000	10000
2020-08-16	33	860000	1600000	720000								20000	
2020-08-23	34	1050000	1760000	710000									
2020-08-30	35	770000	1670000	890000								10000	
2020-09-06	36	790000	1340000	520000								20000	10000
2020-09-13	37	320000	670000	310000								20000	20000
2020-09-20	38	120000	520000	310000								70000	20000
2020-09-27	39	160000	230000	30000								40000	
2020-10-04	40	120000	200000	10000								70000	
2020-10-11	41	60000	160000	50000								40000	10000
2020-10-18	42		80000									80000	
2020-10-25	43		30000									30000	
2020-11-01	44		60000									60000	
2020-11-08	45		60000									50000	10000
2020-11-15	46		50000									50000	
2020-11-22	47		60000									60000	
2020-11-29	48		130000									70000	60000
2020-12-06	49		100000									90000	10000
2020-12-13	50		120000									110000	10000
2020-12-20	51		120000									80000	40000
2020-12-27	52		100000									80000	20000
2021-01-03	53		110000									110000	

EXHIBIT 1

Fresh, Chilled, or Frozen Blueberries

Commission Questions to American Blueberry Growers Alliance

I. Questions Regarding Conditions of Competition

A. Imports As A Complement To Domestic Production

1. COMMISSIONER STAYIN: The respondents claim that the imports are a complement to U.S. production -- that the products comes in in a counter-seasonal way and does not really compete with the U.S. production. What is your response to that? (Tr. at 129)

Response:

The claim made repeatedly by those in opposition that imported blueberries and domestically-produced blueberries are complements in the market is based on two critical assumptions: (1) that imported blueberries are in the market at entirely different times of the year; and (2) that this year-around supply creates higher, year-round demand. Although there may be some validity to the second point (although no empirical demonstration of this argument has been submitted), the first assumption certainly does not hold true. As is set forth in detail in the Economic Appendix (pages 1-4), imported blueberry volumes have surged during the critical shoulder periods, when U.S. blueberry producers have made most (if not all) of their profits. Moreover, the complementarity argument completely glosses over the fact that Canadian blueberries are in the market in large volumes during the U.S. peak season. Finally, this argument completely ignores the impact of oversupplied imported fresh blueberries and imported frozen blueberries on the U.S. frozen market. Because frozen blueberries have a shelf life of at least two years, there is no counter-seasonality argument for imports. Moreover, even the seasonal imports of fresh blueberries when there is no U.S. fresh product on the market can negatively impact the frozen segment. If oversupplies of imported fresh blueberries are diverted

into the frozen market, these counter-seasonal imports will have an adverse impact on the domestic industry.

B. Regional Sales Distribution

2. COMMISSIONER SCHMIDTLEIN: What is the information that we have on the record about regional sales distribution? So this question about are blueberries growing on the west coast primarily sold on the West Coast or do they compete with blueberries grown in other parts of the country like Michigan or Georgia to the extent those harvest seasons overlap? (Tr. at 142)

COMMISSIONER SCHMIDTLEIN: Right, and so it sounds like that from a grower's standpoint, the domestic growers you are not, you know, Georgia is not shipping blueberries to the West Coast. (Tr. at 146)

Response:

The Alliance was able to obtain data from the California Blueberry Commission ("CBC") on the state's blueberry shipments by state of destination. These data, summarized below, suggest that increasing shipments from California did not cause stress to East Coast suppliers during the summer or fall. First, as shown in the table below, the vast majority of domestic shipments of California-grown blueberries are consumed in the Pacific Coast and other Western markets. In 2019, approximately two-thirds of California's blueberries were consumed in western markets. Second, the growth in California's output during the POI was consumed in the West. Western markets absorbed 11.4 million pounds of increased California blueberries while other U.S. markets saw their consumption fluctuate, declining by 1.3 million pounds over the period covered.

Table 1. Shipments of California Blueberries by State of Destination[1]

	2015-16	2016-17	2017-18	2018-19	Difference
	Pounds				
West of Rockies	26,774,528	29,515,282	34,947,461	38,173,013	11,398,485
Other U.S. markets	19,719,443	21,415,143	17,561,235	18,383,133	(1,336,310)
Total	46,493,971	50,930,425	52,508,697	56,556,145	10,062,175
	Share of total				**% points**
West of Rockies	57.6%	58.0%	66.6%	67.5%	9.9%
Other U.S. markets	42.4%	42.0%	33.4%	32.5%	-9.9%
Total	100.0%	100.0%	100.0%	100.0%	

This is important, because unlike Pacific Northwest ("PNW") markets whose growers begin harvesting in June, California does ship blueberries during the Spring season.[2] However, given that the increased California production since the beginning of the POI has been consumed out west, and that California's peak shipments occur in May and June, the likelihood of California blueberries causing significant harm to East Coast growers during the spring shoulder is remote. This is a complete refutation of Dr. Prusa's hypothesis that the domestic industry has been injured by West Coast shipments because it means that there has been little-to-no increase in eastward shipments from the only member of his triumvirate that could have supplied increasing quantities of blueberries to the East Coast during the spring shoulder.[3]

The CBC data also cast doubt on the proposition that California blueberries caused injury in Michigan's major markets. The CBC data indicate that California shipments to the Midwest

[1] Sources: California Destination Reports, attached hereto as **Exhibit 16,** and California Blueberry Commission Annual Report (2018-2019) attached hereto as **Exhibit 49.**

[2] Staff Report at Table I-3. *See also* Declaration of [ ], attached at Exhibit 10.

[3] Although we do not adopt or agree with Dr. Prusa's regression methodology or results, we do note that his coefficient for the price impact of West Coast quantities during the spring "phase 2" is positive, with a high magnitude. This implies that California quantities during the Spring are associated with a higher U.S. AUV and, therefore, could not contribute any downward pressure on the early season crops of the East Coast growers.

Region increased by almost 1.4 million pounds. The extent to which this occurred during Michigan's growing season cannot be estimated precisely. However, even if all of that growth did occur during Michigan's growing season, the magnitude of this growth pales in comparison to the expansion of imports from Canada over the POI, which totaled 32.5 million pounds.[4]

Although similar data on state shipments by destination are not available for Oregon and Washington, the data in the record indicate that producers tend to be focused on Western markets more than Eastern markets. For example, out of [ ] usable responses from Oregon and Washington, [ ] sold fresh to the Pacific Coast, and [ ] indicated sales to all regions.[5] In addition, Rex Schultz, owner of Heritage Blueberries and President, Michigan Blueberry Advisory Committee, testified that he does not see blueberries from Washington and Oregon in a significant presence in markets where his products are sold.[6] Similarly, Shelly Hartman of True Blue Farms in Michigan and Vice Chair of the Board of the U.S. Highbush Blueberry Council testified that Michigan production has not been harmed by PNW shipments but by imports from Canada and, increasingly, Peru.[7] As West Coast marketer, Mr. Scarborough testified, to the extent West Coast fruit comes East, it usually happens in limited windows during the year.[8] Moreover, although Mr. Bjorn claimed that 80 percent of Driscoll's fruit went east of

[4] Table 6.

[5] Responses to U.S. Producers' Questionnaire, Question IV-9.

[6] Tr. at 90 (Mr. Schultz).

[7] Tr. at 95-6 (Ms. Hartman).

[8] Tr. at 146-47 (Mr. Scarborough).

the Rocky Mountains,[9] it is not clear if that applies to all Driscoll's types of fruit (which are extensive),[10] berry mixes, or just blueberries.

C. Role of Marketers/Distribution Chain/Growers as Price Takers

3. COMMISSIONER SCHMIDTLEIN: I want to go back to what I was discussing the first round, which was just trying to understand the industry and the distribution and sales there. And one of the things that you all discussed in the presentation was the marketers, which we talked about a little bit, but the fact that growers are price-takers and that they must accept the prices that the marketer can obtain or not sell the product.

And so I heard you say during the presentation that, you know, they're just trying to drive volume. But it did make me wonder, well, wouldn't they benefit from higher sale prices since they are working off of commission? So can you all just sort of I guess straighten me out here on how this works with the marketers and how they're incentivized and whether growers really only have access to one marketer when they're trying to sell their product or is there multiple, you know, marketers that one grower can go to? (Tr. at 183-84)

COMMISSIONER KARPEL: What's drawing imports into the market. Is it just the marketers thinking that they have retailers who want more volume than domestic producers can supply, or are they trying to increase supply so they can just move more volume? What's really driving the importation? (Tr. at 190)

Response:

In his declaration attached at **Exhibit 5**, Jayson Scarborough explains why commission agents prioritize volume over price. Briefly, while individual commission agents have very little control over price, their marketing efforts can affect the volume of product that they sell. This is true of all commission agents, but is particularly true for highly perishable products like blueberries, where inventories must be rapidly liquidated, making it very difficult for commission agents to have any substantial influence over price. Finally, the incentive to prioritize import volume over U.S. prices is even stronger for shipper/marketers like Driscoll's,

[9] Transcript at 415 (Mr. Bjorn).

[10] *See* Driscoll's Product Guide, 2019 – 2020, attached hereto as Exhibit 11.

which charge a higher percentage commission for imports and also have major investments in foreign production.[11] Higher import volumes not only lead to higher commissions, but also to greater returns on their foreign investments.

4. COMMISSIONER KARPEL: Do importers and foreign producers use marketers to sell their products in the United States, and are they using the same marketers as domestic producers? (Tr. at 189)

COMMISSIONER KARPEL: And are the marketers in a similar relationship with respect to imports as they are with domestic product? I've heard you say that the marketers don't take ownership of the product. The producers hold the ownership of that product. The marketer's just selling it for them. Is it the same on the import side for marketers? (Tr. at 191)

Response:

To really understand the role of the big marketers in the United States, particularly the big marketers that appeared at the hearing in opposition to safeguard relief, it is essential to have an accurate understanding of just how many hats these marketers wear in the U.S. market. When reviewing the facts as outlined below, it becomes clear that these marketers (1) have a stronger interest in importing than in buying from domestic growers; (2) have significant ownership interests in foreign blueberry production; (3) [

]; (4) are in a position to manipulate and control the timing and pricing of sales of blueberries produced by U.S. growers, as well as their own imports into the United States; (5) earn higher commissions on their sales of imported blueberries than they do on their sales of domestically-grown blueberries; and (6) are in a position to force growers to accept whatever price is dictated to them.

As noted by Mr. Scarborough,[12] many U.S. marketers are actually the importers. Importers' Questionnaire Responses indicate that [

[11] See Declarations of Shelly Hartmann at Exhibit 4 and Jayson Scarborough at Exhibit 5.

[12] Tr. at 189-90

].[13] The [

].[14]

Moreover, many of these same marketers have ownership interests in, or close economic ties with, the growers, packers, and exporters in the exporting countries. This is in addition to their relationships, as marketers, for growers in the United States. For example:

- [

].[15] [

].[16] In addition to [

].[17] [

].[18]

[

[13] Importers' Questionnaire Responses at Questions II-6 to II-12. [

].

[14] *Id.*

[15] [ ].

[16] Confidential Declaration of [ ] at para. 5, attached hereto as Exhibit 10**.**

[17] [ ].

[18] [

].

].[19] [

].[20] As noted by domestic witnesses at the hearing, prices in the frozen market are typically much lower than in the fresh market.

- [

].[21] [

]. Although [

],[22] [ ].[23] Instead, [

].

[

[19] [ ].

[20] [ ]. Mr. Bjorn also stated that "most of the blueberries we sell in Driscoll's, in the Driscoll's label, come from proprietary genetics. So that is genetics that we own or we have the exclusive rights to. That means that no other growers can grow it unless they're with Driscoll's, okay? We place the orders for all those plants." Mr. Bjorn, Tr. at 377.

[21] [ ].

[22] Tr. at 274.

[23] In [

].

].[24] This is what is known in the industry as "farming the farmer." Essentially, the growers, "owe their soul to the company store."

[

][25]

The notifications for [ ] **Exhibit 47**. [ ].

- [ ].[26] [ ].[27] [ ].[28] [ ].[29] As a result of [ ][30].

[24] [ ] **Exhibit 18**.

[25] [ ]

[26] [ ].

[27] [ ].

[28] [ ].

[29] [ ].

[30] [ ]

[

].[31] Moreover, as the [

].[32]

- [

].[33] [

].[34]

- [

].[35] [

].

- [

].[36] [

].[37]

---

[31] [

].

[32] *See* **Exhibit 18.**

[33] [ ].

[34] [

].

[35] [ ].

[36] [ ].

[37] [ ].

To put the marketers' true interests into perspective, it is helpful to compare the amount of domestic fresh blueberries they sell with the amount of foreign blueberries that they sell. This is reflected in the table below.

Large Marketer Purchases of Domestic Vs. Imported Fresh Blueberries in 2019 (Pounds)

	Domestic	Foreign	Share of Foreign Sales
[			]
[			]
[			]
[			]
[			]
[			]

Sources: [ ].

As this table makes clear, the share of the big marketers' sales of foreign fresh blueberries accounted for between [ ] percent of their total sales in the United States in 2019. Thus, from a [ ] standpoint, it is obvious that [ ] blueberries.

Moreover, the marketers that also own blueberry growing operations overseas have a vested interest in ensuring that their own blueberries find a market in the United States, even at the expense of the blueberries produced by the domestic growers for whom they market. As was noted at the hearing, the marketers never take title to the fresh domestic blueberries that they sell, and U.S. growers retain ownership (and assume all the risk) until the blueberries are sold at the retail level.[38] However, [

[38] *See* Responses to Question from Commissioner Karpel (Tr. at 191-92); *see also*, AGBA's Prehearing Brief at 12.

].

In addition, the marketers earn higher commissions on the product that they import than on the product that they market for domestic producers. As noted by Ms. Lee at the hearing:

> There's also a disparity in the commissions charged to a domestic grower versus a non-domestic grower, and many times the commission is higher to the fruit that they're importing. So, you know, it also helps with the margins. They're pushing more volume, but their commission is higher on non-domestic fruit.[39]

At the hearing, Mr. Bjorn stated that "on average, worldwide, 85 percent of the revenue we collect from the market goes to the grower, and 15 percent of that revenue goes to Driscoll's to pay for all the things we do."[40] Information from domestic growers indicates that Driscoll's charges U.S. growers between 8 and 10 percent for marketing their blueberries.[41] This means that the commissions paid by Driscoll's on its imported product are likely to be in the range of 20 percent or more. For this reason, importers have a strong incentive to sell imported blueberries,

[39] Tr. at 192 (Ms. Lee).

[4040] *Id.* at 378 (Mr. Bjorn)

[41] *See* Declaration of Jayson Scarborough attached as Exhibit 4, and Declaration of Shelly Hartmann attached as Exhibit 5.

rather than domestic blueberries, given that their commissions for import sales are considerably higher.[42]

In essence, the big marketers that own foreign blueberry operations, and those that rely heavily on imported blueberries, do not put a priority on the economic viability of American growers. To the contrary, their interests lie primarily with their import operations. Moreover, given the high volume of imports that these marketers sell into the U.S. market, they are less concerned with the price than with the volume, and will certainly make up any decrease in revenue on a single sale by the enormous commissions they make by selling a larger volume.

5. VICE CHAIR STAYIN: With different statutes' purposes, and purposes for safeguards in Title 7, should we think about the importance of price, and quality, and purchasing decisions differently in our safeguard causation analysis than we do in the AD and CVD underselling and injury analysis? (Tr. at 249)

Response:

The record in this case clearly indicates that import prices that are driven by enormous increases in supply, rather than subjective, anecdotal, and generic claims about "quality," are the cause of serious injury. Claims of quality differences are a means of gaining leverage in negotiations, and those opposing relief have not presented detailed, objective metrics for alleged quality distinctions.

And as explained below, even if both price and quality were factors for purchasers' choice of imported products, those are both characteristics of the imports. Import price and import quality cannot be alternative causes because both relate to the increasing quantities of imports. Neither are factors unrelated to imports. And the increased quantities of those imports are the substantial cause of serious injury to the domestic blueberry industry.

[42] In addition, there is no indication that the marketers provide "more" services associated with their sales of imported product than for their sales of domestic product. Tr. at 271 (Mr. Bjorn).

6. VICE CHAIR STAYIN: Safeguard statute. Does it require that price be the reason for a purchaser's switch from domestic products to imports for us to consider that to be an injurious change in sales and market share? If purchasers are switching to imports from U.S. product because of quality or varieties not available domestically, would that be a cause of injury to the domestic industry under the safeguard statute? (Tr. at 249)

Response:

The statute does not require that price or any other particular characteristic of the imported article be the reason for a potential purchaser's choice of an imported product. The statute only requires the cause of the serious injury to be the "increased quantities" of imports. Even if non-price factors *of the imports* were a reason for purchasers' choice of the imported article, the increased imports still can be the cause of the serious injury.

The Coalition cites legislative history for the simple proposition that other causes may be found to be more important causes of serious injury than imports.[43] But that legislative history make clear that the "conditions" identified, such as changes in technology or in consumer tastes, can be alternative causes *only if they are unrelated to imports.*

The cited Senate Finance Committee Report states in relevant part:

> With respect to threat of serious injury, the Commission should consider a decline in sales, a higher and growing inventory, and downward trend in production, profits, wages, or employment (or increasing underemployment) in the affected domestic industry. The existence of any of these factors such as the growth in inventory would not in itself be relevant to the threat of injury from *imports if it resulted from conditions unrelated to imports*. Such conditions could arise from a variety of other causes, such as changes in technology or in consumer tastes, domestic competition from substitute products, plant obsolescence, or poor management.[44]

[43] BCPH's Prehearing Brief, at 105. In fact, the passage cited relates to threat rather than serious injury.

[44] Trade Reform Act of 1974, Report of the Committee on Finance United States Senate Together with Additional Views on H.R. 10710, S. Rep. 93-1298, 93d Cong., 2d Sess., at 121 (Nov. 26, 1974).

The Report is simply clarifying that indicia of harm to the domestic industry that are due to *domestic* conditions should be distinguished and not attributed to imports. Accordingly, if a condition such as a change in technology or consumer taste related to competing domestic products was the reason for growing inventories, such conditions could be potential alternative causes. However, if the "conditions" are related to imports – for example, such as inherent characteristics of the imports that are the basis for consumer preference – then such conditions could *not* be potential alternative causes.

In sum, if the change in technology, consumer preferences, substitutes, or management are domestic in origin, then they should not be considered relevant to injury from imports. If, however, the enumerated conditions relate to the imports, then they cannot be an alternative cause.

In addition, there is no record evidence demonstrating consistent, objective differences in quality between domestic and imported berries, and no evidence that the variety of a blueberry is a consistent distinguishing factor in purchase decisions. There is no evidence in retail packaging, for example, that blueberry varieties are identified on labels, so variety cannot affect purchase decisions. In fact, many of the blueberry varieties grown in the importing countries are the same as those grown by the domestic industry.

Customers make their own subjective quality assessments. Buyers can be very idiosyncratic on what they deem "quality" blueberries, and the same load of product could be rejected by one or two buyers and be accepted by another. It is often the marketer that is influencing customers' perceptions of quality, and generally in accordance with economic

incentives that favor imports. In the experience of U.S. growers, claims of poor quality are often used as a pretext to make room for cheaper imports that marketers sell in massive volumes.[45]

Opponents of relief also contend that there is limited demand for blueberries whose shelf life has been preserved through "controlled atmosphere" methods, *i.e.*, the practice of keeping blueberries contained at a very low temperature before sale.[46] However, this claim is belied by the importers' own methods, which include transferring blueberries for weeks on a ship – in controlled atmosphere containers.[47] Accordingly, this method of prolonging shelf life cannot have an appreciable impact on purchasing decisions. To the extent that it does, this factor should favor domestic producers, as they rely far less on the use of controlled atmosphere to extend the life of fresh blueberries during transport.

Nor do old varieties explain the injury sustained by domestic growers. The list of varieties grown by state provided by respondents is simply wrong. In fact, U.S. growers have planted numerous new varieties, expressly in an attempt to remain competitive.[48]

7. VICE CHAIR STAYIN: The staff report says that 15 of 30 responding purchasers reported buying imported fresh blueberries instead of U.S. product, but only three of these purchasers reported that import prices were lower than prices for U.S. product, and one reported price as a primary reason for the decision to purchase imports.

What would I classify the injury? Is it price? Is it logistical factors, such as availability, distribution needs, and reliability of supply, and factors that go to

[45] *See* Declaration of Jason Scarborough, attached hereto as Exhibit 4; Declaration of Shelley Hartmann, attached hereto as Exhibit 5.

[46] *See* Tr. at 330-33 (Mr. Bjorn; Mr. Dougan).

[47] *See* Tr. at 392 (Mr. Silva) (describing that Chilean growers ship blueberries to Asia and Europe for 22 to 24 days due in part to "better techniques on shelf life for fruit."); "How Blueberries Are Transported Around the World," Hapag-Lloyd (Jan. 30, 2018), attached hereto as Exhibit 15 ("This is where Controlled Atmosphere Technology comes in. This technology is used to help these sensitive commodities travel longer distances, like those between Chile and Europe.").

[48] *See* Declaration of Shelley Hartmann, attached hereto as Exhibit 5.

competition between imports and the domestic product, such as quality, taste, genetics, and varieties? (Tr. at 250)

Response:

Rather than the self-interested assertions of purchasers regarding their reasons for buying increasingly large volumes of imported fruit, the Commission should rely on a fact-based, objective assessment of serious injury and the threat thereof by reason of surging imports of blueberries is inconsistent with these. The statute identifies several factors to consider with respect to injury, and further notes that the Commission "shall take into account all economic factors which it considers relevant."[49] Here, some of the primary indicia of serious injury suffered by the domestic industry include the following:

- declining net income;
- declining operating income;
- declining domestic market share;
- declining return on assets; and
- declining capital expenditures.[50]

The price of blueberries is central to the serious injury identified in this investigation because prices have dropped due to increasing imports. As supply has increased and outstripped the increasing demand, prices for blueberries have fallen for imports over the POI, suppressing U.S. growers' prices as well.[51] This has prevented U.S. growers from obtaining a reasonable profit, and this in turn has led to many of the problems described above.

II. Questions Regarding Like Product

A. Fresh and Frozen Blueberries

[49] 19 U.S.C. § 2252(c)(1).

[50] Staff Report at III-20, Table III-16; III-34, Table III-24; and Table C-1.

[51] *See id.* at III-11, Table III-8 and Table C-1.

8. COMMISSIONER SCHMIDTLEIN: I'm trying to get a good understanding of how the industry operates so for cultivated blueberries, right, not wild blueberries in terms of fresh and frozen do these blueberries, the blueberries that are going into fresh, the blueberries that are going into frozen are these coming from the same farms and being harvested at the same facilities and by the same workers in the U.S.? You don't have farms that produce just for frozen or farms that produce just for fresh? (Tr. at 14)

COMMISSIONER SCHMIDTLEIN: But do people focus or concentrate in one market? I mean, you're calling them process growers or fresh growers. It sounds like they are focusing and then maybe they play a little bit in the other side depending on what the price is. (Tr. at 148)

COMMISSIONER SCHMIDTLEIN: I thought if you're growing for processing, you can harvest by mechanical means, but growing for fresh is much more difficult to do that so when you shift a business plan how does that work, exactly. You had to go out and hire a bunch of people to hand pick those berries if you were doing process berries before and it's not, I guess it's the same type of variety you can use for both frozen and fresh? (Tr. at 149-50)

COMMISSIONER SCHMIDTLEIN: How do we deal with the fact that most responding U.S. producers and purchasers reported that fresh and frozen blueberries are only sometimes, or never, comparable with respect to most of the factors that we consider when evaluating like or directly competitive articles? So if we were to find a single domestic like article, what would we say about those responses? (Tr. at 252-53)

Response:

As a first step, the Commission should use the appropriate framework for identifying the domestic like product, or the domestic product that is directly competitive with the imported article. In making this assessment, the Commission looks at a variety of factors rather than a fixed list of requirements.[52] For example, the Commission has considered a product's physical properties, customs treatment, where it is made, how it is made, its uses, and the relevant marketing channels. Ultimately, the Commission "looks for clear dividing lines between products, disregarding minor variations."[53]

[52] *Crystalline Silicon Photovoltaic Whether or Not Partially or Fully Assembled into Other Products*, Inv. No. 201-TA-075, USITC Pub. 4739 (Nov. 2017) ("CSPV"), at 11.

[53] *Id.* at 11.

The Commission should approach firms' perceptions of fresh and frozen blueberries with this framework in mind and should look for clear dividing lines. If two products are seen as "fully," "mostly," or "somewhat" similar, there is no clear dividing line between them. Thus, these perceptions should all be viewed in favor of finding a common product. The corollary, of course, is that a perception that products that are "never" overlapping in the relevant factors are more indicative of a clear dividing line between products that are not like each other.

In this investigation, the roughly half or more of U.S. purchasers and producers agree that fresh and frozen blueberries are fully, mostly, or somewhat similar with respect to physical properties, manufacturing processes, and uses, as shown in the table below:

Table 2- Summary of U.S. Purchasers' and Producers' Responses Regarding Fresh and Frozen Blueberries[54]

Factor	Fully, Mostly, or Somewhat	Percent of Total	Never	Percent of Total
Physical Properties	92	70.2%	39	29.8%
Manufacturing Processes	55	48.7%	58	51.3%
Uses	94	75.8%	30	4.2%
Marketing Channels	36	33.6%	71	66.4%

Overall, these data show that there is not a clear dividing line between fresh and frozen blueberries. Even data that appear to highlight differences between fresh and frozen products are nuanced at a more granular level. For example, with respect to manufacturing processes, the majority of the producers those actually manufacturing the products view frozen and fresh blueberries as having fully, mostly, or somewhat the same manufacturing processes.[55] With regard to marketing channels, U.S. purchasers who are closer to the end of the marketing chain

[54] Staff Report at I 17, Table I 5.

[55] Staff Report at I 17, Table I 5 ((7 + 2 + 34) / (7 + 2 + 34 + 41) 0.512 51.2 percent).

than U.S. producers – are more likely than U.S. producers to view marketing channels for fresh and frozen blueberries as fully, mostly, or somewhat similar.[56]

Moreover, when these perceptions of U.S. producers and purchasers are viewed in the context of additional relevant factors – the strong price and supply relationship, the fact that growers may not know if a berry will be sold as fresh or frozen until after harvest, and the genetic uniformity of fresh and frozen blueberries – it confirms that fresh and frozen berries constitute a single like product that competes with the imported article. At a minimum, fresh and frozen blueberries are directly competitive with each other.

This conclusion is consistent with the Commission's decisions in other Section 201 investigations. In *CSPVs*, the Commission found a single domestic industry that produced "a wide variety" of solar cells, whether or not assembled into other products (*e.g.*, modules made of solar cells in aluminum frames).[57] In finding that there were "no clear lines differentiating" solar cells, the Commission pointed to similar channels of distribution, similar uses, and similar manufacturing facilities and processes.[58] In finding that modules were directly competitive with solar cells, the Commission highlighted that "both cells and modules share the same primary physical properties" and have the same function and that cells are dedicated for use in the production of modules and represent a substantial portion of the total cost of finished modules.[59] The Commission also acknowledged that "{t}he processes used to manufacture CSPV modules from CSPV cells are technologically sophisticated, more labor intensive than manufacturing

[56] *Id.* at I-17, Table I-5.

[57] *CSPVs* at 13.

[58] *Id.*

[59] *Id.* at 14-15.

CSPV cells."[60] In this investigation, the fresh and frozen blueberries come in many varieties but are genetically identical, have similar channels of distribution, and retain the same function and end uses (*i.e.*, human consumption). Fresh blueberries are necessarily dedicated to the production of frozen blueberries and represent a substantial portion of their cost. The products share a production process, although frozen blueberries – like CSPV modules – undergo an additional processing step using the same basic element as fresh blueberries. Accordingly, the Commission should find a single domestic industry producing a single like product – fresh and frozen blueberries. At an absolute minimum, the Commission should find that domestic fresh blueberries are like imported fresh blueberries, domestic frozen blueberries are like imported frozen blueberries, and that frozen blueberries are "directly competitive with" fresh blueberries, whether imported or domestic.

Opponents' arguments to the contrary are unavailing. They improperly compare this case, which involves a very integrated fresh and frozen industry for blueberries, to the facts in *Mushrooms* and *Asparagus*, which distinguished between fresh vegetables and canned products preserved in various liquids.[61] The differences in physical and chemical properties between canned goods and fresh or frozen goods are profound because of the addition of a brine solution and the pressure-cooking for canning, as well as, in some instances, the addition of wine or vinegar for preservation purposes.[62] The canning process also includes significant packaging

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[60] *Id.* at 15.

[61] BCPH's Prehearing Brief at 30-31, 38.

[62] "Canned mushrooms are usually packed in a light brine solution; however, small quantities are also preserved in vinegar (pickled mushrooms), in wine (mushrooms in wine), and in oil (marinated mushrooms). . . . Before they are canned, mushrooms are trimmed (roots removed), washed, graded, sometimes sliced, and then blanched. They are then put into containers, covered with a preserving medium, sealed airtight, and pressure cooked." ITC Pub. 1089, at A-5.

costs in terms of tinplate steel or other metal for cans, whereas fresh and frozen blueberries both generally are packed in less expensive plastic materials.

Opponents' references to the frozen products in *Mushrooms* and *Asparagus* are also not instructive here because the frozen goods made up a small portion of overall production in those cases. In *Mushrooms*, only 5 percent of the domestically produced, prepared or preserved mushrooms were frozen – almost all of it was canned.[63] In *Asparagus*, only 16.7 percent of total production went to frozen products.[64] In contrast, frozen blueberries made up between 48 and 54 percent of total U.S. blueberry production over the POI.[65] In short, these cases have very little similarity to the instant investigation, where there is no clear division between the production and marketing of fresh and frozen blueberries.

9. CHAIR KEARNS: If you all can help us post-hearing put some numbers on these things. I mean, I just don't know if, for example, it's a tiny percentage of fresh that ends up getting – that we thought was going to be sold fresh but ends up getting put into frozen, you know, versus that's most of what's going on here. So if you can help us, you know, maybe state by state and determines -- depends on variety.

Some varieties can withstand machine processing and others can't. But if you can help us kind of put more numbers on this and just have more facts, that would really help us, I think, if you could. (Tr. at 167)

Response:

There is a close supply and price relationship between fresh and frozen blueberries. Many farms sell both fresh and frozen product, and prices for fresh and frozen impact each other. Growers may produce both types of blueberries either intentionally or due to market conditions

[63] ITC Pub. 1089, at A-5.

[64] "In the 1970-74 period, about two-thirds of the U.S. asparagus crop has been processed by canning or freezing; the remainder has been sold through fresh-market outlets. Of the amount processed, approximately three fourths has been canned, and the rest has been frozen." ITC Pub. 755, at A-4.

[65] *See* Staff Report at III-5, Table III-3 (2017 production: 275,930 / (275,930 + 304,460) = 0.475 = 48 percent; 2016 production: 375,450 / (375,450 + 314,980) = 0.544 = 54 percent).

that arise during the season. Others prefer to sell fresh blueberries, but are unable to do so because they have been supplanted by imports. With respect to such producers, the Staff Report observed that

> {m}any of these growers reported that their goal is to sell all of their blueberries on the fresh market, where they can achieve a higher sales value. However, they sometimes sell blueberries for processing (primarily freezing) depending on many factors including harvesting costs, supply and demand, weather, labor availability, and blueberry quality.[66]

Due to these dynamics, a grower does not necessarily know if a blueberry growing on a bush in the field will end up as fresh or frozen. In fact, because bushes are harvested several times a year, the same bush could produce blueberries that are sold as both fresh and frozen.

A review of the questionnaire responses for U.S. blueberry producers shows that [ ] of [ ] producers reporting financial data received revenue for both fresh and frozen production.[67] These data also include wild blueberry production in Maine, which is dedicated almost entirely to production for the frozen market. The questionnaire responses reflect additional regional trends regarding fresh and frozen blueberry production. For example, Michigan and Washington growers plan at the outset of a season to dedicate a good portion of their crop for sale as frozen product. The questionnaire responses show that between [ ] and [ ] percent of growers in these states produce both fresh and frozen blueberries.[68] In California and Georgia, producers are very focused on producing for the fresh market, but understand that eventually some of their crop will be frozen for storage and sale.[69] During the hearing, Mr. Scarborough noted that California growers tend to sell 15 to 20 percent of their crop as frozen product, an estimate that

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[66] Staff Report at III-28.

[67] *See* Firms with Net Sales of Fresh and Frozen Blueberries, attached hereto as Exhibit 2.

[68] *Id.*

[69] *See* Tr.at 148 – 150 (Mr. Crosby; Mr. Scarborough).

[ ] response data showing that, for reported sales volumes from California, [ ] percent went into the frozen market.[70] Florida blueberries are also grown for the fresh market, but Florida does not have much capacity for freezing blueberries.[71] When marketers bypass Florida blueberries in favor of imported product from Mexico or other countries, a Florida grower may not have the option of freezing the crop, and in that case can either harvest the fruit at a loss or leave it on the bush without harvesting.

The variety of the bush is not necessarily indicative of the final form of the blueberry at the time of sale. Most varieties of blueberries can be sold fresh or frozen (with the exception being wild blueberries, which are particularly perishable when picked fresh). Although some varieties may hold up better during the freezing process, freezing is a method that can extend the shelf life of blueberries regardless of their variety.[72]

Blueberries can be hand-picked or harvested mechanically. The advantage of hand-picking is that the fruit is less likely to be lost in the field or downgraded during inspection. As a result, hand-picked fruit historically is more likely to end up in the fresh market than machine-harvested fruit. However, hand-picking is much more expensive than machine harvesting, and it may not be profitable to hand-pick blueberries if the price is low.

Blueberries can be harvested mechanically at a much lower cost. Like hand-picked blueberries, mechanically-harvested blueberries are sold as fresh or frozen product.[73] Machine-harvested blueberries are more likely to undergo bruising, although certain varieties have been

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[70] *See* Firms with Net Sales of Fresh and Frozen Blueberries, attached hereto as Exhibit 2 ([ ]).

[71] *See* Tr. at 149 (Ms. Lee).

[72] *See* Declaration of Shelley Hartmann, attached hereto as Exhibit 5.

[73] *See, e.g.*, Hearing Testimony of Brittany Lee (discussing efforts to increase the share or fresh production harvested by machine); Hearing Testimony of Ryan Atwood (explaining that his farms uses harvesting machinery for fresh production).

developed with the intent that they hold up better under mechanical harvesting.[74] Bruised fruit is sorted during the inspection process and is more likely to be frozen. In addition, mechanical harvesting is hard on blueberry bushes and can reduce their useful life.[75]

B. Correlation Between Fresh and Frozen Prices

10. CHAIR KEARNS: Another question I was going to ask about was pricing. We actually see real correlations between the fresh and the frozen prices that might suggest, you know, that there's a -- that whenever there's a big drop in fresh, then -- or, you know, that might make people move to frozen and so forth. (Tr. at 167)

CHAIR KEARNS: For post-hearing, I want to know more about whether prices for fresh blueberries impact prices for frozen or vice versa. And just more generally, I'm reminded of a case we had maybe over a year ago, Line Pipe and Structural Pipe, and I had a concern that if you find two separate like products there, then you put an order in place on the higher-end product, Line Pipe, then what will end up happening is countries will just export Line Pipe and downgrade it to structural pipe and sell it into that market. I wonder if that's a consideration we should have here. If, for example, relief were put in place for fresh, what would that end up doing to the market for frozen? (Tr. at 245-46)

Response:

The prices of fresh and frozen blueberries are strongly related to each other, consistent with the fact that the two products compete directly with each other. At the hearing, counsel for Canadian respondents asserted that there is no correlation between fresh and frozen prices,[76] but

[74] *See* Hearing Testimony of Brittany Lee (discussing efforts to develop machine-resistant varieties and the associated risk).

[75] *See id.*

[76] Tr. at 351 (Mr. Porter): "We've actually plotted both the fresh prices and the frozen prices in trying to look at where there's a correlation, and we're happy to put this in our post-hearing submission. And, quite honestly, it looks like a Jackson Pollock painting. There is no correlation at all, and you can understand that when you understand the very, very different dynamics that go into pricing fresh versus frozen."

this is plainly contradicted by the Commission's data. As a perishable seasonal product, fresh blueberries necessarily demonstrate greater seasonal variation in prices than frozen blueberries that can be stored in inventory. However, even with the significant swings in fresh blueberry prices, the record demonstrates a strong correlation between fresh cultivated blueberries and frozen cultivated blueberries. In fact, this correlation is much stronger than the correlation between *frozen cultivated* blueberries and *frozen wild* blueberries. Most importantly, frozen blueberries demonstrate the same fundamental pattern as fresh blueberries: prices declined over the POI as import volume and market share increased.

Exhibit 19 provides a correlation analysis of fresh and frozen prices at the quarter level, based on the conventional pricing products.[77] Fresh cultivated prices are strongly correlated with frozen cultivated prices. The prices of Product 1 (Fresh Cultivated in 6-oz cups) and Product 6 (Frozen Cultivated) demonstrate a coefficient of correlation of 0.702, which is statistically significant over the 19 available quarterly observations. The correlation between Product 2 (Fresh Cultivated in 1-pt cups) and Product 6 is also statistically significant, although it offers a smaller sample size.[78]

Of particular note is the fact the fresh/frozen price relationships within cultivated blueberries are stronger than the price relationships between frozen cultivated and frozen wild blueberries. In fact, the prices of frozen cultivated and frozen wild do not demonstrate any

[77] Staff Report Tables V-16-17, 21, and 23. Fresh prices reflect the quarterly simple average of monthly prices (volumes are not available for fresh pricing products); frozen prices are the quantity weighted average. *See* **Exhibit 19**.

[78] Exhibit 22. The exhibit also tests the correlations at the monthly level, where fresh cultivated prices are based on the Shipping Point price data (weighted by Movement volume) and quarterly frozen prices are interpolated between the middle month of each quarter. This also finds a statistically significant correlation, demonstrating that the results above are not the result of any distortion caused by the simple-averaging of monthly prices to quarters.

statistically significant correlation. The Commission should consider this finding in the context of Respondents' argument that fresh and frozen blueberries constitute separate like products: frozen blueberry prices are not even correlated within different types of frozen blueberries, but frozen cultivated blueberries are correlated with fresh cultivated blueberries. In terms of the conditions of competition, this finding also highlights the importance of supply-side factors in determining prices, most notably the seasonality in prices due to the perishability of cultivated blueberries. When a flood of imports forces cultivated growers to divert their blueberries to freezers, this affects the supply/demand balance of frozen blueberries. Likewise, the increasing volume and market share of frozen imports at declining prices means that those growers earn a lower return on those diverted blueberries.

Most important in terms of assessing the injurious effects of imports, frozen blueberry prices have declined over the POI as import volume and market share increased over the POI. This is the same pattern observed for fresh blueberries. Table 3 compares quarterly frozen Average Unit Values ("AUVs") over the full years of the POI. AUVs [ ] in each quarter, including [ ]-percentage point [ ] during the U.S. peak season from 2015 to 2019.

Table 3: U.S. Frozen Blueberry AUV Trends, by Year and Quarter, $/pound[79]

[ ]

Finally, the strong correlation between fresh and frozen prices – and the fact that fresh and frozen cultivated prices are more tightly linked than wild and cultivated frozen prices –

[79] Staff Report Tables V-20-23. *See* Exhibit 22.

illustrates the problem with the analysis of Dr. Ludema, submitted in the Canadian respondents' prehearing brief.[80] Dr. Ludema's application of the COMPAS model decomposes the U.S. blueberry market into fresh and frozen sectors.[81] First, this decomposition cuts across cultivated and wild blueberries and then treats fresh and frozen blueberries as completely separate channels with no interlinkages between them. There is no accounting for the supply/demand effects within fresh blueberries that drive prices and quantities in the frozen sector, or vice versa. This is especially problematic with respect to Canada because, as discussed in other answers to Commissioner questions, a significant share of Canadian imports are fresh *wild* blueberries destined to be frozen in Maine. Thus, these blueberries are consumed in the U.S. market as frozen products, but are treated as fresh in the market share tables on which Dr. Ludema bases his model. Given the fact that Canada is active in the U.S. market across types and forms, the model fails to accurately differentiate even Canadian volumes, much less the impact of those volumes in the U.S. market.

The Alliance agrees that granting relief with respect to only fresh or only frozen product would create perverse incentives. Indeed, import relief geared solely to fresh blueberries would drive imports into the frozen market, saturating that market even more and preventing U.S. growers from recovering costs through sales of frozen product. Similarly, import relief granted solely for frozen product would create a glut of fresh berries and have the effect of limiting U.S. growers to a protected frozen market that, even with somewhat higher prices, would still be much less profitable than sales in the fresh market. Accordingly, the Commission will best

[80] Canadian Respondents' Pre-Hearing Brief, Exhibit 6.

[81] Canadian Respondents' Pre-Hearing Brief, Exhibit 6, at 6-9.

effectuate relief in this case by finding a single like (or directly competitive) product consisting of fresh, chilled, and frozen blueberries.

11. COMMISSIONER SCHMIDTLEIN: You know, are you losing in fresh and frozen? If you lose it in fresh, does that mean it goes to frozen? And if it is going to frozen, should you also add where do we see that build up? When I look at inventory levels, I don't see a big build up in inventory levels. So there's some increase, but if you could unpack that. (Tr. at 254)

Response:

The domestic industry has lost market share to imports for both fresh and frozen. For fresh blueberries, domestic growers' market share declined from 49.0 percent in 2015 to 40.1 percent in 2019, an 8.9-percentage point decline.[82] For frozen, domestic producers' market share declined from 66.8 percent in 2015 to 60.9 percent, a 5.9-percentage point decline.[83] As is the case for fresh blueberries, the decline in domestic market share of frozen corresponded to significant declines in frozen prices over the POI despite significant growth in the market.[84] The Commission's pricing product data demonstrate [

].[85] As shown in **Exhibit 20**, these price declines are demonstrated at the quarterly level [

].[86]

Regarding the inventory build-up referenced by Commissioner Schmidtlein, this reflects that inventories of *cultivated* frozen blueberries have grown while inventories of *wild* frozen

[82] Staff Report at Table IV-3.

[83] *Id.* at IV-5.

[84] Apparent domestic consumption of frozen blueberries increased by 9.2 percent from 2015 to 2019. Staff Report Table IV-5.

[85] Staff Report at Tables V-20-23.

[86] **Exhibit 20**. *See* Sheet "U.S. Producer Prices for Frozen Blueberries."

blueberries have declined. This mirrors production trends. Table III-3 demonstrates that production of cultivated frozen (processed) blueberries increased by 48.9 million pounds, or 19.5 percent, while production of wild frozen blueberries decreased by 47.7 million pounds.[87] Thus, overall U.S. inventory levels mask an increase in cultivated frozen blueberries. Indeed, for cultivated blueberries in particular, cold storage inventories in the United States grew from 190 million pounds in 2015 to 231 million pounds by 2019 – a 21.6 percent increase.[88] It is the cultivated producers who face the trade-off of diverting to freezers – virtually all wild growers sell to frozen due to the nature of blueberries grown in Maine.[89]

USDA statistics compiled by the North American Blueberry Council show that the amount of frozen blueberries in U.S. cold storage has been higher every year of the POI than they were in any year before the POI and that increased inventories are trending, with cold storage holdings in 2019 exceeding such holdings from both 2017 and 2018.[90]

The record is clear that the volume and market share of frozen blueberries increased while prices declined. This pattern, consistent with the pattern observed for fresh blueberries, demonstrates the price-depressing effects of the dramatic increase in supply of imported blueberries in the U.S. market.

[87] Staff Report at Table III-3.

[88] *See* Staff Report at III-15, Table III-13 ((231 – 190) / 190 = 0.216 = 21.6 percent).

[89] Staff Report at Table III-3.

[90] *See* ABGA' Prehearing Brief, Exhibit 3 at 41.

III. Questions Regarding Serious Injury

12. COMMISSIONER JOHANSON: I was wondering, in what regions are U.S. farms that are losing money predominantly located, and what factors in those regions cause those losses? (Tr. at 135)

Response:

Losses from blueberry operations appear to be fairly widespread across the growing regions; however, producers in Georgia and Florida have been hit particularly hard. Although it has been suggested by opponents that poor performance in those regions was associated with weather events, growers testified that they purchase crop insurance to cover weather-related losses.[91] They also testified that weather events typically do not affect the entire region.[92] In addition, growers in Michigan have faced very steep price declines.[93] They are facing import surges through the entire season from Canada and then Peru and have seen [ ].[94]

13. CHAIR KEARNS: In a Title VII case, even if by some absolute measures the domestic industry is doing well, maybe it has high operating margins, we ask if the domestic industry would have been significantly better off were it not for subject imports. Do we do that same thing here in a 201 case? In other words, if we can say the industry is producing more than it was a few years ago, employment's higher than it was a few years ago, but if it weren't for these subject imports, it would be doing way better than it is now. Do we do that analysis, or is it very different? Is it instead where we say, is the industry hurting right now, and if it is hurting, is it because of subject imports? Given that we're not talking about unfairly traded imports, I can see why it would be different in that way. You wouldn't just say, well, yeah, the industry is doing great, but it would be doing even better if it weren't for

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[91] *See* Tr at 239-240 (Mr. Crosby, Georgia).

[92] *See* Tr. at 171-2 (Mr. Crosby, Georgia); 173 (Ms. Lee, Florida)

[93] *See, e.g.*, ABGA's Prehearing Brief at 40 – 41 and Exhibit 19 (showing a [ ] percent drop in prices for fresh blueberries and a [ ] percent price drop for frozen blueberries).

[94] *See* ABGA's Prehearing Brief at 58 – 59 (discussing the [ ]).

subject imports. It seems like that might be a little bit inconsistent with sort of the thinking with unfair imports versus just a surge in imports. (Tr. at 160, 162)

***Response*:**

Congress structured the statute governing Section 201 safeguards to provide the Commission with substantial flexibility and discretion in carrying out its analysis. The statute exists to ensure that the domestic industry is able to obtain relief for a period of time to adjust to imports entering the United States "in such increased quantities as to be a substantial cause of serious injury, or the threat thereof."[95] Thus, in the Section 201 context, the Commission looks at *increased* imports as the cause of serious injury. Under Title VII, the Commission looks at *unfairly traded* imports as the cause of material injury.[96] In both situations, the statutes focus on imports as the catalyst for injury. For the Commission's analysis on causation under Section 201, the statute provides broad discretion, explaining that the Commission "shall take into account *all* economic factors which it considers relevant."[97] This language provides space for the Commission to consider whether, similar to the Title VII situation, the domestic industry would have been better off but for the presence of increased imports. Thus, for Section 201, the Commission can – and should – consider whether the industry would have been better off in the absence of imports within the framework of Section 201.

This approach to assessing causation is bound up with the question of serious injury, as it requires understanding the nature of the injury in order to analyze the counterfactual situation of the absence of increased import`s. As with causal factors, the safeguard statute does not restrict the Commission to considering a limited set of factors related to serious injury and does not expressly exclude any factors.

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[95] 19 U.S.C. § 2252(c)(1).

[96] 19 U.S.C. §§ 1673d(b)(1) and 1671d(b)(1).

[97] 19 U.S.C. § 2252(c)(1).

In assessing whether serious injury has occurred, the statute directs the Commission to consider "all economic factors which it considers relevant, including (but not limited to)" idling of productive facilities, an inability to obtain a reasonable profit, and significant unemployment or underemployment.[98] Thus, the Commission is not limited to the three factors listed in the statute, but is required to consider all economic factors that it deems relevant. This is a wide scope for action, which the Commission has previously exercised in considering a multitude of economic factors in previous Section 201 cases.[99] There are several additional, relevant factors that the Commission should consider here, such as a declining operating income, declining net income, decreased profitability in the shoulder seasons, decreased value of payments for owner/family labor, increased frequency of farms operating at losses, domestic producers' loss of market share to imports, declining returns on assets, and declining capital expenditures. All of these show that the domestic industry has suffered serious injury, and at the same time, would be performing better by these metrics in the absence of increased imports.

Opponents view the Commission's injury and causation analysis as much more limited and contend that the Commission cannot find injury where, as here, the Staff Report shows that the domestic industry is still eking out a profit following a steep decline in profitability during the POI. In the Title VII context, the statute provides that the Commission "may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved."[100] Opponents argue that such language is not contained in the statute

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[98] 19 U.S.C. § 2252(c)(1)(A) (emphasis added).

[99] *See, e.g.*, *LRWs* at 36 – 37 (citing reduced capital investment and research and development as factors showing serious injury); *CSPVs* at 43 (citing postponed and cancelled projects, inability to secure capital, and declining market share as factors showing serious injury)

[100] 19 U.S.C. § 1677(7)(J).

governing this investigation, and thus the Commission should find no injury because the domestic blueberry industry's operating or net income has not fallen below zero.[101] This interpretation of the statutes governing both Section 201 and Title VII investigations is flatly wrong.

Title VII was amended to include the language on profitability in 2015.[102] However, one of the co-sponsors of the amendment, Senator Portman, was unambiguous in stating that the "new provisions makes clear what was, in my view, already present in the law: that domestic producers do not have to wait until they are losing money and jobs and market share to seek, and obtain, trade relief."[103] In other words, Senator Portman explained that this amendment was essentially surplusage because it represented an existing authority of the Commission, but that the Senate felt it was necessary to emphasize the Commission's existing ability to find injury even if an industry was profitable. At the time of these amendments in 2015, Section 201 authority had not been used by the U.S. government for nearly 15 years, and Congress was focused on ensuring that the Commission better understood its intent with respect to the active docket of Title VII cases.[104] Although Senator Portman did not directly speak to injury in the Section 201 context, his interpretation of the concept of "injury" in the Commission's determinations is equally applicable in this investigation. Indeed, the statute governing Section 201 identifies one factor for consideration as whether firms in the domestic industry can carry out operations "at a reasonable level of profit." This very language contemplates the idea that an

[101] *See* Tr.at 345 (Mr. Cameron).

[102] Trade Preferences Extension Act, P.L. 114-27, § 503 (129 Stat. 362, 365).

[103] "Portman Urges International Trade Commission to Protect Ohio Steelworkers," (May 24, 2016) (emphasis added), attached hereto as **Exhibit 21**.

[104] In this context, the mere fact that Title VII was amended and Section 201 was not does not lead to a logical inference that the Commission is not permitted to find profitable industries to be seriously injured.

injured industry can be profitable at a level that is not reasonable. Thus, the statute itself and the intent of Congress expressed by Senator Portman demonstrate that injury in the context of seeking trade relief is not dependent on whether an industry is profitable. As a result, the Commission should accept the decline in operating and net income of U.S. growers as evidence of injury, despite residual profitability in 2019.

14. COMMISSIONER JOHANSON: Mr. Nicely this morning and also the importers' prehearing brief contends that U.S. producers' low response rate to questionnaires suggest that many growers are perhaps doing well or do not consider imports a major problem. Could you all please give your view on this? (Tr. at 178)

COMMISSIONER JOHANSON: But were there not regional or state organizations that could help out with this effort? (Tr. at 181)

***Response*:**

The vast majority of blueberry growers across the country are struggling to maintain their farms, consider that imports are the most significant factor causing their problems, and are supporting the 201 investigation.

First, the organizations representing the vast majority of blueberry growers in the United States support the investigation. Attached at **Exhibit 22** are the declarations confirming support from:

- The California Blueberry Commission;
- The Florida Blueberry Growers Association;
- The Georgia Blueberry Commodity Commission;
- The Georgia Blueberry Exchange;
- The Michigan Blueberry Advisory Committee;
- The Oregon Blueberry Commission; and

- The Washington Blueberry Commission.[105]

These organizations include both private non-profit trade associations and government commissions established under state laws and operated under government oversight.

Second, following the unexpected request from USTR to initiate this investigation, these groups acted as quickly as possible to organize an alliance of growers that was separate from other organizations and associations that are controlled by marketers and foreign interests. The above-referenced groups also provided funding and other support and have used their best efforts to encourage all of their member growers to respond to the Commission's questionnaire.[106]

Third, the Commission received responses from approximately 122 out of 1,150 firms to which it sent questionnaires, for a response rate of just over 10 percent. These 122 growers, however, we believe account for 32.3 percent of total bearing acreage.[107] Thus, the non-responding universe skews towards smaller growers. This is not surprising, given the length and complexity of the U.S. producers' questionnaire. Small farms simply do not have the office staff or the money to ask their outside accountants to respond to the lengthy request for information. As Mr. Crosby, a Georgia grower and former banker explained at the hearing, he cannot get small growers to fill out a one or two page balance sheet.[108]

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[105] Notably, if the domestic producers questionnaires of those growers that are affiliated with marketers of foreign blueberries and/or have substantial foreign interests are disregarded due to conflicting interests, virtually all of the remaining domestic producers support the investigation.

[106] Exhibit 22.

[107] *See* Staff Report at I-6.

[108] *See* Tr. at 181.

Fourth, despite their efforts, these grower organizations are aware that many of their growers have been unwilling to respond due to concerns about retaliation by their marketers. As one grower commented in trying to encourage growers to respond to the most recent requests from the Commission staff, "they are intimidated by the companies that {sic} buy and or sells their fruit."[109]

Moreover, certain marketers actually offered to complete questionnaires on behalf of their growers.[110] Apart from the obvious potential for highly biased responses, these offers were also intended to intimidate growers by highlighting that their marketer would be monitoring their responses. Many growers did not understand or believe that their responses would be confidential and, instead, decided not to respond.

Finally, when the draft questionnaires were issued, the industry commented that a 50-page questionnaire asking for detailed data on every aspect of their farming operations over a five-year period would be extremely difficult for many farmers to complete and that a simplified questionnaire for smaller farms could be helpful in facilitating a higher response rate.[111] Instead, those opposing the investigation requested an even longer and more complex questionnaire, knowing full well that lengthier questionnaires would suppress the response rate. Indeed, they suggested adding 23 additional questions to the U.S. Producers' Questionnaire and expanding the

[109] [ ], attached hereto as **Exhibit 23**.

[110] *See* E-mail from [ ] to Jerome Crosby, attached hereto as **Exhibit 24.**

[111] ABGA's Comments on Draft Questionnaire (Oct. 9, 2020).

scope of 15 questions.[112] Hearing testimony confirmed the challenges faced by farmers and the significant individual and collective efforts made to respond to the questionnaires.[113]

In sum, a substantial majority of the domestic blueberry industry supports this investigation and has done everything possible to cooperate with the Commission and respond to the questionnaires as best they can under the unique circumstances of this industry and this investigation.

15. VICE CHAIR STAYIN: How do you respond to arguments that the U.S. industry is not displaying any of the normal characteristics of an industry suffering from serious injury or facing the threat of serious injury? For example, Respondents argue that there are upward trends in U.S. shipments and employment indicators, among others. (Tr. at 205)

Response:

The Commission is not required to find negative shipment or employment factors in an affirmative Section 201 serious injury proceeding. Indeed, 19 U.S.C. § 2252(c) (1), states, that:

> In making determinations under subsection (b), the Commission shall take into account all economic factors *which it considers relevant*, including (but not limited to)— (emphasis added).

Thus, the statute explicitly grants the Commission discretion to consider the factors relevant to each proceeding.

In assessing the domestic industry health, the statute also directs that the Commission must "consider the condition of the domestic industry over the course of the relevant business

[112] BCPH's Comments on Draft Questionnaire (Oct. 9, 2020).

[113] Tr. at 181 (Mr. Crosby). *See also* E-mail from [ ] (highlighting the burden, particularly for those that rely on a second job), attached hereto as **Exhibit 25**.

cycle."[114] The business cycle for blueberries is particularly lengthy. Like all industries, decisions to increase investments and production are made when prices are high, profits are adequate, and markets are growing and/or projected to grow in the future. Such conditions prevailed five to ten years ago, when the positive health benefits of blueberries were gaining notice and when subject imports from most countries were at much lower volumes and largely present only during the U.S. producers' off-season.

The period between the decision to invest in expanded production and the achievement of steady state production, however, is unusually long for blueberries. New plantings must be ordered as much as two years in advance.[115] Once planted, the bushes produce no significant commercial quantities for two to four years and take around seven years to reach full production.[116]

Given those realities, the increases in shipment and employment indicators reflect investment decisions made 5 to 10 years prior to the last year of the POI, when market conditions were very different. Once the plants are in the ground and producing, the grower has to harvest them, or face even greater losses. Thus, increases in these performance metrics should not be taken as indicators of a healthy U.S. industry.

16. COMMISSIONER JOHANSON: The statute directs us to consider not only profits but also significant unemployment or underemployment. By that metric, isn't the labor component of the domestic industry doing fairly well? (Tr. at 213)

Maybe this is more of a legal question that can be best handled in the post-hearing brief, but once again, we're supposed to look at significant unemployment and underemployment, and, I mean, looking at the numbers we have right now, that is

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[114] *See* 19 U.S.C. § 2252(c)(2)(A).

[115] *See* Tr. at 377 (Mr. Bjorn, Driscoll's)

[116] *See* ABGA's Prehearing Brief at 27.

not the situation, so if you can maybe just identify maybe on paper explaining that and how the current situation should be addressed, I'd appreciate it.

***Response*:**

As testified at the hearing, the state of labor over each year of the POI reflects planting decisions that were made several years prior.[117] Once the bushes planted in the past begin bearing fruit, growers have a strong incentive to hire additional labor to pick blueberries from their newer bushes, so long as the fruit being picked covers the marginal cost of harvesting, transport, and other contemporaneous costs. If growers have more acres to harvest today because of decisions made four years ago, those acres will be picked even as returns are plummeting so long as the marginal revenue of doing so exceeds the marginal cost. For this reason, employment levels are not a reliable indicator of serious injury for the domestic blueberry industry. At best, the current employment level among growers is a lagging indicator demonstrating grower's prior belief that the expanding domestic market for blueberries would enable them to make an adequate return on their investments and family labor. The Commission should thus give employment levels among growers reduced weight.

For freezing, employment levels are under pressure and indicative of serious injury. The number of production and related workers fluctuated during the POI but during 2019 were below 2015 levels by 8.6 percent.[118] This decline occurred despite a 9.2 percent increase in apparent consumption. During interim 2020, employment at freezing operations was 12.1 percent lower than in interim 2019.[119] This reduction far exceeded the 0.7 percent decline in apparent

[117] Tr. at 213-214 (Mr. Anderson, Mr. Crosby, and Ms. Lee).

[118] Staff Report at Table III-14.

[119] *Id.*

consumption over the interim period.[120] In addition, [

] during the POI despite this growth in demand, leading to employment reductions that are not included in the Commission's data.[121] Clearly, the stress of low prices caused by import-driven oversupply has led to unemployment and underemployment among freezing assets in the U.S. blueberry industry.

17. COMMISSIONER JOHANSON: Can an industry in an improving market be seriously injured if it's still profitable, expanding in many areas? Also, what is the closest 201 investigation which had this type of situation? (Tr. at 215-16)

***Response*:**

Yes, domestic industries in multiple prior cases have been found to have been seriously injured even when still profitable.

In *Lamb Meat*, for example, three of the four subgroups within the domestic industry examined were profitable, and the Commission found the industry to be seriously injured. The distinct subgroups in the domestic industry were growers, feeders, packers, and breakers (processors). The "aggregate data for the responding growers showed an overall profit during the entire period of the investigation" though "profits as a percentage of net sales fell" (and profits even increased somewhat in the last year of the POI). Packers and breakers showed "a significant decline in the value of net sales and in operating income." Only feeders had moved from profits to losses during the POI.[122] In addition, these three industry subgroups were profitable even as the per capita consumption of lamb meat was stabilizing during the POI from a

[120]Prehearing Report at Table IV-5.

[121] [

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[122] *Lamb Meat,* Inv. No. TA-201-68, USITC Pub. 3176 (Apr. 1999) at I-17.

decline previously. This is in stark contrast to the sharply declining profit trend experienced by the domestic blueberry industry despite booming blueberry demand.

In *Wood Shakes and Shingles*, the Commission examined a variety of factors and determined that the domestic industry was seriously injured even though net income for the industry was positive (though declining) in the final two years and the interim period examined.[123]

In *Nonrubber Footwear*, the Commission examined a variety of factors and determined that the domestic industry was seriously injured even though both operating income and net income for the industry were positive throughout the POI, although generally declining.[124] In addition, one Commissioner observed that an "industry may be profitable in an accounting sense while at the same time it may be shrinking or dying."[125]

In *Mushrooms*, the Commission examined a variety of factors and determined that the domestic industry was seriously injured even though aggregate net operating profit for growers and for canners was positive throughout the POI.[126]

18. COMMISSIONER KARPEL: How should we understand what's a reasonable level of profit in this industry? You know, is there some calculation producers have done that they need a certain percentage of operating income or net income to justify, you know, upgrading machinery or making new plantings? Or should we be looking at it, you know, relative to what profits are in agriculture generally or typically or in certain parts of agriculture? The Coalition has said, for example, that the operating or net income they're seeing in this investigation is higher than other parts of agriculture, so perhaps that indicates that it is a reasonable level of profit. So what would you say should be our metric for this industry? (Tr. at 233-34)

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[123] *Wood Shakes and Shingles*, Inv. No. TA-201-57, USITC Pub. 1826 (Mar. 1986) at 12, A-33-34.

[124] *Nonrubber Footwear,* Inv. No. TA-201-55, USITC Pub. 1717 (Jul. 1985), 18-19, A-52.

[125] *Id.* at 34.

[126] *Mushrooms*, Inv. No. TA-201-43, USITC Pub. 1089 (Aug. 1980), A-64-66.

Response:

BCPH's brief and testimony compare domestic industry performance to measures that are inconsistent with data collected by the Commission. This response explains what the Commission should look at when developing a metric for this industry, adjusts reported domestic performance for unpaid labor and management, and demonstrates why BCHP's crop budgets and the nation-wide data cannot serve as benchmarks.

What constitutes a reasonable level of profits?

A reasonable level of profit in any industry is one that (1) provides a fair return to the investor, after accounting for all costs; and (2) allows for the level of continued investment needed for ongoing operations. Although (1) may be measured against industry averages, (2) is unique to each industry and reflects the dynamic of technology and competition for that particular product.

Adjusting grower performance for unpaid labor and management

Any analysis of reasonable profit presupposes that all costs have been accounted for. "All" costs means all costs that are necessarily related to the production of the product. We note that opponents provided no credible rebuttal to the Alliance's argument, backed by a certified public accountant with experience in this industry, that profitability for blueberries should be measured at the net income level, including all "other expenses" and interest.[127] The record clearly demonstrates that the costs included in "other expenses" are massive and are those which the Commission normally considers to be operating in nature.[128]

[127] *See* Tr. at 112-14.

[128] *See* ABGA's Prehearing Brief at 44-49.

Even measuring profits at the level of net income as reported to the Commission, however, overstates the true economic return to the grower, as it fails to account for (a) owner/grower labor, and (b) pre-production expenses incurred in prior years.[129] The worksheet attached as **Exhibit 46** estimates the impact of these two factors. As is shown in the Exhibit, assigning a market value to unpaid owner/grower labor reduces net income by about two percent per year. Adjusting for the understatement of pre-production costs decreases net income by another nine percent. When these two adjustments are made, the net income over the full year POI is negative in every year, and declines precipitously over the POI to negative 9.7 percent in 2019. These levels are indicative of serious injury.

These paltry returns (a negative 6 percent on sales and assets, respectively, for the POI) are inadequate to fund new investment needed to sustain continuing operations.[130] In light of the substantial investments in mechanization and new varieties needed to make the U.S. industry competitive with the huge onslaught of future imports, much higher returns are needed.

The BCHP Benchmarks are Inappropriate

In his testimony, Mr. Dougan put fourth three slides purporting to demonstrate that the domestic industry is doing well:

- Operating ratio for the farm sector as a whole published by USDA;[131]
- Operating ratios based on crop budget estimates from Florida, North Carolina, and Washington;[132]

[129] *See* Tr. at 114 - 116 (Mr. Moore, CPA); ABGA's Prehearing Brief at 51-54.

[130] *See* Restated Financials, attached hereto as **Exhibit 46**

[131] BCPH's Hearing Presentation, Slide 3.

[132] *Id.* at Slide 4;

- Overall U.S. Farm Current Income as a percent of Farm Assets.[133]

None of these slides provide a reasonable benchmark for the Commission to use when assessing the performance of the domestic industry. The primary reason is that the benchmarks incorporate other cost measures that are not captured in the Commission's profit/loss statement. This information is plainly evident in the budget estimates and on the USDA website.

BCHP Slide 3 indicates that annual farm sector operating margins ranged from six percent to ten percent from 2015 to 2019, which BCHP asserts is lower than the domestic industry operating margins. However, the operating profit margin used by USDA does not match the operating margin concept used by the Commission. The Commission's operating margin is equal to net income plus net interest and other expenses. USDA's measure of operating profit, shown in the figure below, is equal to net income plus interest *minus returns to unpaid labor and management*, which are treated as expenses. The questionnaire in this investigation did not take into account unpaid labor and management and likely is missing a substantial level of pre-production expenses, which are substantial expenses, as discussed later. Thus, all other things being equal, the operating margin reported on the Commission's questionnaire would exceed USDA's measure because the latter takes into account additional expenses. Thus, farm sector operating margin is inappropriate for the Commission to use as a benchmark.

[133] *Id.* at Slide 8.

Table 4. USDA's definition of the operating profit margin for the farm sector[134]

Operating Profit Margin Ratio Formula

$$Operating\ profit\ margin\ ratio_t = \frac{Net\ farm\ income_t + Interest\ expense_t - Returns\ to\ unpaid\ labor\ and\ management_t}{Value\ of\ production_t}$$

On the other hand, a comparison of trends for the two measures is instructive. While U.S. farm sector operating margin was fairly stable during 2015 to 2019, the blueberry industry's operating margin declined substantially over this same period, regardless of how it is measured. The relative severity of the decline in the domestic industry's financial performance is indicative of its serious injury.

For similar reasons, the return on asset measure presented in Mr. Dougan's Slide 8 cannot serve as a benchmark. The return on asset measure used by USDA takes into account unpaid management and labor expenses. The Commission's measures of net and operating income do not.[135]

The various crop budgets cited by BCPH are also inapposite, for similar reasons. As an initial matter, crop budgets are generally meant as planning tools to provide profitability estimates under different assumptions of cost, price, and yield. This is useful for both existing and potential growers in the particular states. However, such budgets are not meant to provide a benchmark for industry-wide or even state-wide operating profitability in a given year (*i.e.*, growers in state Y should have earned 10 percent operating margin last year). Thus, BCPH's use

[134] USDA ERS - Documentation for the Farm Sector Financial Ratios, attached hereto as **Exhibit 26**.

[135] *Id.*

of these budgets for comparison purposes is misleading. Moreover, by their very definition, crop budgets capture all pre-production expenses.

In addition, the operating margins put forth by BCPH on its Slide 4 are not comparable with the operating income calculated from the Commission's questionnaire for various reasons. First, the budgets include costs that are not captured by the Commission's questionnaire. It is common for operating budgets and USDA estimates of actual profitability to include imputed costs for unpaid labor and management because farms typically have both. Indeed, all three crop budgets put forth by BCPH incorporate some or all of these expenses. For example, the Florida budget for 2016 contains specific expenses for the opportunity cost of operating labor and imputed management fees.[136] The North Carolina budget for 2005 imputes labor costs for each task (*i.e.*, it assumes all labor is paid) and therefore estimates costs for both paid and unpaid labor.[137] The budget for Washington also imputes labor costs for each task and includes a management fee as a cost.[138] The Commission's financial data capture only actual labor and management costs (if any are incurred) and therefore would overstate profitability achieved relative to all three crop reports that include one or more of these additional expenses.

Second, the crop budgets are also inappropriate for the POI because they are based on outdated and low prices. For example, the Florida budget's returns are based on prices that differ from prices actually received during the POI. For example, the minimum price used to calculate

[136] BCPH's Prehearing Brief Exhibit 68 at 2, and Tables 4-6 at 7-10 (PDF pp. 1816, 1821-14).

[137] *Id.* at Exhibit 9, Tables 8-10 (*see* footnotes 6-20) at 13-18 (PDF pp. 1279-84).

[138] *Id.* at Exhibit 67 at 3 (PDF p. 1811).

revenue is $3.70 per pound, well below the prices received by domestic and Florida producers.[139] The North Carolina budget is based on price and cost levels prevailing in 2004.[140]

Third, the measures used in the crop budgets are not even operating margins. For example, the Florida budget includes interest expenses, making reported returns more akin to net income than operating income.[141] The North Carolina margins characterized by BCPH's slide deck as "operating margins" are returns on invested capital.[142] The Washington study includes interest costs and, therefore, is more akin to the Commission's net income measure than to operating income.

IV. Questions Regarding Increased Imports

19. COMMISSION KARPEL: Your prehearing brief presents information on volume and market share of imports and shifts of market share from domestic product to imports on an annual basis. But given everything I've heard today from this panel about the importance of seasonality in this market, it doesn't seem to me that that is a very useful way to look at things in this investigation

I think the coalition makes that very point in their prehearing brief. So would I be correct in thinking that we really should be looking at import volumes and market share on a seasonal basis, a monthly basis, instead of the annual basis that maybe you would see in the C tables or that is discussed in your prehearing brief? (Tr. at 193)

Response:

Please see Economic Appendix at 5-8.

20. COMMISSIONER KARPEL: But, if it's truly a seasonal market, would it be appropriate to look at annual -- I mean, it might not tell you anything, right? Like, if all the imports, hypothetically, were coming in in the three months where the

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[139] *See id.* at Exhibit 68, Tables 10-12 at 11-12 (PDF pp. 1825-6); and Staff Report at Tables III-16, III-18, and III-20.

[140] BCPH's Prehearing Brief, Exhibit 9 at 2 (PDF p. 1268).

[141] *Id.* at Exhibit 68 at 2, and Tables 4-6 at 7-10 (PDF pp. 1816, 1821-24).

[142] *Id.* at Exhibit 9 at 6-8 (PDF pp. 1272-74).

domestic industry has virtually no shipments, that wouldn't be a case, it didn't seem -- wouldn't be a case where there would be sort of direct competition. (Tr. at 194)

Could you do that work for the post-hearing brief? It's not in your prehearing brief, so I think that would be really interesting to see and have broken out. It's not in our staff report either, so, you know, I need to see the data somehow. (Tr. at 195)

Response:

Please see Economic Appendix at 5-8.

V. Questions Regarding Causation

A. Whether injury was caused by imports

21. VICE CHAIR STAYIN*:* Please respond to the arguments regarding factors other than imports, including poor weather and intra-industry competition, during the U.S. peak season have entered the U.S. industry. How should we assess whether the other possible causes of injury are a more important cause of injury than increased imports? (Tr. at 171)

Response:

The record before the Commission plainly demonstrates that the alternative causes put forth by respondents do not come close to usurping the position of imports as the most important cause of serious injury to the domestic industry. As described at the hearing and in this submission, the driving force in the decline in the domestic industry's situation is the lower prices caused by increased imports during the U.S. harvest season. None of the alternative causes put forth by respondents explains the depth of the price declines or their timing. Indeed, some of the causes put forth by respondents would increase prices, not decrease them. The record is clear. Imports have been the substantial cause of the serious injury experienced by U.S. producers.

As an initial matter, the vast majority of responding growers, 96, characterized imports as the most important cause of their injury.[143] The second cause, labor shortages, was only selected as the most important cause by 26 firms. No other factor was identified as the top cause by more than 20 firms.[144]

[143] Staff Report at Table I-2.

[144] *Id.*

Second, factors such as poor weather and labor shortages would have limited supply by reducing yields and raising per unit costs. Both of these factors would tend to increase marginal cost, causing the supply curve to shift to the left. All other things being equal, the leftward shift would result in lower supplies and, therefore, increased prices and lower production.[145] This is exactly the opposite of what happened in 2019 when the market supply curve shifted to the right due primarily to the surge in imports, causing prices to decline. The economics alone are sufficient to disqualify weather events and labor shortages as causes of injury greater than imports.[146]

Third, expanding West Coast production was not the main cause of declining prices during the U.S. season, as described above in response to question 2. Just as telling, the economics of Respondents' West Coast hypothesis do not make sense either. Respondents claim that West Coast shipments were responsible for nationwide price declines over the POI. Yet in 2019, domestic producers lost market share during their harvest window.[147] Domestic competition could not have been the primary cause of injurious price declines when imports were gaining market share at the same time.

22. COMMISSIONER KARPEL: In one of the arguments I've understood for the alliance is that pricing pressure in the spring shoulder season has had an effect on prices for the rest of the season and I guess I'm trying to understand that in view of this slide in particular where we see the phase two which I understand is the spring shoulder showing a market share increase of only 3.5 percent over the POI but we see the bigger increase in market share for the fall shoulder, so, can you explain that argument in light of where we sort of, in light of the slide? (Tr. at 151-52)

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[145] *See* Tr at 136-7 (Anderson).

[146] It should be noted that weather events are endemic to farming and occurred in Canada as well, particularly in areas adjacent to Maine. *See* "Less wild blueberries for strong demand," Fresh Plaza (Aug. 28, 2020), attached hereto as **Exhibit 27**.

[147] Please see Economic Appendix at 7-8. For the Alliance's comments on the Staff's elasticity estimates, please see **Exhibit 45**.

Response:

Please see Economic Appendix at 8-11.

23. COMMISSIONER KARPEL: Okay, but what, I guess, I mean, to be honest, I mean, in looking at the Alliance's brief I kept wanting to see more data, like that would, I heard the witness testimony and the argumentation in your brief but what I really want to see is the data that I could look at to be like, oh, that's right, pricing pressure in the 1 spring shoulder is really affecting prices throughout the whole entire season. But, for example if I look at this data in slide 26, you know, I have a question mark, is that really true, so how would you put together a table like this or some other way that would substantiate what we're hearing anecdotally from the producers in this industry? (Tr. at 153-54)

Response:

Please see Economic Appendix at 8-11.

24. COMMISSIONER KARPEL: Right, but that shows if we accept all the data there that would show that there are declining prices in March and April and in the fall shoulder but what I'm trying to get at is this argument that the spring shoulder has an impact on prices through the whole season. (Tr. at 153)

Response:

Please see Economic Appendix at 8-11.

25. COMMISSIONER KARPEL: I'm just trying to parse out whether, you know, if 1 we were looking for, you know, injury here, we're focused on the argument that imports have increased in the shoulder periods and prices have declined in the shoulder periods. Those shoulder periods are really important for domestic producers. Therefore, you know, injury. Or is there another argument, which I thought was pretty prominent in your prehearing brief, but I'm not sure I'm getting what I'm looking for in terms of support for that. Is that there's sort of this effect from the shoulder season pricings on the entire market? And more so perhaps -- again, maybe I'm misunderstanding your brief -- that natural supply and demand is responsible for declining prices maybe in the peak session. (Tr. at 156)

Response:

Please see Economic Appendix at 8-11.

26. COMMISSIONER KARPEL*:* So I guess I'm just trying to find something to hang onto, that the lower prices in the peak season aren't simply a reflection of greater supply but are a reflection of the imports that came in in the shoulder season. (Tr. at 157)

Response:

Please see Economic Appendix at 8-11.

B. Causation: Injury Within Weeks, Within Months, and Within Seasons

27. COMMISSIONER KARPEL: Okay. Well, more that you can do to substantiate that particular point I've been asking about post-hearing, that would be helpful. And I think as well as I'm looking at Slide 29 and I guess the next, the one on the fall season, so is that -- the next slide -- yeah, 20 29 and 30, this sort of ties import volume with price declines. But I'd be curious what this would look like if it was import market share instead of import volumes because, of course, apparent consumption is increasing over the POI, and so import volumes are going up to meet increased consumption, domestic production. Shipments are going up to meet increased consumption, but maybe not by the same measure. So seeing what that would look like, and I thought that Slide 26 was interesting that you had those percentages not just for import volume but for market share as well. So my time is up, so I'll stop there. (Tr. at 157-58)

VICE CHAIR STAYIN: Respondents argue that price is not an important factor in purchasing decisions and that U.S. producers have not lost sales or revenue to imports. Respondents argue that changes of domestic producers' average unit values do not correlate to unit -- to import volumes. What data would you point to in support of your argument that increased imports had an effect on U.S. prices? (Tr. at 168)

VICE CHAIR STAYIN: The Respondents argue that changes of domestic producers' average unit values for fresh berries do not correlate to import volumes. (Tr. at 168)

CHAIR KEARNS: Mr. Szamosszegi, you pointed us to a graph on page 15 of your slides, but, to me, it seems like the slide I really would want to zero in on is on page 24, right?

And I take Mr. Greer's point, it's important to remember that frozen is sort of a very different animal, but on page 24, it seems like we want to really just kind of dissect this a little bit.

I'm comparing it, by the way, to a similar sort of slide or chart 10 that the Respondents put together that's on page 25 of their brief. And I'll just start with their slide.

In essence, it compares the year 2000 to the year 2019, and, what it shows is relatively small volumes of U.S. products in the summer of 2000 compared to the summer of 2019 but that almost all of the imports are coming in in other periods, January through March and September through December, and your chart is somewhat similar but tells a pretty different story.

What should we look at? Because it seems to me like what your chart shows us on page 24 of your slides is, yes, there's some truth to what Respondents are saying. There's a big increase in imports early in the year and late in the year, and those aren't competing against U.S. products, so we 1 should ignore those, and so any kind of increase in imports we may see on an annual basis, those should be discounted.

But, if you look at the two shoulders there, I think what you all are saying is you do see a growth in imports in both shoulders and that that is what you can attribute the fall in prices during those periods, right? Isn't this what our analysis should really be focused on? (Tr. at 196-98)

CHAIR KEARNS: What I'm seeing here is at the beginning of the Spring shoulder, I'm seeing what I would describe as a relatively small decline in the U.S. price from 2015 to 2019, certainly small compared to what I'm seeing in the Fall shoulder, where there's a pretty dramatic drop for the U.S. price, and I guess you would say two things.

Tell me if I'm wrong, but I'm guessing what you would say is that might look like a small increase with a little bit over 20 in 2015 in the spring shoulder and a little bit under 2015, but, again, this goes to your whole point. Like, that's a lot higher than the prices you're getting of, like, five in the middle of the season. So that's what you're saying about how -- that's where all your profits are being made.

But then I guess the other point is, in the Fall shoulder, you're seeing a pretty dramatic drop in prices. Is that what I'm looking at there? Does that make sense? (Tr. at 200-01)

COMMISSIONER SCHMIDTLEIN: One question I wanted to ask first was about Slide 24. I noticed that the scale is different between the two years. So, if you look at 2015 on the right side, you know, the last is -- for the price per pound, seems to be slightly different. You see how the $7 per pound is where it is. And then, over on 2019, seven is at the top of the line there. So the pricing scale is not the same on both sides. Why isn't it the same? (Tr. at 221)

COMMISSIONER KARPEL: Back to Slide 24. In addition to what Commissioner Schmidtlein asked, if you could sync up the scales in 2015 and the 2019 figures. Can you add the months? What is this showing? (Tr. at 231)

***Response*:**

Please see Economic Appendix at 11-13.

28. COMMISSIONER SCHMIDTLEIN: Okay. Maybe this is best done in the *post-hearing*, if you could just address, if you're asking the Commission to find that this has had an impact on prices. And when we look at our pricing data, you know, like I mentioned, if you look at fresh, you see where the spring beginning point for U.S. prices, that does go down.

In the peak season, prices naturally fall as more supply comes into the market during the peak season. That happens every year. When you look at what the low is for the peak season, I don't see that going down for U.S. producers. When prices start to go back up as the peak season wanes and there's less supply, you do see those ending prices declining over the POI, right?

So, if we're going to find adverse price effects, wouldn't we be looking at those endpoints? And then how does that line up with volume and how it impacts the U.S. producers? That's for fresh. (Tr. at 226-27)

COMMISSIONER KARPEL: I'm looking at Slide 27, which would seem to be a helpful slide from the Alliance's perspective in showing a relationship between import volume and price. But to do that, we need to understand what the shoulder is. What is She spring shoulder season, and what is the Fall shoulder season? If you don't agree with the Coalition's framing of those, then what are we really looking at in this Graph 27 here?

What do you think of these phases that you put up from Dr. Prusa's study on Slide 25? Like, if you were to do your own chart like this, what would it look like?

However you define these Fall and Spring shoulders, then we're going to have to look at, what happened to import volume in that timeframe? What happened to market share? What happened to prices? So we need a really clear definition so we can sort of track your argument and whether we agree whether the data shows that. (Tr. at 227-28)

***Response*:**

Please see Economic Appendix at 11-13.

29. COMMISSIONER JOHANSON: Can you please respond to the Canadian party's arguments on pages 115 and 117 of their brief that imports from Canada are not

substantial because the yearly shares have been consistently low? Imports from Canada have increased at a slower rate of other imports, and the share held by Canada is inflated because of the company's decision to move some of its facilities from Canada to the United States. (Tr. at 218)

***Response*:**

As Mr. Szamosszegi testified, the Alliance believes that the imports from Canada are substantial. First, as he indicated at the hearing, Canada remains the largest supplier of imported blueberries to the U.S. market and supplies the vast majority of its fresh blueberries during the latter half of the U.S. harvest season.[148]

Second, imports from Canada increased over the POI. As shown in the table below, total imports from Canada increased by 15.6 percent, fresh cultivated imports increased by 19.5 percent, frozen cultivated imports increased by 33.9 percent, and frozen wild imports increased by 39.3 percent. These increases are substantial.

Table 5. Imports from Canada of All Fresh, Chilled, or Frozen Blueberries[149]

	Pounds					*% Change*
	2015	**2016**	**2017**	**2018**	**2019**	**2015-2019**
Cultivated	***111,212,847***	***106,249,375***	***107,576,439***	***109,950,226***	***140,932,845***	***26.7%***
Fresh	55,446,394	47,576,899	53,375,550	56,643,595	66,246,990	19.5%
Frozen	55,766,454	58,672,476	54,200,889	53,306,631	74,685,854	33.9%
Wild	***98,000,293***	***100,242,026***	***63,778,464***	***72,766,673***	***100,818,490***	***2.9%***
Fresh	35,269,054	32,951,351	16,319,962	12,202,245	13,438,358	-61.9%
Frozen	62,731,239	67,290,675	47,458,502	60,564,428	87,380,131	39.3%
Total	209,213,140	206,491,400	171,354,903	182,716,899	241,751,334	15.6%

Further, Canada accounted for a large share of the increase that occurred in 2019. This 59 million pound increase is disproportionately large relative to Canada's import share of 32.9 percent in 2018. As shown in the table below, the increase in imports from Canada from 2018 to

[148] Staff Report, Table I-3.

[149] Source: USITC DataWeb.

2019 (adjusted for re-exports) amount to 45.7 percent of the total increase in imports (adjusted for re-exports) that year. This percentage increase is on its face significant.[150]

Table 6. Increase in imports, 2018-19 (re-exports reallocated by market share)[151]

	Quantities		*Allocated re-exports*		*Adjusted imports*		*Adjusted increase*	
	2018	**2019**	**2018**	**2019**	**2018**	**2019**	**Volume change**	**% of increase**
Argentina	23,709	22,509	(1,881)	(1,786)	21,828	20,723	(1,104)	-
Canada	182,717	241,751	(14,500)	(19,181)	168,217	222,570	54,353	**45.7%**
Chile	188,204	167,108	(14,935)	(13,259)	173,269	153,849	(19,419)	-
Mexico	72,921	93,788	(5,787)	(7,441)	67,134	86,347	19,212	**16.1%**
Peru	85,227	157,231	(6,763)	(12,475)	78,464	144,756	66,292	**55.7%**
All Other Sources	2,089	1,745	(166)	(138)	1,923	1,607	(317)	-
Re-exports	(44,033)	(54,281)	-	-	-	-	-	-
Total Imports	510,834	629,851	-	-	510,834	629,851	119,017	-

In addition, the record indicates that the high volume of imports of Canadian blueberries are priced low. Among reporting major countries, Canada's AUV is by far the lowest.[152] According to the Staff Report's pricing comparisons, Canadian blueberries were cheaper than U.S. blueberries in [ ] out of [ ] instances when comparison was possible.

[150] Canada argues that the increase in 2019 is in part the result of an intra-company shipment of "semi-finished" blueberries from Canada to its U.S. storage facilities. There is no legitimate reason to treat this importation different from other intra-company imports held in inventory subsequent to sale. Moreover, at the hearing, the company witness could not confirm that these blueberries were subsequently returned to Canada or exported.

[151] Staff Report, Table C-1.

[152] *Id.* at Table II-3, Table C-1.

Table 7. Pricing comparison between domestic product and Canadian imports[153]

	Number of Comparable Observations	**Number with Lower Canadian Price**	**Avg. Difference Where Canadian Prices Lower**
Product 1	15	14	11.2%
Product 2	18	18	11.2%
Product 5	[ ]	[ ]	[ ]
Product 6	[ ]	[ ]	[ ]
Product 7	[ ]	[ ]	[ ]
Product 8	[ ]	[ ]	[ ]
			Weighted Avg.
Total	[ ]	[ ]	[ ]

As discussed at the hearing, imports from Canada were a substantial cause of serious injury to Maine's blueberry industry during the POI. Much like Peru and Mexico, Canada significantly increased acreage devoted to blueberries far beyond the needs of its home market. Much of Canada's expansion took place in wild blueberries, which compete directly with blueberries grown in Maine. There was a significant increase in Canadian output of both cultivated and wild berries. This is confirmed by press coverage of the impact of Canadian imports on Maine's blueberry industry:

> {I}n recent years massive wild blueberry harvests in Canada and a booming market for frozen cultivated blueberries eroded Maine's prominence. Less than 20 years ago, Maine and Canada each produced about 75 million pounds. In 2017, Canada produced 206.4 million pounds, more than three times Maine's yield, according to University of Maine records.[154]

This expansion overlapped the early part of the POI. According to a U.S. GAIN report,

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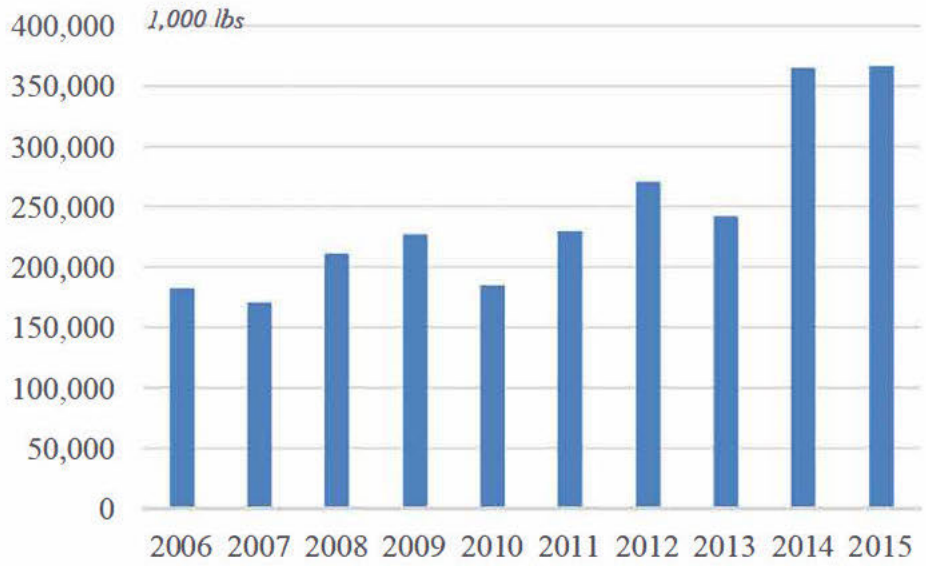
[153] *Id.* at Tables V-16 to V-23.

[154] "Tough Times for Blueberry Growers Reflect Global Struggle," Press Herald (Apr. 28, 2019), attached hereto as **Exhibit 28**.

> "From 2012 to 2016 Canada saw large increases in blueberry production with low bush blueberry production increasing 100 percent from 66,044 metric tons (MT) to 132,235 MT and high bush blueberry production increasing 54 percent from 55,737 MT to 85,769 MT."[155]

As shown in the figure below, Canada's blueberry production doubled during the ten years ending in 2015.

Table 8. Canadian Blueberry Production, 2006-2015[156]



The impact of this expansion was initially felt in Maine, which saw a dramatic reduction in prices in 2016-2017, leading to a crisis in the industry that has been exacerbated by poor weather starting in 2017. However, weather was obviously not the only culprit. In 2017, prices were at low levels not seen since the 1970s, and many harvesters left berries in the field rather

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[155] High Bush Blueberry Production in Canada," U.S. GAIN Report, attached hereto as **Exhibit 29**.

[156] North American Blueberry Council, Blueberry Statistical Record 2015 (August 2016), attached hereto as **Exhibit 48**, at 5.

than pick for such low prices.[157] Even despite the poor harvest in Maine, oversupply in the market depressed prices. David Yarborogh, who testified for Respondents at the hearing, agreed in 2018 that cheap blueberries from Canada and the weak Canadian dollar were harming Maine's industry.[158]

These issues point to the severe conceptual issues with Dr. Ludema's application of the COMPAS model. For example, Dr. Ludema only considers imports of Canadian fresh blueberries. However, the fresh and frozen sectors are inextricably linked. He also treats Maine's reduced output as an exogenous event when it clearly was driven in part by low prices caused by the very Canadian imports he seeks to exonerate.

Further to the above, Canada has been among the top five source countries of imports for the last three years, and imports from Canada grew significantly between 2015 and 2019. Under the applicable law, the Commission should make an affirmative finding regarding Canada. The Government of Canada contends, however, that the strong growth rate of Canadian imports – 15.6 percent – is "appreciably lower" than the rate of other source countries and that Canadian imports thus must be excluded under the statute.[159]

The growth rate of imports from Canada were not appreciably lower than the growth of total imports. Total imports grew by an astounding 55.7 percent during the POI. The Canadian growth rate of 15.6 percent, by any objective measure, is also a very high rate. Of the top five

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[157] "Is the blueberry industry in peril?" attached hereto as **Exhibit 30**. "Woes in the industry have caused some growers to scale back operations in Maine. Harvesters collected a little less than 68 million pounds of wild blueberries in the state in 2017, which was the lowest total since 2005 and more than 33 million pounds less than 2016. Last year's price of 26 cents per pound to farmers was also the lowest since 1985, and was more in line with the kind of prices farmers saw in the early 1970s than in the modern era."

[158] *Id.*

[159] Government of Canada's Prehearing Brief at 118 – 23.

countries exporting blueberries to the United States, Canada had the third-largest import growth rate over the years of the POI.[160] Furthermore, when viewed in the context of this case, the facts show that Canadian imports on their own constituted an important source of serious injury. Simply the *growth* in Canadian imports represented 32.5 million additional pounds of fruit shipped into this market,[161] which is equivalent to 14.4 percent of the total increase in imports from 2015 to 2019.[162] Indeed, these additional 32.5 million pounds of fruit from Canada are larger than all blueberry imports from Argentina, the fifth largest supplier to the United States, in any year of the POI.[163]

The Commission's most recent Section 201 investigations are instructive on when it is appropriate to exclude a USMCA country from its affirmative findings. In *LRWs*, the Commission excluded Canada from its affirmative findings because "there were *no imports* of LRWs from Canada during the period of investigation, and there is *no known production* of LRWs in Canada."[164] Mexico was excluded from the action in LRWs because exports to the United States had declined by 27 percent over the POI.[165] In *CSPVs*, Canada was excluded because it was not among the top five suppliers of the articles under investigation to the United States in the most recent 3 years, but even in that situation, one Commissioner dissented from

[160] Staff Report at Table C-1.

[161] *Id.* at Table C-1 (241,751 – 209-213 = 32,538).

[162] *Id.* at Table C-1 (32,538 / (629,851 – 404,433) = 0.144 = 14.4 percent).

[163] *Id.* at Table C-1.

[164] *LRWs* at 53 (emphasis added).

[165] *Id* at I-4.

Canada's exclusion given the large increase in absolute volume of imports from that country.[166] The contrast in this case is stark: Canada has been the top foreign supplier to the U.S. market for four of the last five years; and imports of Canadian fruit grew by 15.6 percent over the last five years, including 32.5 million additional pounds of fruit on an absolute basis.

The findings in *LRWs* and *CSPVs* show that, in practice, the Commission excludes countries entitled to individual consideration when the relevant imports represent a very small portion of total imports, notwithstanding permissive guidance from the statute to consider relative growth rates of imports. Indeed, Canadian Respondents' argument relies entirely on this permissive guidance, which merely states that the Commission "normally" will consider an appreciably lower import growth rate as support for excluding a USMCA country from a safeguard action. Here, not only did imports from Canada experience substantial growth, as did total imports, but the absolute volume of the increase, on its own, contributed importantly to serious injury to the domestic industry.

30. COMMISSIONER SCHMIDTLEIN: If you look at the fresh -- the pricing data for fresh blueberries, which starts at Figure V-2, 5-2, in the staff report. Let's start with the fresh. If you start with Product 1, you can see here that the starting price, in what we're calling the shoulder season in the Spring. It goes down over the years at least for pricing Product 1. The ending price in the Fall goes down as well. You know, it's a little irregular, goes up a little bit in 2017 but goes down overall.

The average price during what is the peak season at least for Product 1 actually goes up some and then down a little bit but never falls below what it is in 2015. So I just want to make sure I understand the pricing argument.

If you look at Product 2 in the staff report 1 in terms of what happened during the peak season, again, you don't see, at least by these pricing products, peak-season prices on average for the U.S. going down over the five years.

It looks like, at least for Pricing Product 1, you do see starting prices and ending prices in the Fall, in the Spring and the Fall goes down. So is the argument that you

[166] *CSPVs* at 67, n.387.

make your money in the shoulder seasons -- that that's where the injury's occurring, in the shoulder season?

I've also heard some argument that this is flowing through to the peak season, but it doesn't, from these numbers, look like average peak-season prices have gone down over the last five years. So I'm wondering from what's in the staff report. Is your argument that they're being injured during the peak season, or is it based on these shoulder season prices having gone down and that's cutting into their profitability? (Tr. at 222-23)

COMMISSIONER KARPEL: It looks like in 2015, the fall from the shoulder season to the peak season is a more dramatic fall than it is in 2019. And I'm wondering how that squares with your argument that as import volume is increased in the Spring shoulder season, it started to impact the peak. (Tr. at 231)

***Response*:**

Please see Economic Appendix at 8-11.

31. COMMISSIONER SCHMIDTLEIN: In the data, what would we point to? I'm also looking at the Blueberry Coalition put some evidence on the record showing that just 9 percent of domestic grower shipments occur in the shoulder periods. I don't know if you disagree with that. But that's what they calculated. (Tr. at 224)

Response:

Please see Economic Appendix at 5-8.

32. COMMISSIONER SCHMIDTLEIN: So how do you all specifically define the shoulder season? Is it different than the Respondents? (Tr. at 225)

Response:

The Alliance defines the shoulder seasons as March-April in the Spring and August-October in the Fall. Please see Economic Appendix at 5-8.

33. COMMISSIONER SCHMIDTLEIN: I've got another question on frozen. When you look at Figure V-5 in domestic, you see foreign product, subject imports, overselling U.S. product. And it's for both products here, Product 5 and Product 6.

Product 7, there is not much U.S. Product 8, a fair amount of overselling, then some underselling in the later part of the period. So, if you could address in the *post-hearing* how we should take that into account, and if they're overselling, how that would be a cause of adverse price effects if they're predominantly overselling in the frozen sector. (Tr. at 227)

***Response*:**

The record demonstrates mixed underselling in frozen blueberries, which is to be expected for a commodity product. **Exhibit 31** provides the results of the Commission's underselling analysis by country. While the aggregate results are identical to the Staff Report, the country-specific detail indicates that the instances of underselling are a less probative measure of price competition than the volume of underselling.[167] Due to differences in the relative weights of country sources and products, only [ ] percent of instances were undersold while [ ] of import volume was undersold.[168]

In particular, Canada demonstrates [ ] underselling in terms of volume. Of the volume of Canadian imports in the pricing data with available comparisons to U.S. prices, [ ] percent were undersold. As Canada accounted for more than three-quarters of frozen imports and 28.4 percent of domestic frozen consumption in 2019, the volumes of frozen blueberries from Canada should be given greater weight in the analysis.

Further, there are considerable differences in volumes between the frozen pricing products, with Product 6 (cultivated conventional frozen blueberries) and Product 8 (wild conventional frozen blueberries) accounting for the vast majority of volume. The analysis of underselling by volume also accounts for these differences.

The Commission should find mixed underselling by imports in the frozen pricing products.

34. COMMISSIONER KARPEL: You mentioned that in Dr. Prusa's analysis he underestimates or underrepresents the import volume that is reflected in the staff

[167] Staff Report at V-55; data based on Staff Report Tables V-20-23. *See* Underselling Analysis, attached hereto as **Exhibit 31**.

[168] Exhibit 31. [ ] of the [ ] instances of [ ] are for Chile and Argentina which collectively accounted for less than 20 percent of frozen import shipments and less than 8.4 percent of domestic frozen consumption in 2019. Staff Report Table IV-5.

report. Can you explain what you mean by that? Where is he getting the import volume if not from the import volume in the staff report, which is Customs data? (Tr. at 230)

Response:

The Alliance now understands that the explanatory variables labeled "Imports" in Dr. Prusa's econometric model are actually *net* imports. In preparation for the hearing, the Alliance's understanding was that these variables reflect absolute imports, which was implied by Dr. Prusa's characterization of his results.[169] Below, the Alliance responds to the analysis based on this revised understanding, which does not alter the fundamental conclusion: the regression model is not appropriate for assessing the impact of imports on U.S. prices and suffers from numerous flaws in economic logic and statistical methodology.

Net Imports Are Not Imports

First, it is nonsensical to use net imports to assess the relative impacts of various sources of supply. *U.S. shipments* of domestic blueberries compete with U.S. imports of blueberries in the U.S. market. The domestically-produced exports do not compete with imports so there is no reason for their inclusion in the model at all. By offsetting imports with U.S. exports, Dr. Prusa's dataset does not add up to U.S. consumption and thus completely distorts the impact of relative domestic and import volumes in the U.S. market. As the Commission is well aware, U.S. *consumption* equals domestically-produced U.S. shipments plus U.S. shipments of imports.[170] There are no exports in that equation, nor should there be. In contrast, the volumes

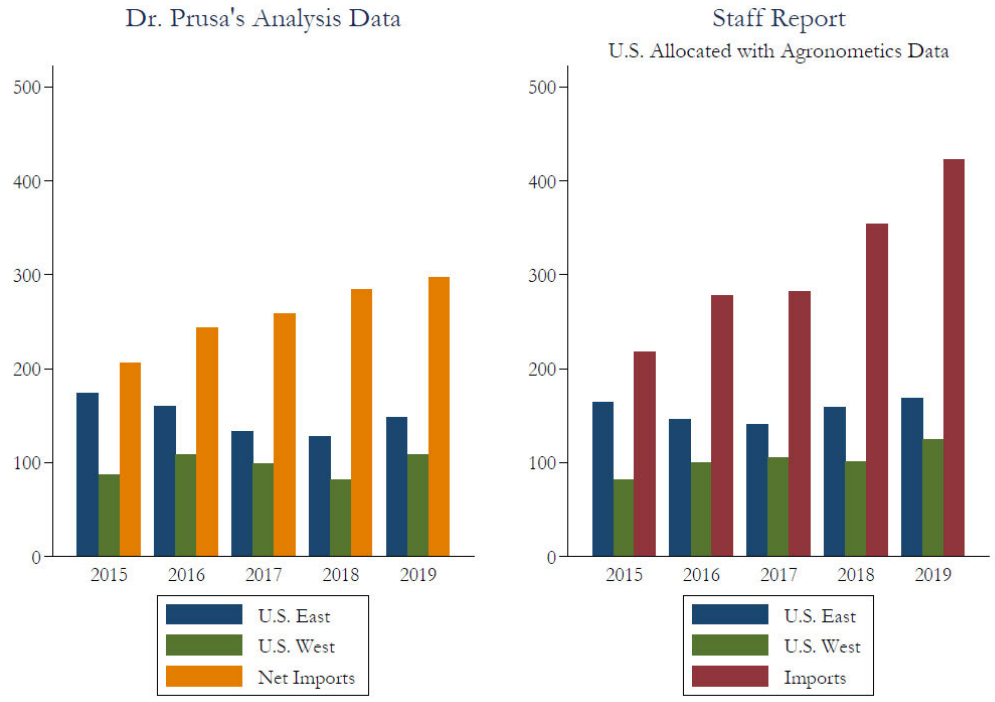
[169] Although the Report's Data explanation notes that export and re-export volumes were deducted from imports, (Prusa Report at 58) his interpretation of the regression results are not consistent with that specification. For example, "The estimates confirm that in the phases where there is the most direct head-to-head *competition between imports and domestic supply*, the point estimate of *the impact of import volume* is less than domestic supply." (Prusa Report at 60, emphasis added.) There is no way to read this sentence as meaning net imports. The imported product competing with the U.S. product are imports – not imports less U.S. exports.

[170] *See, e.g.*, Staff Report Tables IV-1, IV-3, IV-5, and C-1.

in Dr. Prusa's dataset do not add up to U.S. consumption because, instead of omitting exports altogether, he deducts exports from imports, thereby reducing the weight of imports competing in the U.S. market relative to domestic shipments.[171]

The weekly volumes Dr. Prusa deducts from imports are not trivial. As noted in the Alliance's hearing presentation, 45 of the 161 observations used in Dr. Prusa's regression reflect *negative* values for the variable used to assess the impact of import volume. Simple common sense tells you that imports into the U.S. market are never *negative*. The chart below compares the volumes reflected in Dr. Prusa's dataset to actual volumes from the Staff Report.

Figure 1: U.S. Volumes, by Source in BCHP Regression Analysis, million pounds, 2015-2019[172]



[171] By using net imports, Dr. Prusa is testing for the impact of *external trade* on domestic prices, not the impact of imports in isolation. Even if his equation were properly specified – and it is not – his import volume coefficients do not specifically measure the impact of imports on domestic AUVs.

[172] *Left panel:* Coalition's Response to Request for Data by ABGA, Jan 8 2021, Attachment 2. *Right panel:* U.S. growers' shipments of Fresh blueberries from Staff Report Table IV-3 are allocated to U.S. regions based on their annual share in the Agronometrics

Making matters worse, the stated purpose of Dr. Prusa's analysis is to attribute price effects to sources of supply.[173] He classifies sources as the U.S. "West Coast" region (California, Oregon, and Washington), the U.S. "Traditional" region (all other states), and aggregate imports.[174] The relative volume of exports from the West Coast and Traditional regions varies over the course of the year. For obvious reasons, a region's export volume is correlated to its U.S. shipment volume. In deducting exports from imports, Dr. Prusa's imports are reduced largely by West Coast volume in some points of the year and reduced largely by traditional volume in other points of the year. This completely distorts the correlations between the U.S. price and each source's relative volume. The methodology introduces a direct correlation between U.S. regional volumes and the degree to which imports are inappropriately adjusted downwards. Simply put, Dr. Prusa's model, by construction, attributes relative import volumes to U.S. regions. This explains why he comes to the illogical conclusion that West Coast volume growth depressed U.S. prices when imports (actual imports – not net imports) increased by much more than the West Coast volume on both an absolute and relative basis. Dr. Prusa's results, even if properly specified, do not answer the fundamental question about the extent to which increasing imports injured the domestic industry relative to other causes.

Not only does it make no economic sense to focus on net imports as a potential cause of serious injury, but such an approach is inconsistent with the statute and the Commission's

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Movement data; imports from official import statistics for HTS commodities 0810.40.0026 and 0810.40.0029 (fresh cultivated blueberries).

Note that this graph corrects slide 32 of ABGA's hearing presentation, which incorrectly identified the volumes in Dr. Prusa's dataset as "imports" rather than "net imports."

[173] Prusa Report at 54.

[174] Prusa Report at 55.

practice. The statute is unambiguous that the Commission is required to determine "whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry."[175] The plain language of the statute requires an assessment of "increased quantities" of imports, not an increase in imports less exports. With respect to causation, the statute specifies that the Commission should consider, among any other relevant factors, "an increase in imports (either actual or relative to domestic production)."[176] Again, this language does not refer to netting out exports, and directs the Commission to examine "actual" imports or imports relative to domestic production. In recent Section 201 investigations, the Commission looked at the effect of increased imports on the domestic industry with no mention of or adjustment for exports.[177] Here, the Commission should likewise consider the effect of the quantity of increased imports and should reject Dr. Prusa's distorted model.

Econometric Problems

Beyond the incorrect use of net imports, there are numerous issues with the Prusa Report's regression model. That is, even if one somehow thought net imports were the correct way to look at this problem, the regression does not adequately assess the question of how various sources of supply impact U.S. prices.

[175] 19 U.S.C. § 2252(b)(1)(A).

[176] 19 U.S.C. § 2252(c)(1)(C).

[177] *See, e.g.*, *LRWs* at 20 (explaining, in finding causation, that "{i}mports of LRWs increased during the period of investigation, in terms of both volume and market share" and that as "imports of LRWs nearly doubled during the period of investigation, they increased their penetration of the U.S. market to a significant degree").

First, and contrary to the report's characterization, the model does not account for any other supply and demand factors affecting U.S. prices. Although the formulas provided in the report indicate a parameter for "other exogenous variables that influence prices," these are not to be found in the regression results or the regression coded in the statistical software.[178] The only other variables are a "trend" variable (2013-14 prices) and the instrumental variables, which are not control variables.[179] Formal economic models typically account for a range of various factors such as a measure of macroeconomic or consumer demand, inputs costs, exchange rates, prices of substitute products, and many other potentially confounding factors. The report itself states: "This is a classic econometrics question – how does the volume from various suppliers, *along with other factors*, affect prices?"[180] Without accounting for any other economic information, Dr. Prusa's regression is nothing but correlations without any structural economic framework.

Second, the model does not account for seasonality in prices despite seasonality being a primary focus of the report. The correct way to assess price trends in a seasonal market is to compare prices at a particular point in time in one year with prices at the same point in time in another year. This can be done with a direct comparison across years, as the Alliance has done

[178] Prusa Report at 55-56; BCPH's Response to Request for Data by ABGA (Jan. 8 2021), Attachment 1.

[179] The instrumental variables (*i.e.,* yield, acreage, and fraction) in the two-stage regression are not control variables that account for other factors affecting prices. By design, these variables are included in the first stage of the regression to identify exogenous shocks to the explanatory variables and should be uncorrelated with the dependent variable (U.S. price) except through the impact on the endogenous explanatory variables. The Alliance does not agree that Dr. Prusa's instruments are appropriate but, whether they are or not, they certainly are not control variables.

[180] Prusa Report at 54 (emphasis added).

in Exhibits 30 and 31, or with statistical techniques. Dr. Prusa's model only accounts for differences within the season by comparing to prices from 2013-2014.

Third, the model applies a convoluted system of equations with 18 endogenous variables and dozens of instrumental variables but, as discussed above, is not a structural model. There are 73 distinct parameters in a regression with only 161 observations, meaning the model itself consumes nearly half of the available degrees of freedom and therefore has insufficient sample size. Even if this system of equations were properly specified, the data are insufficient for the model to provide reliable results.

Fourth, the motivation for instrumental variables is that they be exogenous. In a model of U.S. market prices, that means they should be determined by factors *external* to the U.S. market. However, the acreage planted in foreign countries is most certainly not exogenous – it is a reaction to U.S. market factors. As detailed in the Alliance's prehearing brief, large numbers of blueberry bushes have been planted in foreign countries, especially Peru and Mexico, with the result being greater volumes of blueberry exports to the United States from those countries.[181] This acreage was added with the express purpose of exporting more to the U.S. market. As Mr. Scarborough testified at the hearing, in many cases acres are planted in foreign countries with the specific intent of exporting to the United States and are even timed to be harvested at times when U.S. prices are relatively high.[182] Indeed, a major producer in Mexico and Peru is Driscoll's, a leading U.S. marketer of blueberries.[183] Thus, these acres are not at all exogenous to U.S. prices and are not appropriate instruments.

[181] ABGA's Prehearing Brief at 66 – 70.

[182] Tr. at 83 – 85 (Mr. Scarborough)

[183] *Id.* at 83 (Mr. Scarborough)

Fifth, even if one ignores the problems discussed above, Dr. Prusa's model still finds price-depressing effects of *net* imports. As shown in the Report's Table 21, the regression returns a negative and statistically significant coefficient for "imports" (which are actually net imports) in each of the phases of the year defined by Dr. Prusa.[184] For example, the coefficient for net imports in the fall shoulder (phase 5) is -0.382 and statistically significant. Based on the interpretation offered in the report, this means that a one-million-pound increase in net imports in the fall shoulder results in a 38.2-cent decrease in the U.S. price relative to the 2013-14 price. Thus, to the extent these results mean anything, they indicate price depression and injury.

For the reasons stated above, the Commission should give no weight to the statistical analysis provided in the Prusa Report. However, to the extent the Commission seeks to explore Dr. Prusa's analysis further, the Alliance suggests that the Commission consult with its Research Division, which has considerable expertise in econometric modelling of trade flows and their impact on U.S. prices. Specifically, the Research Division could provide guidance on whether it is appropriate to run a two-stage least squares regression with 18 endogenous variables and dozens of instrumental variables on a dataset with only 161 observations.

35. COMMISSIONER KARPEL: For Slide 20, if you could produce that for a time series over the POI and not just for 2020, that would be appreciated. (Tr. at 238-39)

Response:

The tables below reproduce Slide 20 from the Alliance's slide deck for the remaining years of the POI, as requested. That slide demonstrates that from 2015 to 2020, the subject imports increased significantly early in the U.S. season – by a larger amount than domestic production – which caused domestic prices during those months to decline. The price declines

[184] Prusa Report at 61.

shown in Slide 20 cannot be attributed to increased domestic supplies because the majority of supply additions, by far, were due to increases in the subject imports.

Note that the tables, which reflect data in Exhibit 69 of BCPH's prehearing brief, begin with week 13 because there was no domestic price for week 12. The purpose of these tables is to demonstrate the extent to which import volumes increased during the beginning of the primary U.S. harvest season relative to 2015. Each table provides the percentage of additional supply relative to 2015 supply that was caused by increased imports (first data column) and the change in the domestic price relative to 2015 prices. For a more detailed presentation of causation based on more comprehensive data, please see the Economic Appendix (pages 11-13).

The table below compares import supply and domestic prices in 2016 relative to 2015. There was no price given for domestic supplies in week 13. In the remaining weeks, imports were lower relative to 2015, as was domestic supply. Overall, total supply in these weeks was 11.2 million pounds lower than in 2015. As one would expect, year-on year prices in 2016 were higher than in 2015. These results demonstrate that a reduction in import volumes is associated with higher prices for U.S. growers, though the increase reflects reductions in U.S. output as well.

Table 9. Weeks 13-16: Import Share of Additional Supply & Changes in Domestic AUV, 2015 v. 2016[185]

	Import share of additional supply	Change in domestic AUV ($/lb)
Week 13	47%	n/a
Week 14	0%	1.55
Week 15	9%	3.08
Week 16	31%	3.18

[185] Source: BCPH's Prehearing Brief, Exhibit 69, panels for 2015 and 2016.

The table below compares import supply and domestic prices in 2017 relative to 2015. Overall volumes during the period were 3.2 million pounds greater than in the corresponding weeks in 2015. The negative share in import supply in week 13 reflects a decline in domestic volume relative to the corresponding week in 2015. In week 14, the increased supply was driven by domestic growers, but in the remaining weeks, domestic supply was flat and the overall increase in supply was modest. As a result, the price declines relative to 2015 were also modest.

Table 10. Weeks 13-16: Import Share of Additional Supply & Changes in Domestic AUV, 2015 v. 2017[186]

	Import share of additional supply	Change in domestic AUV ($/lb)
Week 13	-83%	-0.14
Week 14	31%	-0.91
Week 15	100%	-0.13
Week 16	129%	-0.07

The years 2018 and 2019 were characterized by increasing imports relative to 2015, which translated into substantially lower prices during these Spring weeks. The table below compares import supply and domestic prices in 2015 relative to 2018. In 2018, the quantity supplied during these weeks exceed 2015 by 7.9 million pounds, the vast majority supplied due to imports. Prices were substantially lower than in 2015 during each week. The negative percentage in week 16 is the result of a slight decline in domestic output that week relative to 2015. Because increases in import supply accounted for the vast majority of increased supply during this period, the decline in the price relative to 2015 cannot be attributed to domestic competition.

[186] Source: BCPH's Prehearing Brief, Exhibit 69, panels for 2015 and 2017.

Table 11. Weeks 13-16: Import Share of Additional Supply & Changes in Domestic AUV, 2015 v. 2018[187]

	Import share of additional supply	Change in domestic AUV ($/lb)
Week 13	84%	-0.92
Week 14	91%	-1.53
Week 15	92%	-0.51
Week 16	-600%	-0.24

The table below compares import supply and domestic prices in 2015 relative to 2019. Supply in 2019 was 12.2 million pounds greater than in 2015 and imports accounted for the 6.9 million pounds of this increase. Thus, competition among domestic producers could not have been the primary cause of the price declines shown in the table.

Table 12. Weeks 13-16: Import Share of Additional Supply & Changes in Domestic AUV, 2015 v. 2019[188]

	Import share of additional supply	Change in domestic AUV ($/lb)
Week 13	73%	-1.51
Week 14	46%	-1.88
Week 15	50%	-0.75
Week 16	52%	-0.74

Indeed, it is reasonable to wonder why such an increase in imports was needed given that domestic output was already increasing. The reason is that the export platform countries have limited-to-virtually-no domestic markets for blueberries. When supplies are available in those countries, they must be exported and a large proportion of them were exported to the United States resulting in the depressed prices shown in Slide 20 at the hearing.

36. VICE CHAIR STAYIN: How connected are the Canadian and U.S. blueberry industries? Canadian Respondents note that there has been a greater increase in U.S. blueberry exports to Canada than U.S. imports from Canada. How do you

[187] *Id.* at Exhibit 69, panels for 2015 and 2018.

[188] *Id.* at Exhibit 69, panels for 2015 and 2019.

analyze this interconnected industry under the safeguard statute definition that domestic industry, with its focus on productive resources, employed in producing the domestic product? (Tr. at 246)

***Response*:**

The notion that cross-border trade flows and corporate integration somehow preempts Canadian imports from being an important contributor to serious injury suffered by the U.S. blueberry growers is nothing more than a rhetorical assertion offered by Canadian parties, with no underlying economic evidence or logical foundations. A review of the market dynamics and the underlying data demonstrates why the Commission should reject the Canadian parties' arguments.

Total cross border trade: Attached at Exhibit 38 is a summary of U.S./Canada blueberry trade flows, as well as a detailed, month by month break-out of U.S. blueberry exports to Canada and imports from Canada into the United States. First, the summary data clearly shows that Canada ships substantially more blueberries to the United States than the United States ships to Canada. Between 2015 and 2019, Canada shipped on average 241 million pounds of blueberries to the United States, while the United States shipped 122 million pounds to Canada. Thus, Canada shipments to the United States exceed U.S. shipments to Canada by a factor of two to one. The U.S. trade deficit is not surprising, given the substantial blueberry growing operations in Canada, and its relatively smaller market.[189]

When you break down the total trade flows between cultivated and wild, fresh and frozen, the following patterns emerge:

[189] Estimates for Canada and U.S. population as of July 2020: 37,694,085 (July 2020 est.) and 332,639,102 (July 2020 est.) *See* **Exhibit 32**.

Fresh cultivated blueberries: This is the category where the trade flows come closest to being in balance; however, Canadian exports to the United States still exceed U.S. exports to Canada in every year of the POI by an average of around 20 million pounds. Moreover, the seasonal distribution differs greatly. As is shown in the detailed monthly tables, the U.S. exports of fresh cultivated blueberries to Canada are concentrated in the months of March through June, when Canadian blueberry growers are not harvesting or shipping. Canadian fresh blueberry exports, by contrast, are heavily concentrated in the months of July and August, peak season months for U.S. producers.

Frozen cultivated blueberries: Canada shipped an average of 58 million pounds of cultivated frozen to the United States, compared to an average of 14.6 million pounds of shipments from the United States to Canada, for a ratio of around 4 to 1. In particular, a large portion of the British Columbia cultivated crop is directed towards the U.S. frozen market. This segment of the Canadian industry competes directly with U.S. fresh producers in Washington and Oregon that are also focusing on frozen production.

Wild blueberries (fresh and frozen): It does appear that fresh wild blueberries are being shipped in comparable volumes (on average of 20 million pounds annually) from Canada to the United States and from the United States to Canada. Because virtually all wild blueberries are frozen, the key trade flow indicator for wild is the frozen form. As shown in Exhibit 50, Canada shipped an average of 65 million pounds of wild frozen blueberries south to U.S. markets, which is over six times the volumes of U.S. product that was exported to Canada.[190] Thus, the U.S. has a substantial trade deficit in wild frozen blueberries. For wild blueberries overall (fresh and

[190] Trade Flows with Canada, attached hereto as **Exhibit 50**.

frozen), Canadian exports to the United states are nearly three times the volume of U.S. exports to Canada.

In their prehearing brief and at the hearing, the Canadian respondents suggested that the Canadian imports should somehow be reduced for some "semi-finished" wild blueberries that were shipped in 2019 from Canada to the United States.[191] There is no basis to do so. First, it is not even clear what "semi-finished" frozen blueberries might be, as blueberries at this stage are either fresh/chilled or frozen. Second, unless it could be affirmatively established that these imports used fresh blueberries from the United States (something that the parties cannot do),[192] they should be treated as imports from Canada. Third, if the Commission were to go down this road, they would have to track the origin of all fresh and frozen blueberry shipments between the two countries. There is no reason to do so. As explained above, the wild fresh blueberry trade flows between the United States and Canada roughly cancel each other out over a longer period. Thus, to measure the total net volume of wild blueberry imports from Canada, it is sufficient to focus only on the trade flows of the frozen form of the product. As mentioned, the Canadian imports of wild frozen blueberries exceed U.S. exports of this product by a factor of ten. Thus, there is no doubt that Canadian wild blueberry shipments to the United States are a contributing factor to U.S. serious injury – particularly with respect to wild blueberry growers in Maine.

[191] Canada's Prehearing Brief at 81; Tr at 47 (Ms. Bourely), 295 (Mr. Wood).

[192] *See* Tr. at 419.

37. COMMISSIONER SCHMIDTLEIN: And then another question as I want to make sure I understand your argument with regard to market share shift, which I think is part of your argument that the industry has been seriously injured. Correct?

Given that there is a portion of the year where subject imports aren't competing with domestic products, I would assume that you're talking about lost share during the shoulder periods.

When we talk about lost share, are you talking about both in the fresh and the frozen sectors? And if you're talking about fresh, does that mean the product is going into frozen, or are you saying you're just not harvesting that product? Although I would 1 assume that once you know you've lost the sale, you've already harvested it. (Tr. at 253-54)

***Response*:**

Please see Economic Appendix at 5-8.

38. COMMISSIONER KARPEL: Do you have data to support what you're saying about the shoulders -- the Fall and Spring shoulders theme where the industry makes most of its profits? So if there's any data you can show that that's where the revenue is. (Tr. at 255)

Response:

Please see Economic Appendix at 5-11.

VI. Questions Regarding Threat of Serious Injury

39. VICE CHAIR STAYIN: How do you know that the production in the foreign countries will be directed to the U.S. market, that the increase in production of foreign countries will be directed at the U.S. market? (Tr. at 210)

CHAIR KEARNS*:* We are seeing from these countries that they do have pretty significant levels of exports to those other markets and that the average unit values in those other markets are often pretty high, sometimes higher than the U.S. So can you do the analysis you already did in terms of their imports of bushes and kind of your calculations on that? But I think that was all sort of based on the idea that the same percentage of their exports would be going to the U.S. market in the future as has gone in the past. But, if demand is actually going up even more in other countries, we might expect to see a lower level of exports relative to other countries coming to the U.S.

I'm anticipating that that's going to be kind of a concern some of us have, is it's not really right to just assume that if it's 80 percent of their market goes to the U.S. in the past, it'll continue to be 80 percent in the future. (Tr. at 242)

CHAIR KEARNS*:* There are pretty significant exports to these other markets, from Latin America to China, to Japan, to the Netherlands, to Belgium, to other places in Europe.

If you all could kind of explain why that is. I don't know if it's because it's frozen or what, but it seems like it's not just maybe air shipments, but if you can tell us more about that, that would be appreciated. (Tr. at 245)

Response:

The United States accounts for the majority of the total exports from the key exporting countries. This has been the case throughout the period of investigation, and there is no information on the record of this investigation that indicates that these trends will change significantly in the near future.

The table below shows the share of total exports accounted for by exports to the United States over the period of investigation. As these data demonstrate, the United States is the most important export market for each of the key exporting countries. Specifically, in 2019, the exports to the United States accounted for 59.1 percent of exports from Argentina, 53.0 percent of exports from Canada, 49.7 percent of exports from Chile, 91.1 percent of export from Mexico, and 60.2 percent of exports from Peru. Moreover, the share of exports to the United States of total exports for Canada, Mexico, and Peru grew from 2015 to 2019. Thus, over the period of investigation, the United States has become an ever-larger focus for exports from these countries. Chilean exports to the United States as a share of total exports were flat over the period of investigation (91.4 percent in 2015 and 91.2 percent in 2019). Only Argentina saw a decrease in its exports to the United States as a share of total exports, dropping from 64.2 percent in 2015 to 59.1 percent in 2019, and, yet, the United States still accounted for well over half of total exports from Argentina in 2019.

Moreover, for the countries that are vastly increasing their blueberry growing capacity, Mexico and Peru, as detailed in the Alliance's Prehearing Brief at 65-70, the increase in the share of exports to the United States is particularly relevant. As noted in the Prehearing Brief, based on the planting of new blueberry plants in those countries, the cumulative increase in blueberry production in Mexico and Peru will exceed one billion pounds.[193] Importantly, not a single opposition witness at the hearing disputed this figure. Based on the 2019 data for share of total exports to the United States of total shipments, this will result in an increase of 664 million pounds of blueberries to the United States in the imminent future.[194]

[193] ABGA's Prehearing Brief at 68.

[194] *Id.* at 70.

Export Orientation of Key Fresh and Frozen Blueberry Producing Countries Over The POI (1,000 Pounds)						
		2015	2016	2017	2018	2019
Argentina						
	Total Shipments	19,442	22,906	21,494	24,147	20,989
	Total Exports	18,442	21,973	20,145	22,373	17,695
	Export Share of Total Shipments	**94.9%**	**95.9%**	**93.7%**	**92.7%**	**84.3%**
	Exports to the U.S.	11,840	15,874	14,200	15,994	10,456
	U.S. Export Share of Total Exports	**64.2%**	**72.2%**	**70.5%**	**71.5%**	**59.1%**
Canada						
	Total Shipments	293,515	328,677	535,165	379,395	414,044
	Total Exports	200,323	199,620	243,583	251,158	288,020
	Export Share of Total Shipments	**68.2%**	**60.7%**	**45.5%**	**66.2%**	**69.6%**
	Exports to the U.S.	125,270	123,972	112,672	120,349	152,705
	U.S. Export Share of Total Exports	**62.5%**	**62.1%**	**46.3%**	**47.9%**	**53.0%**
Chile						
	Total Shipments	175,204	220,437	215,971	234,687	247,392
	Total Exports	160,121	203,549	194,093	213,782	225,606
	Export Share of Total Shipments	**91.4%**	**92.3%**	**89.9%**	**91.1%**	**91.2%**
	Exports to the U.S.	100,213	123,696	103,964	108,472	112,121
	U.S. Export Share of Total Exports	**62.6%**	**60.8%**	**53.6%**	**50.7%**	**49.7%**
Mexico						
	Total Shipments	29,209	39,653	57,048	76,619	99,149
	Total Exports	27,736	37,724	54,485	71,661	92,349
	Export Share of Total Shipments	**95.0%**	**95.1%**	**95.5%**	**93.5%**	**93.1%**
	Exports to the U.S.	24,653	33,088	49,276	64,720	84,159
	U.S. Export Share of Total Exports	**88.9%**	**87.7%**	**90.4%**	**90.3%**	**91.1%**
Peru						
	Total Shipments	13,992	43,143	62,285	142,173	252,927
	Total Exports	13,643	42,604	60,786	132,409	228,646
	Export Share of Total Shipments	**97.5%**	**98.8%**	**97.6%**	**93.1%**	**90.4%**
	Exports to the U.S.	7,403	25,157	29,832	76,576	137,618
	U.S. Export Share of Total Exports	**54.3%**	**59.0%**	**49.1%**	**57.8%**	**60.2%**
Sources: Staff Report p. IV-28, Table IV-18, p. IV-40 , Table IV-27, p. IV-51, Table IV-36, p. IV-63, Table IV-45, and p. IV-74. Table IV-54						

Given these trends, it reasonable to assume, based on historical data, that a major proportion of production in the key exporting countries will continue to be exported to the United States in the imminent future. It is the Commission's normal practice in Title VII cases to assume that the same export proportions will apply in the imminent future. In fact, Argentina, Canada, and Chile, all project that their share of exports to the United States will increase in 2021, as shown in the table below.

Projected Export Orientation of Key Blueberry Producing Countries (2021)						
(1000 Pounds)						
	Argentina	Canada	Chile	Mexico	Peru	Total
Total Shipment	21,106	321,679	308,675	164,124	380,917	1,196,501
Total Exports	18,654	203,052	282,166	152,383	359,093	1,015,348
Export Share of Total Shipments	88.4%	63.1%	91.4%	92.8%	94.3%	84.9%
Exports to the U.S.	11,551	128,231	143,288	136,750	183,334	603,154
U.S. Export Share of Total Exports	61.9%	63.2%	50.8%	89.7%	51.1%	59.4%
Sources: Staff Report p. IV-29, Table IV-18, p. IV-41, Table IV-27, p. IV-52, Table IV-64, p. IV-64, Table IV-45, and p. IV-75. Table IV-54						

These data (based on the projections from questionnaire responses) indicate that next year, Argentina will increase its share of exports to the United States from 59.1 percent in 2019 to 61.9 percent in 2021, Canada will increase its share of exports to the United States from 53.0 percent in 2019 to 63.2 percent in 2021, and Chile will increase its share of exports to the United States from 49.7 percent in 2019 to 50.8 percent in 2021. Thus, it is not mere speculation that producers in the key exporting countries will continue to ship blueberries in the same percentage as they have historically, or even increase those export shares. The respondents' own projections show otherwise.

The Alliance would also dispute the assertion that producers in the key exporting countries have significant levels of exports to other markets and that the average unit values in those other markets are often high, sometimes higher than the U.S.

For Canada, for example, the United States accounted for 68.9 percent of total exports, and the next largest export market, Germany, accounted for only 6.9 percent of total exports in 2019. This equates to one-tenth of the volume of exports to the United States.[195] The unit value for exports to Germany was only one cent higher per pound than exports to the United States.[196]

For Mexico, the United States accounted for 86.5 percent of total exports, and the next largest export market, Canada, accounted for only 10.5 percent of total exports in 2019. This equates to one-eighth the volume of exports to the United States.[197] Moreover, the unit value of exports to Canada was a fraction of the unit value of exports to the United States – $0.87/lb versus $1.46/lb.[198]

For Argentina, the United States accounted for 63.5 percent of total exports, and the next largest export market, the Netherlands, only accounted for 15.4 percent of total exports in 2019. This equates to one-fourth the volume of exports to the United States.[199] Although the unit value of exports to the Netherland was higher in 2019 than exports to the United States, the unit value has fallen from $2.83/lb in 2015 to only $2.18/lb. in 2019.[200]

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[195] Staff Report at IV-32, Table IV-20.

[196] *Id.*

[197] *Id.* at IV-42, Table IV-29.

[198] *Id.*

[199] *Id.* at IV-54, Table IV-38.

[200] *Id.*

For Chile, the United States accounted for 46.7 percent of total exports, and the next largest export market, the Netherlands, accounted for only 11 percent of total exports in 2019. This equates to one-fourth the volume of exports to the United States.[201] Moreover, the unit value of exports to the Netherlands was only 15 cents higher than exports to the United States.[202]

For Peru, the United States accounted for 47.3 percent of total exports, and the next largest export market, the Netherland accounted for only 17.6 percent of total exports in 2019. This equates to one-third the volume of exports to the United States.[203] Moreover, the unit value of exports to the Netherlands was only 13 cents higher per pound that exports to the United States.[204]

With regard to the explosion in shipment of live plants to Mexico and Peru, respondents tried to minimize this fact by saying Mexico and Peru are not expanding production of blueberries and that all the new live plants that were shipped into these countries over the last several years will replace existing plants.[205] This assertion is not borne out by the record and is completely inconsistent with the continued expansion of acreage of both of these countries.

The Staff Report reflects a huge increase in acreage dedicated to blueberry production in Mexico, as well as a significant increase in blueberry production and yields. As the Staff Report notes, Mexico's Ministry of Agriculture reports that between 2015 and 2019, acreage dedicated to blueberries more than doubled in Mexico from 2015 to 2019, from 5,019 acres to 10,920

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[201] *Id.* at IV-66, Table IV-47.

[202] *Id.*

[203] *Id.* at IV-77, Table IV-56.

[204] *Id*.

[205] Tr. at 365 (Dr. Prusa).

acres.[206] Data from Mexican producers also show a huge increase in acres planted from 5,010 acres in 2015 to 9,893 acres in 2019.[207] Mexican producers themselves project that acreage planted will expand to 15,462 acres in 2021, an increase of 56 percent.[208] So clearly Mexican producers are not just replacing old plants, they are expanding their capacity with the new plants.

Regarding Peru, the Staff Report reflects a similar increase in acreage dedicated to blueberry production, as well as significant increases in both blueberry production and yields. The acreage planted in Peru increased from 2,861 acres in 2015 to 27,090 acres in 2019, according to Peru's Ministry of Agriculture, an increase of more than eight-fold.[209]

Acreage planted in Peru will expand again significantly in 2021. As one source notes, in 2020, Peru had 10,963 hectares (27,090 acres) under cultivation.[210] By 2021, the blueberry planting area is forecasted to grow to 14,000 hectares (34,595 acres),[211] an increase of 7,505 acres, or 28 percent. Peruvian growers themselves project a massive increase in the harvesting of blueberries in 2021, with total harvests increasing from 320.6 million pounds in 2020, to 382.7 million pounds in 2021, an increase of over 62 million pounds, or 20 percent.[212]

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[206] Staff Report at IV-33.

[207] *Id*. at IV-36, Table IV-24.

[208] *Id.*

[209] *Id*. at IV-68, Table IV-48.

[210] *Id.*

[211] *Id*.

[212] *Id*. at IV-71, Table IV-52.

Moreover, Peruvian growers have also significantly increased their yields on planted bushes over the POI, increasing from only 57.3 percent in 2015 to 78.3 percent in 2019.[213] Peruvian growers project that their yields will increase to 99 percent in 2021.[214] Finally, testimony at the hearing indicates that Peruvian growers are increasing the density of their new planting.[215] Mr. Jackson of Family Tree Farms stated about it Peruvian production, "there's a high density of planting now. So it isn't 1500 plants per acre. It might be 3,000 plants per acre that some of the people are doing."[216] Thus, based on new plantings over the past serval years, increased yields on all plants, new acres planted, and increasing the density of planting on each new acre, it is absolutely clear that production from Peru will explode in the imminent future and most of that will be directed to the U.S. market.

Thus, record data demonstrate that the United States is currently the largest market for each of the key exporting countries, that this has been the case during the entire POI, that producers in key exporting countries themselves predict an increase in their share of exports to the United States, and that the proportion of exports to other countries is unlikely to change in the imminent future.

First, it is significantly more expensive for Latin American and Mexican producers to ship to markets in Europe and Asia, than to the United States. For maritime shipping, the ocean voyage is significantly longer to Asian and European markets than it is to the United States. Moreover, this means that exporters have to incur additional costs associated with keeping the

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[213] *Id*. at IV-70, Table IV-51.

[214] *Id*.

[215] Tr. at 365 (Mr. Jackson).

[216] *Id.*

blueberries in a modified atmosphere in order to extend the shelf-life of this very perishable fruit.[217] Shipment by air is also extremely expensive. As the co-CEO of Fall Creek Farm and Nursery in Oregon notes with respect to the export opportunities for U.S. growers,

> It's going to be a challenge. Businesses, fields, infrastructure, packhouses, cooling facilities and varieties are generally designed for a domestic market, built around trucking and with naturally shorter shelf-life requirements. That does not directly transfer to a long-distance maritime export business, . . . It's not cut and paste. And airfreight is simply going to be too expensive to allow anything at scale to happen.[218]

Chair Kearns asked about air freight. A review of fresh blueberry exports from Mexico in 2020 demonstrates that for exports to countries other than the United States and Canada (which are overwhelmingly shipped by truck), Mexican exporters primarily ship by air.[219] Export declarations for Mexico for shipments to countries other than the United States and Canada for the period January-November 2020 indicate that 742 shipments were made by air, while only 47 were made by sea. Most of the shipments from Mexico by sea were to Japan, and were shipped from the Mexican port of Manzanillo.[220] The average weight of a typical shipment was 7,000 kilograms,[221] which translates into about 12 cubic meters by volume.[222] An estimate

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[217] *See* Declarations of Shelly Hartmann and Jayson Scarborough, which indicate that the additional cost of maintaining a modified atmosphere is between $0.04 and $0.05 per pound.

[218] "What are the prospects for U.S. blueberries in China?," FreshFruitPortal.com (Jul. 6, 2020), attached hereto as **Exhibit 33**.

[219] Datamyne Mexican Export Declarations for HTS 0810.40 for January-November 2020, attached hereto as **Exhibit 34**.

[220] *Id*.

[221] *Id.*

[222] A conversion of 7,000 kilograms of blueberries into cubic meters is provided at **Exhibit 35**.

of shipping times from Manzanillo to Japan from the website Freightos, indicates that shipment by sea would take 35-50 days, while an air shipment would take 9-11 days.[223]

Peru exports fresh blueberries by both air and by sea. Other than the United States, Peru's biggest export market is the Netherlands. A typical maritime shipment to the United States takes about 24-37 days,[224] while a typical maritime shipment to Rotterdam in the Netherlands takes about 38-49 days.[225] China is Peru's third largest export market for its fresh blueberries. A typical maritime shipment from Peru to the port of Shanghai takes about 40-56 days.[226]

Argentina apparently ships 50 percent of its exports by air.[227] One article notes that in 2020, Argentina had logistical difficulties scheduling air freight due to the Coronavirus. The article also highlights the importance of the U.S. market for Argentine growers, quoting Alejandro Pannunzio, who stated, "{b}lueberries are being revitalized especially in the U.S., a country with more than 300 million people and an average annual consumption of 800 grams per person."

In order to preserve the shelf-life of the berries on such long voyages, the fruit has to be placed in a modified atmosphere, in which a low oxygen, high carbon dioxide atmosphere is created, reducing the respiration rate of the blueberries, suppressing the development of rot and

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[223] Transit time for shipments from Mexico to China, s*ee* **Exhibit 36.**

[224] Transit time for shipments from Peru to the United States, s*ee* **Exhibit 37**

[225] Transit time for shipments from Peru to Rotterdam, s*ee* **Exhibit 38.**

[226] Transit time for shipments from Peru to Shanghai, s*ee* **Exhibit 39**.

[227] "Argentina blueberry industry concerned about air freight shortages ahead of season," Blueberry International Organization (May 25, 2020), attached as **Exhibit 40**.

mold, and reducing blueberry breakdown.[228] The cost of modified atmosphere packaging is significant, however, somewhere between four and five cents per pound.[229]

Second, while demand is increasing in places like China and Europe, production in those regions is also increasing significantly. Poland and Spain are both expanding their production of blueberries.[230] Ukraine, Serbia, and Morocco are also increasing production.[231] China is rapidly increasing its production of blueberries, and the USDA predicts that by 2026, China will eclipse the United States as the largest blueberry-producing country in the world.[232] South Africa is also becoming a significant factor in the blueberry export market. South Africa's production in 2020 soared to 18,000 metric tons from 11,700 metric tons in the previous season.[233] Sixty-eight percent of South Africa's production is exported.[234]

Third, it takes significant time to develop new markets, and it is not likely that the key exporting countries will be able to do this in the imminent future. For example, Mr. Bustamante suggested that Peru is planting new varieties of blueberries that will make it more successful in marketing to Asia and other markets. (Mr. Bustamante, Tr. at 308). Similarly, Mr. Vegas with

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[228] "Life Span for Blueberries - LifeSpan© Modified Atmosphere Packaging (MAP)," Amcor, attached hereto as **Exhibit 41.**

[229] *See* Declarations of Shelly Hartmann and Jayson Scarborough contained in Exhibits 4 and 5.

[230] Staff Report at IV-85-86.

[231] "The European market potential for fresh blueberries," CBI Ministry of Foreign Affairs, attached hereto as **Exhibit 42**.

[232] "USDA: By 2026 China would become the world's leading blueberry producer," Blueberry Consulting Magazine (Jul. 15, 2020), attached hereto as **Exhibit 43**.

[233] "South Africa's blueberry production soars in 2019-2021," Fresh Fruit Portal (May 6, 2020), attached hereto as **Exhibit 44**.

[234] *Id*.

Pro Arandanos stated that Peruvian growers were switching to newer varieties specifically focused for the Asian market. (Mr. Vegas, Tr. at 366). Mr. Bjorn of Driscoll's noted that "if we want to change varieties in Peru in 2023, then we've got to place the orders with our nurseries today. (Mr. Bjorn, Tr. at 377).[235] But any switch to new varieties will take time – time to order the new varieties, time to plant them, and then a period of three of four years before any of them will bear fruit. Thus, any switch to new varieties that is occurring today will not have an impact on exports in the imminent future.

Increasing production in other exporting countries, combined with the higher costs associated with exporting to Europe and Asia make it very unlikely that the trading patterns of the key exporting countries will change significantly in the imminent future. It is therefore highly reasonable for the Commission to assume that the historical proportion of total exports accounted for by exports to the United States will not change significantly in the foreseeable future.

40. CHAIR KEARNS: And then I had a question about threat. You argue that imports are increasingly overlapping with the growing season for U.S. growers. And I'm just wondering, you all have mentioned that that's due to shelter protection. But can you tell us more about that? Do you have any data that can back that up? I know you're not in the best position to comment on that, but what makes you think that the reason why the seasons are growing in the Southern Hemisphere is because of greater protection for the crops? (Tr. at 240).

Response:

There is a clear increase in the overlap of imports with the harvesting season for U.S. growers. This development is illustrated in Figure 1: Weekly Volume and Price of Domestic and Import Shipments, contained in the Economic Appendix at 3. The growth in the purple areas at

[235] See also the statement of Ms. Mendoza at the hearing that some of the newly planted varieties are going to Asia because those varieties are more popular in Asia. (Ms. Mendoza, Tr. at 391).

the March-June period, as well as the August to October period from 2015 to 2019, are particularly compelling. Protected agricultural practices have contributed to the ability of growers to extend their growing season. As noted in the ABGA's Prehearing Brief at 75-76, the use of "high tunnel" and "shade house" technologies has enabled Mexican producers to increase their yields and to extend their growing season. As noted in the ABGA's Prehearing Brief, the Mexican government subsidizes protected cultivation. The subsidy rate in 2014 for high tunnels was 200,000 pesos (US$ 14,451) per hectare and a maximum amount of 2.7 million pesos (US$ 2 million) per project for shade houses, 300,000 pesos (US$ 21,676) per hectare and up to 2.7 million pesos per project.[236] Indeed, Driscoll's blueberry availability chart shows that blueberries from Mexico are available nearly year-round, as are blueberries in California, another region that uses protected agriculture. This highlights the impact of protected growing on the extension of growing season.[237]

[236] *Id.*

[237] *See* Driscoll's Product Guide, 2019 – 2020, attached hereto as Exhibit 11.

VII. Questions Regarding Industry Adjustment

41. COMMISSIONER JOHANSON: Given that it takes newly planted bushes two to four years before they bear fruit in commercial quantities, as you all discuss at page 10 of your brief, would growers be able to make meaningful adjustments during any relief that the Commission can grant under the safeguard statute? (Tr. at 217)

Response:

Yes, growers can make significant meaningful adjustments if temporary relief is granted under the safeguard statute. Increased imports and consequent declining prices (especially in periods that formerly provided sustaining revenue) have substantially reduced revenues and profitability for domestic blueberry growers, particularly those without integrated operations with foreign farms and marketing operations. As a result, blueberry growers are unable to make capital investments, obtain financing, and take other actions necessary to compete with this aggressive import competition. A safeguard would provide important economic breathing room to enable the domestic blueberry industry to make positive adjustments in the short, medium, and long term.

If we are provided the opportunity to make adjustments, we consider that they fall within three categories of actions: increasing investment to improve efficiency and reduce costs, reforming the marketing and selling structure to enhance the bargaining power of growers, and refocusing government activities.

If safeguard relief is granted, growers (and their lenders) would have the confidence to make new and previously deferred investments to improve efficiency, increase yield per acre, and reduce costs. These actions could include new investments in controlled irrigation, equipment to protect berries from weather and pests, new higher-yielding plant varieties, new plant varieties intended to be machine-harvested for the fresh market, and improved machine harvesting equipment for such blueberries to be sold into the fresh market. Although the

introduction of new varieties may take several years until commercial production, other adjustment actions can be implemented immediately to improve competitiveness with respect to existing plants and acreage and corresponding harvest, packaging, and sale. Moreover, the preparation and planting itself would immediately provide growers with the assets in the ground that would facilitate access to financing on terms that would facilitate further adjustments.

The industry could also accelerate ongoing efforts to strengthen and organize blueberry grower groups to rebalance current market dynamics where growers are price takers with little or no leverage in the market.

In addition, government action in support of the blueberry industry could be adjusted and refocused to increase plant research, reduce the financial risks for farmers planting new and untested varieties, and increase extension services.

An effective safeguard remedy will ensure that the domestic industry can obtain sufficient returns on fresh and frozen blueberries, enable new plantings to mature and come into production, and bridge the temporary gap between its current highly vulnerable state and a more competitive and sustainable long-term U.S. and global market position.

EXHIBIT 2

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

EXHIBIT 3

Mexico ramping up, Spain delayed

A split blueberry market with short supplies for the next few weeks

“The current situation in the blueberry market is interesting and unique at the same time,” says Don Goforth with Family Tree Farms. The market is in a transitional phase with the last throws of arrivals coming in from Chile while Mexico’s program is starting to ramp up. “We are seeing a pretty good volume from Mexico and in another two weeks, production will be strong,” Goforth mentioned. Family Tree Farms has its own blueberry operation in Mexico and will be harvesting from late February/early March through the end of May.

Family Tree Farms blueberry fields

Spain has a late start

While Chile is winding down and Mexico is starting up, blueberry production out of Spain is light with a later start due to unique weather circumstances. “Normally, Spain should be in pretty heavy production by now, but cold weather, rain and wind delayed harvest. The country will have plenty of fruit, but it just takes them longer to get to a regular harvest,” Goforth added.

Light supplies in Europe create a lot of interest for Mexican blueberries. As a result, Family Tree Farms is air freighting limited volumes to customers in the UK and other parts of Europe. “It’s only a matter of weeks or even days, but we are happy to help.” The large majority of the company’s Mexican-grown blueberries make their way into the US and Canada.

Decent volume, but undersupplied

Goforth describes the current situation as a split market. Chile had a fantastic high-volume season, but the quality of the product is going down. At the same time, fresh high-quality product is starting to come in from Mexico. “During this transitional period, demand exceeds supply. I expect the short-supply situation to continue for another three to four weeks until Florida kicks in,” he concluded.

Dave Jackson, founder of Family Tree Farms

Contact:
Don Goforth
Family Tree Farms
Tel: (+1) 559-591-6280
dgoforth@familytreefarms.com
www.familytreefarms.com (http://www.familytreefarms.com)

Publication date: Mon 26 Mar 2018
Author: Marieke Hemmes

EXHIBIT 4

CONFIDENTIAL DECLARATION OF JAYSON SCARBOROUGH

1. My name is Jayson Scarborough. I manage a number of blueberry farms in Central California. I have been in the blueberry business for 10 years, first in Oregon and now in California. Among other things, I work as a "shipper/marketer" for other blueberry growers. For that work, I/my firm is compensated through a commission arrangement, which is paid as a fixed percentage of the value of the product sold to customers, with the remainder returned to the grower/packer. Therefore, I am familiar with the economics and the incentives of fixed percentage commission arrangements.

2. Anyone who is compensated through a fixed commission can maximize income by increasing the total value of sales. Value is equal to price times volume. Of course, commissionaires will be happiest when they maximize both variables; however, the reality is that any individual commission agent has much more control over volume than price for the following simple reason. The overall market sets the price of the product, especially a highly perishable product like fresh blueberries. Thus, as a commission agent, I have very little influence over the price received, and the returns to me for spending time to seek higher prices for my suppliers is relatively small.

3. Assume that I am getting a 10 percent commission. If through intensive marketing, I can manage to get an 8 percent price increase for a customer, I will obtain 10 percent of that 8 percent, or an amount equal to 0.8 percent of the total value sold. Volume is a different matter. If, under the same assumptions, I can increase the volume sold by 50 percent, I will earn additional commissions of 10 percent on that 50 percent, or five percent. Thus, if I can obtain additional contracts to sell product from large volume producers, I can greatly increase my total commission compensation. Thus, it is in the economic interest of all commission agents to increase volume. This is true regardless of the product sold.

4. The priority to maximize volume over price is especially important for a highly perishable product, like fresh blueberries. Because of the long time between planting and harvest, production decisions are taken long before the product comes to market. Once those decisions have been made, the production volumes, while subject to the vagaries of weather and other natural events, are pretty much locked in. And once those fixed costs to produce have been committed, the product is going to be sold when harvested. Thus, the total volume that is going to be sold is outside any single commission agent's control. If I don't obtain the rights to sell this volume, some other shipper/marketer will. Thus, I have every incentive to sell as much volume as I can.
5. For imported product, the incentive to maximize volume over higher prices for U.S. growers is even greater for shipper/marketers such as Driscoll's and California Giant, as they also have substantial investments in large volume production in Mexico, Peru, and Chile. Thus, Driscoll's and similar companies seek to maximize the total seasonal volume sold for these imports, as it also increases their returns on their investments in these growing regions. Indeed, I have seen shipper/marketers like Driscoll's engage in marketing campaigns during the fall shoulder season to replace U.S. production as quickly as possible with imported product.
6. One method marketers and buyers use to push U.S. production out of the fresh market is through claims of low quality. Quality assessments are inherently subjective and can differ among buyers and the marketers that influence their perceptions of quality. Marketers and buyers can use claims of sub-standard quality as an excuse to stop buying fresh domestic product in favor of imported products so they can make room for large shipments of fresh foreign berries.

7. Based on my own experience packing for Driscoll's, Driscoll's charges domestic growers a commission rate of 10 percent. My understanding is that other marketers charge about 10 percent commission to domestic growers. I also understand that Driscoll's and other marketers charge considerably higher commissions on their sales of imported blueberries.
8. There are two basic ways in which growers/marketers can extend the shelf-life of blueberries. This first is through a "controlled atmosphere" and the second is through a "modified atmosphere." In a controlled atmosphere, the berries in pallets are stored in a room or a chamber that is sealed. The oxygen is pumped out of the room or chamber and carbon dioxide (CO_2) is pumped in. This reduces the respiration rate of the fruit, essentially "putting it to sleep." The production of mold is thus discouraged, and the fruit stays fresher longer.
9. In a "modified atmosphere," the pallets of berries are placed and sealed in a special bag, that has a hose and a monitor attached to it. The hose is used to pump out the oxygen from the bag and to pump in CO_2. This has the same effect as placing the berries in a controlled atmosphere chamber.
10. At one of my farms, we have recently invested in modified atmosphere packaging. A copy of the quote from the supplier of the modified atmosphere bags is attached to this declaration, as Attachment 1. [

]. One pallet of blueberries goes in one bag. There are approximately 1180 pounds of blueberries in a pallet. (See Attachment 2 to this declaration). This translates into a cost of about four cents per pound to keep the blueberries in a modified atmosphere.
11. I have often been confronted by a glut of Mexican and Peruvian blueberries in trying to sell Oregon blueberries in September. Attached in Attachment 3 are some sample e-mails that I

received in September 2019, talking about the excess of Peruvian and Mexican blueberries in the market from Driscoll's.

12. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

01/18/2021 

(Date) Jayson Scarborough

Attachment 1

Entire Attachment Not Susceptible To Public

Summary

Attachment 2

Estimated Rows and Acres of Production Per Case and Pallet at Wholesale, Select Crops

This table combines two sets of information on crops commonly grown by small and mid-scale produce growers in North Carolina: (1) information from a grocery wholesaler on the number of cases per pallet and number of pounds per case and (2) information on ESTIMATED yields per 100' row and acre as given in this source: *Vegetable Planting Guide on the* CEFS Small Farm Unit page: http://www.cefs.ncsu.edu/whatwedo/researchunits/sfu.html*

For additional information see: *Wholesale and Retail Product Specifications: Guidance and Best Practices for Fresh Product for Small Farms and Food Hubs* at ncgrowingtogether.org/for-producers

Produce Item	# of cases per 1 pallet	# of pounds per 1 pallet	# of produce items or pounds per case	yield, lbs per 100 ft row	yield, lbs per acre	rows needed per pallet	acres needed per pallet
Asparagus, green	120 11 lb cases or 48 28 lbcases	1320-1375	11 lb / 28 lb	na	4,000	na	0.33
Beans - green	45	1125	25 lb	23	6,000	48.91	0.19
Beets - red/bulk	63	1575	25 lb	96	25,000	16.41	0.06
Beets - red/bunched	30	720	24 lb	96	25,000	7.50	0.03
Bell pepper, green or red	45	900	20 lb	115	20,000	7.83	0.05
Blueberries	132	1188	24 pints per case, 12oz/pint	na	5,000	na	0.24
Broccoli	45	900	20 lb	46	8,000	19.57	0.11
Cabbage - green	30	1350	45 lb	201	35,000	6.72	0.04
Carrot - bulk	63	1575	25 lb	99	26,000	15.91	0.06
Cauliflower	125	1400	4 count of 3 lb bags = 12 lb	75	13,000	18.67	0.11
Chard - Green	30	720	24 lb	115	20,000	6.26	0.04
Collards	30	720	24 count/24 lb	86	15,000	8.37	0.05
Cucumber slicing	70	1400	20 lb	230	20,000	6.09	0.07
Cucumbers	70	1400	20 lb	230	20,000	6.09	0.07
Eggplant	45	900	20 lb	115	20,000	7.83	0.05
Fennel	56	1400	25 lb bag	96	25,000	14.58	0.06
Kale Green	30	720	24 lb	172	30,000	4.19	0.02
Kale - Red	30	720	24 lb	172	30,000	4.19	0.02
Kohlrabi	56	672	12 count 12 lb	46	12,000	14.61	0.06
Lettuce - head	40	960	24 head	96	25,000	10.00	0.04
Lettuce - leaf	145	1450	10 lb	96	25,000	15.10	0.06
Onions green	120	1080	2 x 24 counts = 48 count (9 lb)	34	9,000	31.76	0.12
Onions - red/bagged	35	1680	16 x 3 lb bags =48 lb	80	35,000	21.00	0.05
Onions red/bulk	45	1800	40 lb	80	35,000	22.50	0.05
Onions - white/bulk	45	1800	40 lb	80	35,000	22.50	0.05
Onions yellow/bagged	35	1680	16 x 3 lb bags =48 lb	80	35,000	21.00	0.05
Onions - yellow/bulk	45	1800	40 lb	80	35,000	22.50	0.05
Onions - yellow/sweet	45	1800	40 lb	80	35,000	22.50	0.05
Peas snap	126	1260	150 pieces in 10 lb bag	23	6,000	54.78	0.21
Potatoes red/bulk	49 bags	2450	50 lb bag	298	26,000	8.22	0.09
Potatoes red/bagged	50 bags	2500	10 x 5 lb bags = 50 lb	298	26,000	8.39	0.10
Potatoes russet/bagged	50 bags	2500	10 x 5 lb bags = 50 lb	298	26,000	8.39	0.10
Potatoes russet/bulk	49 bags	2450	50 lb bag	298	26,000	8.22	0.09
Potatoes - yellow/bagged	50 bags	2500	10 x 5 lb bags = 50 lb	298	26,000	8.39	0.10
Potatoes - yellow/bulk	49 bags	2450	50 lb bag	298	26,000	8.22	0.09
Spinach - bulk/unwashed	70	280	4 lb box	23	8,000	12.17	0.04
Strawberries	50	600	10-12 pound flat	na	18,000	na	0.03
Summer Squash - zucchini	70	1400	20 lb	115	20,000	12.17	0.07
Sweet Corn	42	1100	48 ct / 20-33 lb	63	11,000	17.46	0.10
Tomatoes - slicer	48	960	20 lb	115	20,000	8.35	0.05
Turnips - bulk	63	1575	25 lb	31	8,000	50.81	0.20
Watermelon seedless	BINS	BINS	Bins 40 - 60 count, varying weights	230	20,000	na	na
Winter Squash	45	1575	35 lb	115	10,000	13.70	0.16

**Asparagus yield estimated at 4,000lbs/acre based on: http://extension.psu.edu/business/ag-alternatives/horticulture/vegetables/asparagus-production*
Blueberry yield based on mature production no irrigation: Table 9 in https://blueberries.ces.ncsu.edu/wp content/uploads/2012/10 /evaluating-the-profitability-of-blueberry-production.pdf?fwd=no
Strawberry yield estimated at 18,000lbs/acre based on: https://strawberries.ces.ncsu.edu/strawberries budgets/
All product loaded on standard 40" by 48" pallets.

Information on number of cases per pallet, pounds of product per pallet, and produce items/lbs per case will vary by wholesaler.
Information for this table was derived from the NC Growing Together project and its partner wholesalers.
Yield per row and acre varies for a number of reasons.

CEFS NC GROWING TOGETHER
Connecting Local Foods to Mainstream Markets

USDA United States Department of National Institute of Food and Agriculture

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Attachment 3

Entire Attachment Not Susceptible To Public

Summary

EXHIBIT 5

DECLARATION OF SHELLY HARTMANN

1. My name is Shelly Hartmann. My family has owned and operated True Blue Farms in Grand Junction, Michigan for the past 30 years. We are third generation blueberry farmers. At our operation, we are the grower, packer, and marketer. I also serve as the vice-chair of the board of the United States Highbush Blueberry Council ("USHBC"), Secretary of the Michigan Blueberry Commission, and current President of the Michigan Frozen Food Packers Association. I have served on many USHBC and North American Blueberry Council committees and boards over the years.
2. Based on my own experience in Michigan, commissions that growers pay to marketers is in the range of seven to eight percent.
3. Customers make their own quality assessments, which are fundamentally subjective in nature. Buyers can differ greatly on what they deem "quality" for fresh product. The same load could be rejected by one or two buyers and be accepted by another. It is often the marketer that is influencing buyers' perceptions of quality, and generally in accordance with economic incentives that favor imports. Because blueberries are perishable, marketers often want to clear the market to accommodate large shipments of imports. As a result, claims of poor quality are often used as a pretext to make room for imports that marketers sell in massive volumes.
4. Most varieties of cultivated blueberries can be sold fresh or frozen. Although some varieties may hold up better during the freezing process, freezing is a method that can extend the shelf life of blueberries regardless of their variety.
5. In Michigan, growers have planted and harvest a very wide range of legacy and novel blueberry varieties, including the following:

Aurora	Berkeley	Bluecrop	Bluegold
Bluehaven	Bluejay	Blueray	Bluetta
Bonus	Brigitta	Burlington	Cargo
Collins	Coville	Darrow	Draper
Duke	Earliblue	Elliott	Envy
IndigoCrisp	Jersey	Keepsake	Last Call
Legacy	Liberty	Nelson	Northland
Patriot	Pemberton	Rancocas	Rubel
Sensation	Spartan	Top Shelf	Toro
Valor			

6. Maintaining fruit in a modified atmosphere package is expensive. I would estimate, based on my own experience that such packaging adds about $0.05 per pound of blueberries. Moreover, this would be our domestic cost. The costs associated with exporting blueberries under modified atmosphere would be much higher. Also, it is not just the cost associated with the modified atmosphere that is expensive, you also have to factor in the loss that is associated with long sea voyages under modified atmosphere. While modified atmosphere can prolong the shelf-life of the blueberries, there is still a significant loss of fruit due to spoilage under modified atmosphere. When blueberries are shipped in a vessel, they are not typically packed for a consumer sale; they are in a bulk pack. They will have to be packaged in clamshells at the point of destination for sale to consumers. When that happens there will be shrink-loss of fruit due to the ride over and the packaging. For example, if you ship 50,000 pounds of blueberries on a vessel, they hit the port, they get packed for sale to

consumer, not all of the 50,000 pounds will make it to the final package. This mainly would be due to quality for various reasons. So of the 50,000 pounds that were shipped, perhaps only 45,000 pounds will go to the fresh market. The remaining 5,000 is thrown away or could make its way into the frozen market. In sum, there is more to the cost of a modified atmosphere or controlled atmosphere program besides just the packaging and service of program.

7. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

1-19-21
(Date)

Shelly Hartmann

EXHIBIT 6

Blueberries







Blueberry

Growing Areas and

Availability

Calendar

Year Round Supply

Blueberries with Always Fresh Farms are available year round. Our extensive group of farms stretch over 6,500 miles to ensure no matter what season it is or where you are, blueberries can be enjoyed. While the North American season starts in Florida and stretches to Michigan, imports in the winter are brought in mainly from Argentina, Chile, and Peru.

Blueberry Availability By Region

	January	February	March	April	May	June	July	August	September	October	November	December
Florida			■	■	■							
Georgia				■	■	■	■					
North Carolina					■	■	■					
New Jersey						■	■					
Michigan							■	■	■	■		
British Columbia							■	■	■			
Mexico			■	■								
S. America	■	■	■						■	■	■	■

EXHIBIT 7

Month	8

Sum of Quantity	Column Labels						% Change	
Row Labels	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	2015-2019	2015-2020
Peru	**407,184**	**683,708**	**135,463**	**2,269,588**	**4,624,964**	**11,611,132**	1036%	2752%
Fresh	**407,184**	**683,708**	**135,463**	**2,269,588**	**4,452,424**	**10,228,828**		
Cultivated	407,184	683,708	135,463	2,269,588	4,452,424	10,228,828		
Wild	0		0	0	0	0		
Frozen	**0**	**0**		**0**	**172,540**	**1,382,303**		
Cultivated	0	0		0	172,540	1,382,303		
Wild				0	0	0		
Grand Total	**407,184**	**683,708**	**135,463**	**2,269,588**	**4,624,964**	**11,611,132**		

Month	9

Sum of Quantity	Column Labels						% Change	
Row Labels	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	2015-2019	2015-2020
Peru	**1,973,016**	**4,268,486**	**2,846,766**	**7,201,786**	**19,319,114**	**29,219,218**	879%	1381%
Fresh	**1,940,019**	**4,268,486**	**2,846,766**	**7,095,929**	**19,118,833**	**28,096,246**		
Cultivated	1,940,019	4,268,486	2,846,766	7,095,929	19,118,833	27,963,122		
Wild	0		0	0	0	133,124		
Frozen	**32,997**	**0**		**105,857**	**200,281**	**1,122,972**		
Cultivated	32,997	0		105,857	200,281	1,122,972		
Wild				0	0	0		
Grand Total	**1,973,016**	**4,268,486**	**2,846,766**	**7,201,786**	**19,319,114**	**29,219,218**		

Month	10

Sum of Quantity	Column Labels						% Change	
Row Labels	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	2015-2019	2015-2020
Peru	**2,452,884**	**6,558,319**	**11,582,635**	**23,487,338**	**31,295,293**	**47,496,501**	1176%	1836%
Fresh	**2,452,884**	**6,558,319**	**11,582,635**	**23,226,554**	**31,137,469**	**46,869,968**		
Cultivated	2,452,884	6,558,319	11,536,607	23,226,554	31,103,672	46,670,017		
Wild	0		46,028	0	33,797	199,950		
Frozen	**0**	**0**		**260,784**	**157,824**	**626,533**		
Cultivated	0	0		260,784	157,824	626,533		
Wild				0	0	0		
Grand Total	**2,452,884**	**6,558,319**	**11,582,635**	**23,487,338**	**31,295,293**	**47,496,501**		

EXHIBIT 8

https://twitter.com/FamilyTreeFarms/status/1292860817214496769

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Family Tree Farms
@FamilyTreeFarms

Peru blueberry season is here 🙌 Keep an eye out for them in your local grocery store!

12:30 PM · Aug 10, 2020 · Sprout Social

9 Likes

EXHIBIT 9

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

EXHIBIT 10

CONFIDENTIAL DECLARATION OF [ ]

1. My name is [ ]. I am [ ], California. I am also [ ]. I thus have extensive experience in the planting, maintaining, harvesting, and selling blueberries in California.

2. During the Section 201 hearing, I heard comments regarding blueberry production in California that I wanted to take the time to comment on, including false and misleading statements of those appearing in opposition to safeguard relief. These comments included:

- "California is not a March production area." (David Jackson)
- "Jalisco and Michoacán do not produce at all during the domestic season." (Soren Bjorn)
- "They are complaining about a part of the year domestics can't even serve, it's laughable." (Matt Nicely)

3. First, I understand and can respect David Jackson's point of view. From driving the I-5, I could see that Family Tree spent a tremendous amount of time and money to get earlier fruit in the January through March window in Kettleman City. Family Tree, alongside a lot of other growers in the Central Valley, have attempted this without success. [ ] know that 130 miles away, you can produce high yielding, top quality blueberries that yield 75% or more of their production curve during this January-March window. [ ] more than 10 years ago with substantial acreage.

Unfortunately, [ ] have all ceased growing in this window for one reason – price degradation/collapse created by increased imports of foreign fruit.

4. So, [ ] large amount of fruit can be produced in California from January through June. Driscoll's and Reiter Affiliated Companies (RAC) also know this. In fact, RAC and Driscoll's used to farm and market significant acreage of blueberries from the Santa Rosa Valley in Ventura County all the way to Santa Maria in Santa Barbara County where they produced January through June. For some reason, in the past 2 to 3 years, they have significantly reduced or eliminated most of that acreage. [

]

5. [

]

6. In Joe Barsi's opening statement yesterday, [

]

7. The Coalition's members said in the hearing that they do not dump imported fruit into the market by dropping the price. However, it happens quite often, and it happens every year. I have received plenty of phone calls from marketers over the past few years stating that ships showed up to port with a ton of fruit, and as soon as they can work through that volume, we should see the prices go back up. The problem with this is that we harvest on a schedule and need to maintain this schedule in order to keep our rotations on blueberry blocks up, so we don't jeopardize our quality. So, when fruit is dumped, we normally make the decision to harvest anyways, even if it is at a loss, so we do not lose out on future opportunity.

8. Right now, we compete with a lot of imports from Biloxi varieties, particularly from Peru and Central Mexico. This is a terrible piece of fruit, and I am sure the marketers can attest to that. Although it may have a good visual appearance, its taste is awful, particularly as compared to domestic blueberries that are from other varieties and are not picked early, preserved, and shipped on a boat for a couple of weeks.

9. California can produce extremely large volumes to the market from January through June it is proven and not "laughable." [

] The fact is with the downward trend of the blueberry market, currently it would be in Mr. Nicely's term "laughable" for me to go to a lender or investor and request funding.

10. The reason the questionnaire response rate was low was because of farmers hesitancy about being on the opposing side of their marketer. There are other marketers out there that would support this initiative but have a fear of retaliation from their Mexican growers. Put the two together, and obviously the U.S. grower is backed into a corner.

11. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

8-15-2021 [ ]

(Date) [ ]

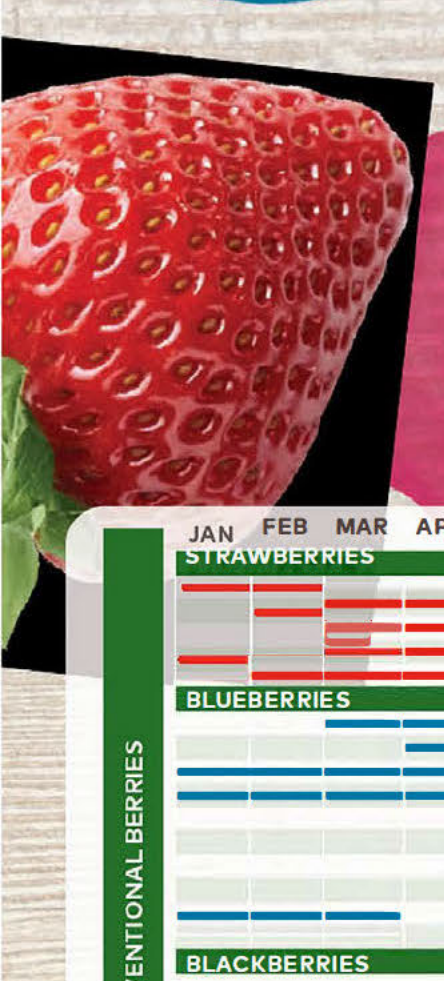
EXHIBIT 11

Driscoll's®

Only the Finest Berries™

Product Guide

2019 - 2020



	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	GROWING REGIONS	LOADING POINTS
CONVENTIONAL BERRIES	**STRAWBERRIES**													
													Oxnard	Oxnard, CA
													Santa Maria	Santa Maria, CA
													Watsonville and Salinas	Watsonville and Salinas, CA; Dover, FL
													Central Mexico	Yuma, AZ; McAllen, TX; Dover, FL; Laredo, TX
													Florida	Dover, FL
	BLUEBERRIES													
													Florida	Dover, FL
													Georgia	Lake Park, GA
													California	Oxnard, Salinas, Santa Maria and Watsonville, CA; Yuma, AZ
													Baja and Central Mexico	Oxnard, CA; Yuma, AZ; McAllen, TX; Laredo, TX
													North Carolina	Rocky Point, NC
													Washington	Watsonville, CA; Burlington, WA
													Oregon	Watsonville, CA; Conby, OR
													British Columbia, Canada	Watsonville, CA; British Columbia, Canada
													Chile	Yuma, AZ; Watsonville and Oxnard, CA
													Peru	Oxnard and Watsonville, CA; Yuma, AZ
	BLACKBERRIES													
													Watsonville, Santa Maria and Oxnard	Watsonville, Solinas, Santa Maria and Oxnard, CA
													Pacific Northwest	Watsonville and Salinas, CA
													Central Mexico and Hammonton, NJ	Yuma, AZ; Oxnard, CA; Dover, FL; McAllen, TX; Hammonton, NJ
													North Carolina	Rocky Point and Hendersonville, NC
													Baja California, Mexico	Oxnard, CA
	RASPBERRIES													
													Watsonville and Salinas	Watsonville and Salinas, CA
													Santa Maria	Santa Maria, CA
													Oxnard	Oxnard, CA
													Baja California, Mexico	Yuma, AZ; Oxnard, CA
													Central Mexico	Yuma, AZ; McAllen, TX; Dover, FL; Oxnard, CA; Laredo, TX
ORGANIC BERRIES	**ORGANIC STRAWBERRIES**													
													Oxnard	Oxnard, CA
													Baja California, Mexico	Yuma, AZ; Oxnard, CA
													Santa Maria	Santa Maria, CA
													Watsonville and Salinas	Watsonville and Salinas, CA
													Central Mexico	Yuma, AZ; McAllen, TX; Dover, FL; Laredo, TX
	ORGANIC BLUEBERRIES													
													Washington	Watsonville, CA; Grandview and Burlington, WA
													California	Watsonville, Salinas, Santa Maria and Oxnard, CA
													Baja California, Mexico	Yuma, AZ; Oxnard, CA
													Oregon	Watsonville, CA; Conby, OR
													Chile	Yuma, AZ; Watsonville and Oxnard, CA
													Florida	Dover, FL
	ORGANIC BLACKBERRIES													
													Watsonville, Santa Maria and Oxnard	Watsonville, Salinas, Santa Maria and Oxnard, CA
													Central Mexico	Yuma, AZ; Oxnard, CA; McAllen, TX
													Baja California, Mexico	Oxnard, CA
	ORGANIC RASPBERRIES													
													Watsonville	Watsonville and Salinas, CA
													Santa Maria	Santa Maria, CA
													Oxnard	Oxnard, CA
													Baja California, Mexico	Yuma, AZ; Oxnard, CA
													Central Mexico	Yuma, AZ; McAllen, TX; Dover, FL; Laredo, TX

EXHIBIT 12

FreshFruitPortal.com (https://www.freshfruitportal.com)

Port of Hueneme secures on-dock cold treatment in "game changer" for blueberries

November 13 , 2020

California's Port of Hueneme has become the first West Coast port to be able to provide on-dock cold treatment, in a move that will allow it to bring in blueberries from Peru under the USDA pilot program.

Hueneme, the only deep-water California port between Los Angeles and San Francisco, has been able to receive completed cold-treated produce containers for years, but only now is it going to offer the ability of completion of this treatment on-port.

This new service is the first of its kind on the West Coast and stands to reduce the cost of transporting blueberries, eliminate thousands of pounds of greenhouse gases, and support local California and Peruvian growers.

Oxnard Harbor District Board President Jess J. Ramirez stated: "This new opportunity is not only a game-changer for our blueberry partners, but also will help reduce air emissions across the U.S. and spur local job creation, a win-win-win."

This new service will begin immediately as a one-year pilot program, and will eliminate

over 2.2 million vehicle miles traveled (VMT) across the U.S.

The blueberries will be imported from Peru's Callao and Paita Ports via the Port of Hueneme, a specialized seaport in the reefer segment located near the largest consumer base on the West Coast market for which these blueberries are intended for, instead of being trucked from the East Coast.

This reduction will consequently cut air emissions by 3,660 tons of CO2, 11.56 tons of NOx, 900 pounds of PM10, 820 pounds of PM2.5, and 60 pounds of SOx each year of the pilot.

"I would like to thank our partners at USDA, CDFA, and Ventura County Agricultural Commissioner Ed Williams for their collaboration and faith in our Port to bring this program to fruition," said Kristin Decas, CEO & Port Director.

"This new pilot program will enable blueberries to come directly to the West Coast from Peru during the growing off-season in the United States, benefiting consumers and local blueberry companies alike."

Additional safeguards will be implemented to help reduce any risk of insects hitching a ride on the blueberries to California including: monitoring, security, and working closely with the local Ventura County Ag Commissioner and Customs and Border Protection Agricultural Inspectors as the blueberries arrive.

You might also be interested in

Dutch customs seize OZblu blueberries shipped from ...
(https://www.freshfruitportal.com/news/2020/10/28/dutch

Second OZblu blueberry shipment from South Africa ...
(https://www.freshfruitportal.com/news/2020/11/06/second-

EXHIBIT 13

News

Peru blueberry exports 2020: record low price and record volume

13/01/2021

In 2020, as we forecast in the annual review of the berry business , Peru has consolidated its leadership as a world leader in blueberry exports. According Agrodata PeruIn 2020, Peru increased its blueberry exports by 27,5% to 155.600 tonnes, widening the gap with Chile, where the growth of blueberry exports was less significant.

However, the dynamic drop in the average export price of Peruvian blueberries is a factor to consider. The average price of blueberries exported from Peru in 2020 fell dramatically by 19,4% and was a record low since the country's entry into the world export market. Thus, total export earnings increased less than 3% to $ 833 million despite the strong increase in volume.

Naturally, the decrease in the average export price led to a reduction in the profitability of the blueberry business for growers. However, since most of Peru's blueberry plantations are just beginning to bear fruit, the overall income of most farmers has not decreased.

The main export destination for Peruvian blueberries in 2020 was the United States, which bought 52% of the total export volume. At the same time, farmers who grow blueberries in the United States have recently actively protested against the increase in the supply of blueberries from Peru. They plan to take steps to protect their market.

The Netherlands, China, United Kingdom, Hong Kong and Canada were also important markets for blueberries from Peru. The largest blueberry exporters in Peru were Camposol SA. Hortifrut Peru SAC. Complejo Agroindustrial Beta SA. Agrovision Peru SAC. Agricola

Santa Azul SRL, Agroberries Peru SAC, Danper Trujillo SAC and Agricola Cerro Prieto SA.

It is worth mentioning that EastFruit analysts predict a drop in blueberry prices in Ukraine and Georgia in 2021 due to the expected strong increase in production in these countries and in Spain, Poland and the entire region.

Source

Previous article

US Blueberry Industry Groups Face Off in Business Audience

next article

Advancements in Low Chill Blueberry *Vaccinium corymbosum* L. Tissue Culture Practices

ARTÍCULOS RELACIONAOOS

Senators warn of setback in Mexico's blueberry investigation

Groups from the US blueberry industry clash in audience ...

USBlueberry Growers Testify to ITC on Damage to ...

CONTACT US AT

Chile
contact@blueberriesconsulting.com

Peru
contactoperu@blueberriesconsulting.com

Mexico
contactomexico@blueberriesconsulting.com

Spain
contactoespana@blueberriesconsulting.com

morocco
contactmorocco@blueberriesconsulting.com

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CURRENCY CONVERTER

USD - Dólar estadounidense	$	1
EUR - Euro	€	0.82
CLP - Peso chileno	$	737.43
CLF - Unidad de Fomento	UF	0.025
PEN - Nuevo sol	S/.	3.60
MXN Peso mexicano	$	19.82
COP Peso colombiano	$	3 470.43
MAD - Dirham marroquí	د.م.	8.92

Enero 15, 2021 11:45:02

EXHIBIT 14

PAST ISSUES:

>> Spring 2018
>> Fall 2017
>> Spring 2017
>> Fall 2016
>> Spring 2016
>> Fall 2015
>> Spring 2015

MARKET EXPERT EXPLAINS THE PRICE INCREASE THAT DIDN'T HAPPEN

With the health benefits of blueberries universally recognized, the blueberry industry is "in a fantastic position," according to Rod Cook, president of Ag-View Consulting in Olympia, Washington. Look a little deeper, though, and several challenges can be seen cropping up.

Rod Cook of Ag-View Consulting at the Oregon Blueberry Conference said the blueberry industry is in a fantastic position, but challenges are on the horizon.

In a presentation at the 2018 Oregon Blueberry Conference, Cook said increased competition from Chile, Mexico and Peru is having a negative effect on price. Last year, the increased competition for domestic and foreign markets, among other factors, offset reduced supply from all major U.S. blueberry production areas and the price increase most expected never materialized.

"We were down dramatically, not just from the previous year, but from the previous four years," Cook said of U.S. production. "So, we would think we were looking at decent prices. But we weren't."

In addition to increased competition from Chile, Mexico and Peru, Canada, which typically doesn't ship substantial quantity to the U.S., did so last year, and a fear of low prices in the processed market drove U.S. producers to push a higher percentage of fruit into the fresh market than is typical, he said. As evidence, Cook noted that despite the U.S. production being down 100 million pounds, fresh shipments during prime shipping points was up 20 million pounds.

"That is because so much of our fruit entered the fresh market that traditionally goes to the processed market," Cook said. "Why? It had a lot to do with the anticipation of what we expected in the processed market (because of a high carryover crop the previous year).

"The anticipation of the poor pricing, I think helped drive many of us to try to ship more of our crop into the fresh market than would have otherwise gone," Cook said.

The cold storage numbers, which in 2016 were 50 to 60 million pounds above previous cold storage reports, eventually evened out, he said, but not until June when the loss of the Southeast U.S. processed crop began to enter into the picture.

Despite the fact that processed supplies today are about where they should be, prices still have not reached points where producers believe they should be, Cook said. "It is better now than it was a year ago, but it is not above a dollar, where we think it should be," he said.

One reason behind this, he said, is that Chile shipped a higher percentage of its production into the processed market this year than in previous years.

"Some of it is coming to the U.S., some of it to Europe and other markets," Cook said. "So, the Northwest, which has relied on a lot of these export markets is facing increasing competition.

"Unlike fresh, frozen blueberries, wherever they are grown around the world, become an immediate competitor to what you are growing," he told conference participants. "So, there isn't this easy out that there used to be in the marketplace."

Overall, despite these challenges, Cook said he believes the industry is in good shape. "I do believe that we continue to be in a fantastic position," he said. "We continue to find virtually no bad news of the health benefits of blueberries, and the next couple of generations have found blueberries to be a fantastic crop."

Still, as global production continues to increase, aggressive marketing will be needed to outcompete other fruit for market share, Cook said.


Market Expert Explains the Price Increase That Didn't Happen >>>


World Blueberry Production Continues Ascent >>>


Researchers Analyze a New Product to Improve Fruit Quality >>>


Pollinator Professor Breaks Down Last Year's Spotty Fruit Set >>>

Lawyer Offers Tips on Preparing for ICE >>>


In Chile, Increased Competition and Increased Consumption >>>


Peru: The New Elephant in the Room

>>>

The Importance of Bee Protection Protocols >>>

Chef Benson Takes Home Appreciation Award >>>

2018 OSU Blueberry Field Day >>>

2019 Oregon Blueberry Conference Save the Date >>>

EXHIBIT 15

Hapag-Lloyd

JAN 30, 2018

How Blueberries are transported around the world

Every year, over 20 thousand TEUs of blueberries are transported worldwide. Rated as one of the world's healthiest foods due to its high level of antioxidants, blueberries have become a popular fruit that is a part of every healthy diet.

With much of the supply being exported from South America and South Africa, there is limited time to bring fresh blueberries to the North American and European markets. Consumers expect the very best produce while shopping and producers are constantly under pressure to deliver the best quality produce.

After fruits are harvested, the fruit is still "alive". To transport these delicate commodities, an environment where the atmosphere is controlled, and the ripening process is slowed down is required. Without this process, fruits would ripen and quickly deteriorate. Just think of how fast bananas ripen when you take them home from the supermarket.

This is where Controlled Atmosphere Technology comes in. This technology is used to help these sensitive commodities travel longer distances, like those between Chile and Europe. Hapag-Lloyd typically uses its ExtraFresh technology to control the interior atmosphere of a **reefer container (https://www.hapag-lloyd.com/en/products/cargo/reefer/overview-reefer.html)** to slow respiration so that the shelf life of fruits and vegetables can be extended.

This works for high respiring fruits such as bananas and avocadoes as the ExtraFresh technology relies on the fruit respiration to create the optimal atmosphere of oxygen (O2), carbon dioxide (CO2), and nitrogen (N2).

Fruits like blueberries and lychees are even more sensitive. Knowing this Hapag-Lloyd has introduced ExtraFresh Plus. ExtraFresh Plus targets high-value, highly perishable but low respiring fruit like blueberries and lychees.

Blueberries are extremely sensitive and require an environment where the atmosphere is controlled and the ripening process is slowed down during the transport.

Much like ExtraFresh, ExtraFresh Plus' goal is to slow the ripening and prevent gray mold and other decay-causing organisms. This allows shippers to ship their produce on longer journeys and enables them to reach new markets that were previously out of range due to the ripening process. ExtraFresh Plus ensures that the shipper delivers a higher quality of fruit to their customer when it arrives.

How ExtraFresh Plus works

To assist the cargo in reaching the optimum atmosphere, an initial gas mixture of carbon dioxide (CO2) and nitrogen (N2) is first injected (flushed) into the container at a Hapag-Lloyd depot after the container is stuffed.

Many technologies currently available in the market rely on fresh air intake of oxygen (O2) to reduce the carbon dioxide (CO2) created from the respiring fruit inside the reefer. As the level of nitrogen (N2) inside the reefer is higher than the outside atmosphere, small amounts of nitrogen (N2) will also escape the container whenever vents open to help bring down the carbon dioxide (CO2) level in the reefer.

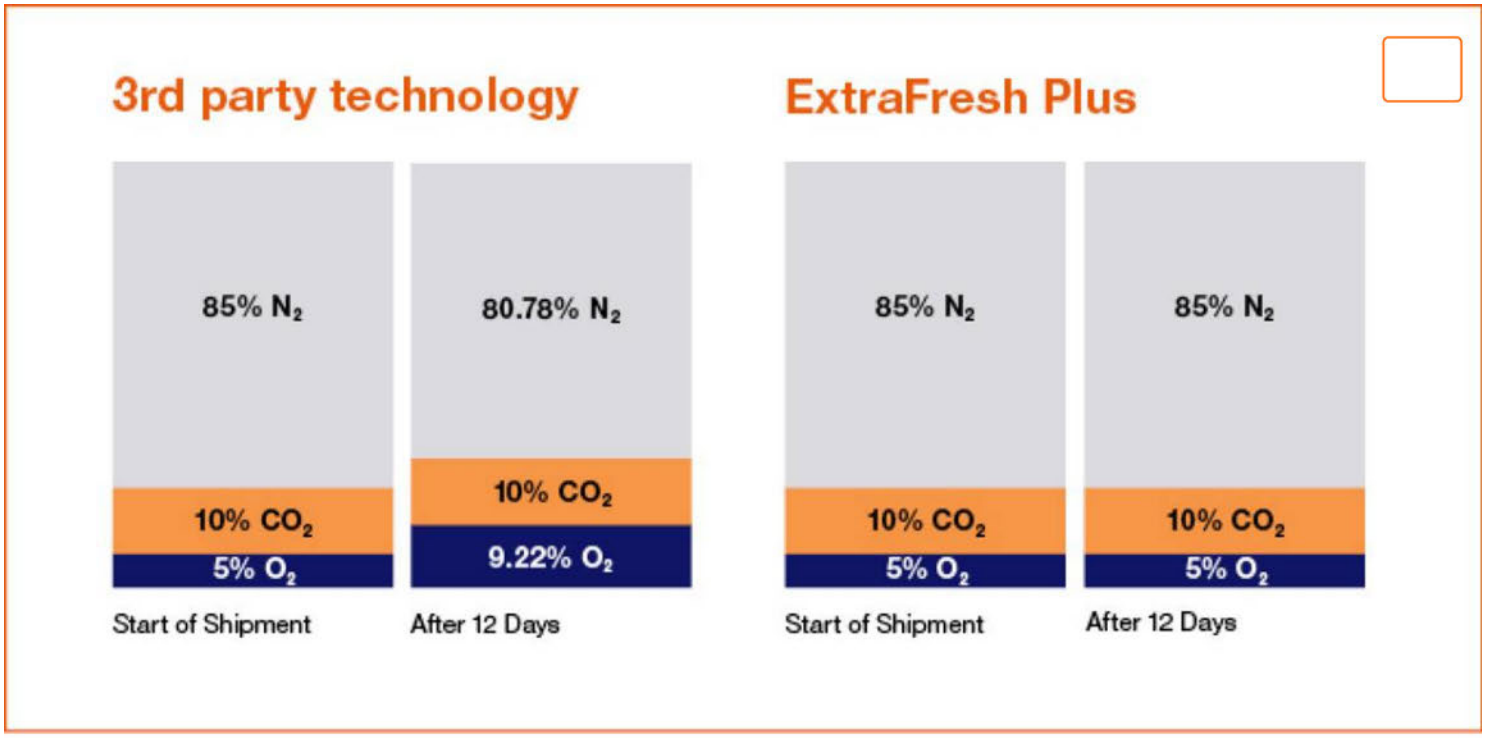
Much like ExtraFresh, ExtraFresh Plus' goal is to slow the ripening and prevent gray mold and other decay-causing organisms.

The only thing going into the reefer is oxygen (O2), which means that oxygen (O2) will replace the escaping nitrogen (N2). As a result, the nitrogen (N2) will inevitably decrease towards the atmospheric level outside of the container. The amount of oxygen (O2) going into the reefer is equal to the amount of nitrogen (N2) escaping from the reefer unit.

Consider the following example:

A container carrying blueberries is initially gassed to 85% nitrogen (N2) and 10% carbon dioxide (CO2) leaving 5% oxygen (O2) inside the container. At a respiration rate of 1% carbon dioxide (CO2) per day, which is not uncommon for blueberries, the oxygen (O2) would increase to over 9% in just 12 days to keep the carbon dioxide (CO2) from rising above the setpoint.

In comparison, ExtraFresh Plus has the capability to filter and remove the carbon dioxide (CO2) from the atmosphere without increasing the oxygen level (O2) or decreasing the level of nitrogen (N2). The system is equipped with both oxygen (O2) and carbon dioxide (CO2) sensors, which actively monitor the levels inside the reefer and ensures the technology maintains the correct levels. Having stable levels of both oxygen (O2) and carbon dioxide (CO2) is the key to providing producers, exporters, importers and buyers with fruit that can travel longer distances while maintaining the optimal quality.



Due to the ExtraFresh Plus technology sensitive fruits maintain the optimal quality even during a long journey.

For fruit exporters, technology such as ExtraFresh Plus keeps fruit in the best possible condition and will extend the shelf life of the product by up to as much as one and half weeks. This provides a win-win situation for the growers, exporters, importers and supermarkets by giving them an extended window where their produce can still be commercially viable.

At the same time, consumers are happy to have fresh fruit on their store shelves no matter the time of year.

EXHIBIT 16

Destination States of California Blueberry Shipments, 2015/16 to 2018/19

Source: California Blueberry Commission Destination Reports. Note: West of Rockies region includes PC, MT, and OW designations.

Destination State	Quantity (lbs)	Season	Region	West of Rockies?
ALABAMA	52950.2	2015-16	SE	No
ALASKA	47919.2	2015-16	OW	Yes
ARIZONA	1766860.9	2015-16	MT	Yes
ARKANSAS	117710.4	2015-16	CS	No
CALIFORNIA	16157728.85	2015-16	PC	Yes
COLORADO	717984.5	2015-16	MT	Yes
CONNECTICUT	379290.6	2015-16	NE	No
DELAWARE	-	2015-16	NE	No
FLORIDA	477006.7	2015-16	SE	No
GEORGIA	159211.4	2015-16	SE	No
HAWAII	227027.9	2015-16	OW	Yes
IDAHO	96134.4	2015-16	MT	Yes
ILLINOIS	1347000.5	2015-16	MW	No
INDIANA	576671.7	2015-16	MW	No
IOWA	243302.25	2015-16	MW	No
KANSAS	132761.2	2015-16	MW	No
KENTUCKY	92550.3	2015-16	SE	No
LOUISIANA	106935	2015-16	CS	No
MAINE	61254.4	2015-16	NE	No
MARYLAND	440326.2	2015-16	SE	No
MASSACHUSETTS	518754.8	2015-16	NE	No
MICHIGAN	418767.6	2015-16	MW	No
MINNESOTA	1450716.2	2015-16	MW	No
MISSISSIPPI	73591.7	2015-16	SE	No
MISSOURI	521097.4	2015-16	MW	No
MONTANA	6658	2015-16	MT	Yes
NEBRASKA	112167.6	2015-16	MW	No
NEVADA	477141.6	2015-16	MT	Yes
NEW HAMPSHIRE	93745.9	2015-16	NE	No
NEW JERSEY	837352.45	2015-16	NE	No
NEW MEXICO	186350.8	2015-16	MT	Yes
NEW YORK	1523512.4	2015-16	NE	No
NORTH CAROLINA	127539.6	2015-16	SE	No
NORTH DAKOTA	13849.1	2015-16	MW	No
OHIO	803168.9	2015-16	MW	No
OKLAHOMA	397582.6	2015-16	CS	No
OREGON	2862584.9	2015-16	PC	Yes
PENNSYLVANIA	1112086.45	2015-16	NE	No
RHODE ISLAND	6970.2	2015-16	NE	No
SOUTH CAROLINA	48158.6	2015-16	SE	No
SOUTH DAKOTA	-	2015-16	MW	No
TENNESSEE	117469.2	2015-16	SE	No
TEXAS	3101171.3	2015-16	CS	No
UTAH	1428975.3	2015-16	MT	Yes
VERMONT	29925.6	2015-16	NE	No

Region Legend	
NE	Northeast
MW	Midwest
SE	Southeast
CS	Central Southwest
MT	Mountains
PC	Pacific Coast
OE	Other - East of Rockies
OW	Other - West of Rockies

Destination State	Quantity (lbs)	Season	Region	West of Rockies?
VIRGINIA	109501.9	2015-16	SE	No
WASHINGTON	2396763	2015-16	PC	Yes
WEST VIRGINIA	577.2	2015-16	SE	No
WISCONSIN	477079	2015-16	MW	No
WYOMING	402398.8	2015-16	MT	Yes
PUERTO RICO	564	2015-16	OE	No
UNKNOWN	3637122	2015-16	UNKNOWN	No
ALABAMA	100484	2016-17	SE	No
ALASKA	21800	2016-17	OW	Yes
ARIZONA	1709576.5	2016-17	MT	Yes
ARKANSAS	129730	2016-17	CS	No
CALIFORNIA	17429809.8	2016-17	PC	Yes
COLORADO	697196.4	2016-17	MT	Yes
CONNECTICUT	629009.4	2016-17	NE	No
DELAWARE	-	2016-17	NE	No
FLORIDA	558777.8	2016-17	SE	No
GEORGIA	219939.3	2016-17	SE	No
HAWAII	234932.4	2016-17	OW	Yes
IDAHO	172092.6	2016-17	MT	Yes
ILLINOIS	1841706.4	2016-17	MW	No
INDIANA	632333.8	2016-17	MW	No
IOWA	236156	2016-17	MW	No
KANSAS	68379	2016-17	MW	No
KENTUCKY	78281.8	2016-17	SE	No
LOUISIANA	90286	2016-17	CS	No
MAINE	138843	2016-17	NE	No
MARYLAND	635527.8	2016-17	SE	No
MASSACHUSETTS	643023.65	2016-17	NE	No
MICHIGAN	936743.92	2016-17	MW	No
MINNESOTA	842544.8	2016-17	MW	No
MISSISSIPPI	29273	2016-17	SE	No
MISSOURI	526995	2016-17	MW	No
MONTANA	7595	2016-17	MT	Yes
NEBRASKA	49814	2016-17	MW	No
NEVADA	349636.8	2016-17	MT	Yes
NEW HAMPSHIRE	59817.6	2016-17	NE	No
NEW JERSEY	333043.2	2016-17	NE	No
NEW MEXICO	83496	2016-17	MT	Yes
NEW YORK	1320075.5	2016-17	NE	No
NORTH CAROLINA	250377.5	2016-17	SE	No
NORTH DAKOTA	2889	2016-17	MW	No
OHIO	456071.5	2016-17	MW	No
OKLAHOMA	410940.4	2016-17	CS	No
OREGON	2400282.95	2016-17	PC	Yes
PENNSYLVANIA	1507938	2016-17	NE	No
RHODE ISLAND	226	2016-17	NE	No
SOUTH CAROLINA	27623	2016-17	SE	No
SOUTH DAKOTA	47	2016-17	MW	No

Destination State	Quantity (lbs)	Season	Region	West of Rockies?
TENNESSEE	18144	2016-17	SE	No
TEXAS	3518891.5	2016-17	CS	No
UTAH	1237397.25	2016-17	MT	Yes
VERMONT	13521.6	2016-17	NE	No
VIRGINIA	28898	2016-17	SE	No
WASHINGTON	5042722.2	2016-17	PC	Yes
WEST VIRGINIA	410	2016-17	SE	No
WISCONSIN	638901.4	2016-17	MW	No
WYOMING	128744	2016-17	MT	Yes
PUERTO RICO	210	2016-17	OE	No
UNKNOWN	4439269	2016-17	UNKNOWN	No
ALABAMA	409609.5	2017-18	SE	No
ALASKA	56494.5	2017-18	OW	Yes
ARIZONA	1493177.2	2017-18	MT	Yes
ARKANSAS	179074.7	2017-18	CS	No
CALIFORNIA	22894971.73	2017-18	PC	Yes
COLORADO	987668.9	2017-18	MT	Yes
CONNECTICUT	774024	2017-18	NE	No
DELAWARE	118.8	2017-18	NE	No
FLORIDA	1412804.8	2017-18	SE	No
GEORGIA	298408.6	2017-18	SE	No
HAWAII	205251.3	2017-18	OW	Yes
IDAHO	184387.3	2017-18	MT	Yes
ILLINOIS	1581698.4	2017-18	MW	No
INDIANA	459933.6	2017-18	MW	No
IOWA	238979.7	2017-18	MW	No
KANSAS	261248	2017-18	MW	No
KENTUCKY	183929	2017-18	SE	No
LOUISIANA	119026	2017-18	CS	No
MAINE	51163	2017-18	NE	No
MARYLAND	751735.9	2017-18	SE	No
MASSACHUSETTS	274329.1	2017-18	NE	No
MICHIGAN	780046.8	2017-18	MW	No
MINNESOTA	1136090.3	2017-18	MW	No
MISSISSIPPI	136326.4	2017-18	SE	No
MISSOURI	594676.8	2017-18	MW	No
MONTANA	11639	2017-18	MT	Yes
NEBRASKA	34952.5	2017-18	MW	No
NEVADA	103683.7	2017-18	MT	Yes
NEW HAMPSHIRE	50217	2017-18	NE	No
NEW JERSEY	618487.65	2017-18	NE	No
NEW MEXICO	70323.5	2017-18	MT	Yes
NEW YORK	1289131.4	2017-18	NE	No
NORTH CAROLINA	308566.2	2017-18	SE	No
NORTH DAKOTA	5364	2017-18	MW	No
OHIO	598459.8	2017-18	MW	No
OKLAHOMA	346870.7	2017-18	CS	No
OREGON	3136371.12	2017-18	PC	Yes

Destination State	Quantity (lbs)	Season	Region	West of Rockies?
PENNSYLVANIA	1294850.6	2017-18	NE	No
RHODE ISLAND	13566	2017-18	NE	No
SOUTH CAROLINA	42609.7	2017-18	SE	No
SOUTH DAKOTA	-	2017-18	MW	No
TENNESSEE	164197	2017-18	SE	No
TEXAS	2619940.4	2017-18	CS	No
UTAH	870051.1	2017-18	MT	Yes
VERMONT	42668.25	2017-18	NE	No
VIRGINIA	148984.9	2017-18	SE	No
WASHINGTON	4300988.4	2017-18	PC	Yes
WEST VIRGINIA	452.1	2017-18	SE	No
WISCONSIN	330346.2	2017-18	MW	No
WYOMING	632453.7	2017-18	MT	Yes
PUERTO RICO	8347.5	2017-18	OE	No
UNKNOWN	-	2017-18	UNKNOWN	No
ALABAMA	15184.3	2018-19	SE	No
ALASKA	19380.6	2018-19	OW	Yes
ARIZONA	2147811.27	2018-19	MT	Yes
ARKANSAS	36535.5	2018-19	CS	No
CALIFORNIA	25359166.66	2018-19	PC	Yes
COLORADO	1149884.11	2018-19	MT	Yes
CONNECTICUT	1117376.95	2018-19	NE	No
DELAWARE	-	2018-19	NE	No
FLORIDA	925333.52	2018-19	SE	No
GEORGIA	453916.52	2018-19	SE	No
HAWAII	237117.82	2018-19	OW	Yes
IDAHO	153963.33	2018-19	MT	Yes
ILLINOIS	2501077.62	2018-19	MW	No
INDIANA	486767.43	2018-19	MW	No
IOWA	383128	2018-19	MW	No
KANSAS	323469.1	2018-19	MW	No
KENTUCKY	164639	2018-19	SE	No
LOUISIANA	57110.9	2018-19	CS	No
MAINE	186429.5	2018-19	NE	No
MARYLAND	772301.55	2018-19	SE	No
MASSACHUSETTS	80491.58	2018-19	NE	No
MICHIGAN	640641.2	2018-19	MW	No
MINNESOTA	672740.72	2018-19	MW	No
MISSISSIPPI	13001	2018-19	SE	No
MISSOURI	835569.73	2018-19	MW	No
MONTANA	13218.5	2018-19	MT	Yes
NEBRASKA	243952	2018-19	MW	No
NEVADA	70590.61	2018-19	MT	Yes
NEW HAMPSHIRE	63720	2018-19	NE	No
NEW JERSEY	579909.5	2018-19	NE	No
NEW MEXICO	157542	2018-19	MT	Yes
NEW YORK	1361504.7	2018-19	NE	No
NORTH CAROLINA	4212	2018-19	SE	No

Destination State	Quantity (lbs)	Season	Region	West of Rockies?
NORTH DAKOTA	414332.67	2018-19	MW	No
OHIO	660126.26	2018-19	MW	No
OKLAHOMA	370318.4	2018-19	CS	No
OREGON	2719906.25	2018-19	PC	Yes
PENNSYLVANIA	968134.85	2018-19	NE	No
RHODE ISLAND	-	2018-19	NE	No
SOUTH CAROLINA	6712	2018-19	SE	No
SOUTH DAKOTA	99	2018-19	MW	No
TENNESSEE	96821.9	2018-19	SE	No
TEXAS	3362641.57	2018-19	CS	No
UTAH	1076254.71	2018-19	MT	Yes
VERMONT	33196	2018-19	NE	No
VIRGINIA	227571.95	2018-19	SE	No
WASHINGTON	4838289.84	2018-19	PC	Yes
WEST VIRGINIA	135	2018-19	SE	No
WISCONSIN	324030.83	2018-19	MW	No
WYOMING	229886.96	2018-19	MT	Yes
PUERTO RICO	-	2018-19	OE	No
UNKNOWN	-	2018-19	UNKNOWN	No

Exhibit 17

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

Exhibit 18

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

Exhibit 19

Weighted Average Unit Values of Frozen Blueberries

Source: Staff Report Tables V-20-23. Reflects weighted average of the four frozen pricing products.

Quarter	2015	2016	2017	2018	2019	*% Change* 2015-2019
1	[					]
2	[					]
3	[					]
4	[					]

Quarterly Pricing Product Correlations

Source: Staff Report Tables V-16,17,21,23. Fresh prices reflect the simple average of months within a quarter. (Volumes are not available by pricing product.) Each product is conventional (i.e., not organic), which account for the large majority of volume within both fresh and frozen types. (Fresh volumes are not available in the pricing product data, however the Agronometrics Movement dataset attached to this submission demonstrate that U.S. conventional volumes are significantly larger than organic volumes.)

	Fresh Cultivated 6-oz cups	***Fresh Cultivated 12 1-pt cups***		***Frozen Cultivated***	***Frozen Wild***
	Product 1	**Product 2**		**Product 6**	**Product 8**
	$ per 12 6-oz cups	*$ per 12 1-pt cups*		*$/pound*	*$/pound*
2015q1	$30.29		[		]
2015q2	$13.67	$21.15	[		]
2015q3	$16.95	$22.65	[		]
2015q4	$30.00		[		]
2016q1			[		]
2016q2	$18.68	$21.16	[		]
2016q3	$16.76	$22.13	[		]
2016q4			[		]
2017q1	$30.20		[		]
2017q2	$18.24	$26.67	[		]
2017q3	$14.67	$21.78	[		]
2017q4	$24.00		[		]
2018q1	$27.25	$49.50	[		]
2018q2	$17.52	$28.37	[		]
2018q3	$13.23	$18.65	[		]
2018q4			[		]
2019q1	$24.45	$46.67	[		]
2019q2	$14.38	$21.59	[		]
2019q3	$12.24	$17.50	[		]
2019q4			[		]
2020q1	$23.75	$45.33	[		]
2020q2	$12.44	$20.75	[		]
2020q3	$13.21	$19.02	[		]

Correlation Table

Relationship	Coefficient	Obs	t stat	p-value	Statistically Significant at 95% Confidence?	Statistically Significant at 99% Confidence?
Fresh Cultivated (Product 1) & Frozen Cultivated (Product 6)	***0.7020***	19	4.06	0.001	Yes	Yes
Fresh Cultivated (Product 2) & Frozen Cultivated (Product 6)	***0.6073***	15	2.76	0.016	Yes	No
Frozen Cultivated (Product 6) & Frozen Wild (Product 8)	***0.2089***	23	0.98	0.339	No	No

Exhibit 20

U.S. Producer Prices for Fresh Blueberries, by Month over the POI

Source: Prehearing Report Tables V-16-19 (based on AMS Shipping Point data)

	Prices ($/package)						*Changes ($/package)*		*% Changes*	
	2015	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**	**2015-2019**	**2015-2020**
Product 1 - Fresh conventional flats in 12 6-oz cups with lids										
March	30.29		30.2	27.25	24.45	23.75	-$5.84	-$6.54	-19.3%	-21.6%
April	17.72	31	22.17	19.25	16.71	12.31	-$1.01	-$5.41	-5.7%	-30.5%
May	12.96	13.87	17.54	20.12	12.19	12.23	-$0.77	-$0.73	-5.9%	-5.6%
June	10.32	11.17	15	13.19	14.24	12.78	$3.92	$2.46	38.0%	23.8%
July	10.25	11.13	12.69	10.38	11.34	12.14	$1.09	$1.89	10.6%	18.4%
August	15.89	15.96	13.6	13	11.86	10.5	-$4.03	-$5.39	-25.4%	-33.9%
September	24.7	23.2	17.73	16.32	13.51	17	-$11.19	-$7.70	-45.3%	-31.2%
October	30		24							
						Average:	*-$2.55*	*-$3.06*	*-7.6%*	*-11.5%*
Product 2 - Fresh conventional flats, 12 1-pt cups with lids										
March				49.5	46.67	45.33				
April	28.65	28.75	32.31	34.28	27.57	20.24	-$1.08	-$8.41	-3.8%	-29.4%
May	21.32	19.45	26.94	31.03	17.88	21.42	-$3.44	$0.10	-16.1%	0.5%
June	13.47	15.29	20.77	19.8	19.31	20.6	$5.84	$7.13	43.4%	52.9%
July	13.84	13.97	18.08	14.48	15.57	19.48	$1.73	$5.64	12.5%	40.8%
August	23.69	23.07	20.01	19.1	16.68	16.33	-$7.01	-$7.36	-29.6%	-31.1%
September	30.42	29.35	27.25	22.38	20.24	21.25	-$10.18	-$9.17	-33.5%	-30.1%
October										
						Average:	*-$2.36*	*-$2.01*	*-4.5%*	*0.6%*
Product 3 - Fresh organic flats in 12 6-oz cups with lids										
March			38		34.35	33.33				
April	29.19		35.35	24.5	28.67	21.5	-$0.52	-$7.69	-1.8%	-26.3%
May	23.26	23.48	25.96	24.13	17.25	16.02	-$6.01	-$7.24	-25.8%	-31.1%
June	20.7	19.12	21.7	19.25	18.17	15.5	-$2.53	-$5.20	-12.2%	-25.1%
July	22	17.45		14.03	17.34	19.36	-$4.66	-$2.64	-21.2%	-12.0%
August	29.79	26.7	22.4	24.62	18.62	18.83	-$11.17	-$10.96	-37.5%	-36.8%
September		38.33	23	26.65	25.94	24.26				
October										
						Average:	*-$4.98*	*-$6.75*	*-19.7%*	*-26.3%*
Product 4 - Fresh organic flats, 12 1-pt cups with lids										
March										
April						28				
May					25.94	25.83				
June	28.02	24.14		24.67	28.86	26	$0.84	-$2.02	3.0%	-7.2%
July	28.27	26.6	28	19.45	26.29	28.19	-$1.98	-$0.08	-7.0%	-0.3%
August		31.3	28.5	29.41	26.78	27.96				
September						32.73				
October										
						Average:	*-$0.57*	*-$1.05*	*-2.0%*	*-3.7%*

U.S. Producer Prices for Frozen Blueberries, by Quarter over the POI

Source: Prehearing Report Tables V-20-23 (based on Questionnaire responses).

	Prices ($/pound)						*Changes ($/pound)*		*% Changes*	
	2015	**2016**	**2017**	**2018**	**2019**	**2020**	**2015-2019**	**2015-2020**	**2015-2019**	**2015-2020**
Product 5										
Q1	[									]
Q2	[									]
Q3	[									]
Q4	[									]
Average:						[				]
Product 6										
Q1	[									]
Q2	[									]
Q3	[									]
Q4	[									]
Average:						[				]
Product 7										
Q1	[									]
Q2	[									]
Q3	[									]
Q4	[									]
Average:						[				]
Product 8										
Q1	[									]
Q2	[									]
Q3	[									]
Q4	[									]
Average:						[				]

EXHIBIT 21

Portman Urges International Trade Commission to Protect Ohio Steelworkers

May 24, 2016 | Press Releases

Washington, D.C. – In testimony before the International Trade Commission (ITC) today, U.S. Senator Rob Portman (R-Ohio) urged the agency to use the tools that Congress provided them in the *Leveling the Playing Field Act* to protect Ohio steelworkers from countries like China, Brazil, India, Japan, Republic of Korea, Netherlands, Russia, and the United Kingdom that continue to flood the U.S. market with unfair steel imports. Portman testified on behalf of several steel companies with Ohio locations – including U.S. Steel Corporation, AK Steel Corporation, Nucor, and ArcelorMittal – who are concerned about unfair trade practices undercutting their businesses and costing jobs.

"The American steel industry is facing a crisis," **said Portman in his testimony.** *"We produce the best steel in the world, with the most productive workforce, and yet, last year, more than 12,000 steelworkers around the country were laid off. Nearly 1,500 of those were in Ohio. These layoffs are devastating on the families of these hardworking steelworkers and the communities where they live."*

Portman's top priority in the Senate has been boosting Ohio jobs and the economy. Portman, who has been awarded the "Congressional Steel Champion Award" for his work to protect the steel industry and Ohio steelworkers, has a long record of working to protect Ohio steelworkers from foreign cheating and delivering results to keep good jobs in Ohio.

Portman's testimony can be found below:

Testimony of Senator Rob Portman before the International Trade Commission

Certain Cold-Rolled Steel Flat Products from Brazil, the People's Republic of China, India, Japan, the Republic of Korea, Russia, and the United Kingdom

May 24, 2016

Madam Chairman and Members of the Commission, thank you for the opportunity to speak here today on behalf of Ohio steelworkers producing cold-rolled steel, corrosion-resistant steel, and hot-rolled steel.

Your ongoing investigations are of critical importance to Ohio and to the American economy because the American steel industry is facing a crisis. We produce the best steel in the world, with the most productive workforce, and yet, last year, more than 12,000 steelworkers around the country were laid off. Nearly 1,500 of those were in Ohio.

These layoffs are devastating on the families of these hardworking steelworkers and the communities where they live. Take, for example, the community of Lorain, Ohio. Lorain is home to both Republic and U.S. Steel. In the last year, the companies have been forced to lay off about 1,200 steelworkers in Lorain. Brian Sealy, a former employee at Republic who now works for the USW calls this the "darkest" period that Lorain has ever seen. He points out that the effects of the layoffs are felt beyond the workers themselves. "You're going to have 1,200 people out of work. That's devastation for the community . . . . It's going to affect the busing system on down the line because people aren't going to be going anywhere."

It's hard enough for working class families today experiencing the "middle class squeeze." They can't afford these unfair job losses at a time when wages are stagnating or even declining and the cost of living, including healthcare expenses, is going up.

The major reason layoffs are happening is because the U.S. market is being flooded with unfair imports. Take, for example, just the steel at issue in these three cases: from 2013 to 2015, U.S. imports of cold rolled steel increased by more than 110 percent, imports of hot-rolled steel doubled, and imports of corrosion-resistant steel increased by 75 percent. That was just in two years.

And these increases continue. Last year, China exported a record-high 112 million tons of steel. This year, despite China's assurances that production would be cut, its biggest listed steelmaker plans to increase output by 20 percent.

I am confident that when you review the record in each of these cases, you will find that domestic producers have suffered material injury by reason of unfair trade. Unfairly-traded imports not only prevented domestic producers from taking full advantage of stronger demand conditions in 2014, but contributed to a dramatic decline in prices in 2015. The results have been disastrous. Last year, for example, U.S. producers of cold-rolled steel suffered a net loss of $162.4 million. U.S. producers of corrosion-resistant steel suffered a net loss of $77.6 million.

Rather than repeat the good arguments made by petitioners about why there is material injury in these particular cases, however, I would like to talk about the role of this Commission in U.S. trade policy, and to explain why those of us in Congress recently clarified and improved the material injury standard that you will be applying in all three of these steel cases.

In the world of trade litigation, justice delayed is justice denied. Trade relief can be effective, and we are already seeing signs that following the Commerce Department's preliminary determination the cases before you are making a difference for U.S. mills. But trade relief cannot bring back the profits that were already lost due to unfair trade. It cannot bring back the income workers lose when they are laid off, or the costs companies must pay when idling a plant. It cannot make up for the investments companies are unable to make, or the products they cannot develop, while waiting for relief to occur. And often trade relief cannot bring back the jobs that are lost.

Last October, Blake Arnott from Bidwell, Ohio wrote to me worrying about potential layoffs at the AK Steel plant across the river in Ashland, Kentucky. Unfortunately, his concerns turned out to be well-founded. In December, 620 workers were laid off. Around the same time, I received a letter from Jeff Massie from Kitts Hill, Ohio, who also worked at the AK Steel Ashland facility. While Jeff has been fortunate enough to keep his job for the time being, he says he goes to work every day wondering if he will have a job at the end of it. He wondered how the government could sit back and watch as illegal dumping destroyed an entire industry – an entire community. And his concerns aren't unfounded: in Jeff's neighborhood alone, five people have already lost their homes as a result of the steel crisis. These stories show why it is critical that when unfairly-traded imports are hurting a domestic industry, our producers must be able to obtain relief quickly.

For this reason, U.S. law has long defined "material injury" as "harm which is not inconsequential, immaterial, or unimportant." That's it. That's all that a domestic industry has to show. If an industry has suffered harm which is not inconsequential, immaterial, or unimportant – or if it is threatened with such harm – and this harm (or threat of harm) is by reason of imports, then the industry is entitled to relief.

In recent years, however, many of my colleagues and I have heard from our constituents – including constituents in the steel industry – that they hesitated to use the trade laws until they were severely injured. Some worried about bringing trade cases during a period of rising demand. This hesitancy only allows for material injury to continue, and undermines the effectiveness of our trade laws.

That's why last year, as part of the Trade Preferences Extension Act of 2015, Congress acted to clarify the material injury standard by passing the *Leveling the Playing Field Act*. I, along with Senator Sherrod Brown, led this effort, and worked with our colleagues to pass this measure on the Senate

floor and get it to the President for his signature. Our *Leveling the Playing Field Act* was meant to help ensure that domestic producers can get relief faster: they don't have to wait until plants are shuttered and workers are laid off to get relief.

I now urge the Commission to pay close attention to two provisions in that statute. First, we made clear that the Commission may not determine that there is no material injury or threat of material injury to a domestic industry merely because that industry is profitable or because the performance of that industry has recently improved. There may be many cases – particularly in periods of strong demand – where a domestic industry remains somewhat profitable, even though its profitability is diminished by the harmful impact of unfair trade. This new provision makes clear what was, in my view, already present in the law: that domestic producers do not have to wait until they are losing money and jobs and market share to seek, and obtain, trade relief.

We also made clear that the Commission should consider a broad set of economic data that reflects the real-life performance of the domestic industry, such as the industry's net profits, its ability to service debt, and its investment in new technologies and R&D. Sometimes unfair trade may drive down an industry's operating income. In other cases, the industry's operating income may remain stable, while other aspects of its performance, such as its net income or its ability to pay its debt, may suffer. The intent of Congress was that the Commission should be sensitive to the effects of unfair trade wherever they are found.

I know this Commission to be a diligent and thoughtful body that has been given a great responsibility by Congress: the responsibility to enforce our AD and CVD laws in a manner that will lead to better and fairer market competition. In fulfilling that responsibility, I urge you to pay close attention to our recent clarification of the injury standard, and to ensure that our laws are strictly enforced. Otherwise, we risk encouraging further market-distorting practices by foreign competitors.

Madam Chairman, our steelworkers are producing the highest quality product anywhere, more efficiently than ever. And they have worked with management and made concessions to be competitive. They are doing their part; we must do our part and protect them from the unfair and dishonest foreign competition that threatens their livelihoods and communities all across Ohio. I've been to these steel mills and have met with the steelworkers whose jobs are affected. If you give them a level playing field, they will be just fine. So I urge the Commission today to use the tools that we gave you in the *Leveling the Playing Field Act* and recognize that material injury has in fact been suffered by the petitioners in these three cases. Thank you.

###

EXHIBIT 22

CALIFORNIA Blueberry COMMISSION

DECLARATION OF TODD SANDERS

1. My name is Todd Sanders. I am Executive Director of the California Blueberry Commission. Our membership includes 82 blueberry growers and is established pursuant to California Food and Agricultural Code sections 79201 et seq.

2. The California Blueberry Commission supports the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers.

3. We have provided funding and other support and have used our best efforts to encourage all of our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that a number of our growers have been unable to respond due to the complexity of the questionnaire and/or the needs and demands of their operations and have instead relied upon the Commission to provide their representation.

4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

JAN 15, 2021
Date

Todd Sanders, Executive Director
California Blueberry Commission

2565 Alluvial Avenue, Suite 152 • Clovis, CA 93611 • (559) 221-1800 Tel. • (559) 456-9099 Fax
www.calblueberry.org

DECLARATION OF Brittany H. Lee

1. My name is Brittany Lee. I am the Executive Director of the Florida Blueberry Growers Association. Our membership includes 210 blueberry growers and is a non-profit association incorporated under the laws of the State of Florida.

2. The Florida Blueberry Growers Association supports the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers.

3. We have provided funding and other support and have used our best efforts to encourage all of our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that a number of our growers have been unable to respond due to the complexity of the questionnaire and/or have been unwilling to respond due to concerns about potential retaliation by their marketers.

4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

1-15-2021

(Date)

Brittany H. Lee

The Florida Blueberry Growers Association

DECLARATION OF

Georgia Blueberry Commodity Commission

1. My name is C. Jerome Crosby. I am Chairman of the Georgia Blueberry Commodity Commission. Our entity represents all Georgia blueberry farmers and is established under a marketing order of the laws of the State of Georgia to self-assess all blueberry farmers in Georgia for the benefit of the Georgia Blueberry industry.

2. The Georgia Blueberry Commodity Commission supports the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers.

3. We have provided funding and other support and have used our best efforts to encourage all of our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that a number of our growers have been unable to respond due to the complexity of the questionnaire and/or have been unwilling to respond due to concerns about potential retaliation by their marketers.}

4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

1-15-21

(Date)

C. Jerome Crosby

C. Jerome Crosby, Chairman
Georgia Blueberry Commodity Commission

37992269

DECLARATION OF GEORGIA BERRY EXCHANGE

1. My name is Michael Railey. I am serving as Chairman/President of the Georgia Berry Exchange. Our membership includes 110 blueberry growers and is private corporation, established under laws of the State of Georgia.

2. The Georgia Berry Exchange supports the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers.

3. We have provided support and have used our best efforts to encourage all our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that many our growers have been unable to respond due to the complexity of the questionnaire and/or have been unwilling to respond due to concerns about potential retaliation by their marketers.}

4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

Jan. 15, 2021
(Date)

Michael Railey
Georgia Berry Exchange

DECLARATION OF
REX L. SCHULTZ, PRESIDENT, MICHIGAN BLUEBERRY ADVISORY COMMITTEE

1. My name is Rex L. Schultz. I am the president of the Michigan Blueberry Advisory Committee. We represent all 541 blueberry growers of the State of Michigan and are a 501(c)(3) organization established under the laws of the State of Michigan.
2. The Michigan Blueberry Advisory Committee supports the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers.
3. We have provided funding and other support and have used our best efforts to encourage all of our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that a number of our growers have been unable to respond due to the complexity of the questionnaire and/or have been unwilling to respond due to concerns about potential retaliation by their marketers.
4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

Signed: Rex L. Schultz, President, MBBAC

1/14/2021
01/14/2021

Declared and signed before me on this 14th of January 2021 in Van Buren County, Michigan.

Jennifer Spears

JENNIFER SPEARS
Acting in Van Buren County

My Commission Expires: 02/15/2021

JENNIFER SPEARS
NOTARY PUBLIC
State of Michigan
County of Van Buren
My Commission Expires 02/15/2021

DECLARATION OF

the Oregon Blueberry Commission

1. My name is Bryan Ostlund. I am the Administrator of the Oregon Blueberry Commission. Our membership includes more than 360 growers and is an agency of the State of Oregon, established under Oregon Statute ORS 576.

2. The Oregon Blueberry Commission is formally on record as being in support of the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers.

3. We have dedicated funding and other support and have used our best efforts to encourage all of our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that a number of our growers have been unable to respond due to the complexity and size of the questionnaire and/or have been unwilling to respond due to concerns about potential retaliation by their marketers.

4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

January 14, 2021

Bryan Ostlund
Oregon Blueberry Commission

37992269

DECLARATION OF Alan Schreiber

1. My name is Alan Schreiber. I am Executive Director of the Washington Blueberry Commission. Our membership includes approximately 225 and is the legal entity in the state of Washington that represents the interests of blueberry growers in this state.

2. The Washington Blueberry Commission supports the ongoing Section 201 investigation on imports of blueberries and supports the imposition of relief to remedy the serious injury caused to our growers. This position was based on a survey of Washington blueberry growers who expressed support for this action in overwhelming numbers.

3. We have authorized funding and other support and have used our best efforts to encourage all of our growers to respond to the U.S. International Trade Commission's questionnaires. We are aware that a number of our growers have been unable to respond due to the complexity of the questionnaire and/or have been unwilling to respond due to concerns about potential repercussions by their marketers.

4. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

_____

Alan Schreiber

Washington Blueberry Commission

January 14, 2020

EXHIBIT 23

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

EXHIBIT 24

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

EXHIBIT 25

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

Exhibit 26

Economic Research Service
United States Department of Agriculture

Documentation for the Farm Sector Financial Ratios

Documentation for the Farm Sector Financial Ratios

The Economic Research Service's Farm Sector Financial Ratios report includes a series of financial ratios designed to measure the financial standing of the agricultural sector. Consistent with the Farm Income and Wealth Statistics data product, ratios are calculated using aggregated sector level data. (We use aggregate sector-level data rather than reporting summary statistics for farm-level data. For a discussion of the differences, see Ahrendsen and Katchova, 2012.) The ratios can be used to conduct financial analysis of the agricultural sector in order to examine the sector's present financial position and the sector's financial performance over time. Financial *position* refers to the sector's financial standing at a given point in time and compares asset, debt, and equity values. In contrast, financial *performance* refers to how well the sector utilized its assets during a given time period. Financial performance measures include data from the income statement and balance sheet. Since solvency ratios only include data from the balance sheet, they are measures of the sector's financial position at a point in time. The efficiency, liquidity, and profitability ratios are used to analyze the sector's financial performance for a calendar year.

In order to report financial ratio statistics consistent with those commonly used in the financial profession, ERS' Selected Financial Ratios report uses Farm Financial Standards Council (FFSC) financial ratio definitions unless otherwise noted. The FFSC report includes recommendations on "Universal Financial Criteria and Measures," which covers the estimation and use of financial ratios for agribusiness. The FFSC standards outline definitions, formulas, interpretations, and limitations of many widely used financial measures. By following industry standards, the sector financial ratio calculations can be used for both historical analyses at the sector level, and as a benchmark for comparing farm businesses to the sector, where applicable.

The financial ratios reported by ERS are calculated using data from the balance sheet of the agricultural sector and the farm sector's income statement. For further information on the sources and methodology used to create these data, please see the Farm Income and Wealth Statistics general documentation and documentation for the farm sector balance sheet.

This documentation below includes the estimation methodology used and background information on the financial ratios calculated as part of the Financial Ratios report. There are four main sections corresponding to the primary groups of financial ratios recommended by the FFSC and reported by the Farm Financial Ratios report—Efficiency Ratios, Liquidity Ratios, Profitability Ratios, and Solvency Ratios. Each section provides a brief overview of the aspect of farm sector financial position and/or performance being measured, the specific methodology and data used, and any limitations in interpreting the resulting financial ratios.

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Efficiency Ratios

Farm sector efficiency ratios provide information on how efficiently the sector uses its assets to create revenue. As a result, the ratios can be used to gauge the performance of sector production, marketing, and financing activities.

The sector's gross revenues are either used to cover expenses or realized as net income. Therefore, the operating expense ratio, net farm income ratio, interest expense ratio, and capital consumption ratio sum to one. As a result, the four ratios provide a complementary picture of the sector's efficiency: increases in one ratio are mirrored by decreases in the others.

Data used to calculate the efficiency ratios are reported as part of ERS's Farm Income and Wealth Statistics data product, see each ratio for the particular variables used in calculations. For further information on the sources and methodology used to estimate the Farm Income and Wealth Statistics data, please see the general documentation.

Asset Turnover Ratio

The asset turnover ratio measures the efficiency with which farm assets are used to generate production. According to the FFSC guidelines, numerator is gross revenues. However, their definition of gross revenues matches the value of production calculation in the farm income and wealth statistics data product. Because asset values reported on the balance sheet are estimated as of December 31st each year, the average of the total assets from the start and end of the year are used to represent the average value of assets available to support production during the year in this ratio. This is represented by the denominator ($Assets_t + Assets_{t-1}/2$). Higher ratios signify the sector's assets are being used to generate production more efficiently.

The operating profit margin ratio, asset turnover ratio and rate of return on farm assets from income provide complimentary information on farm sector efficiency and profitability. The farm sector can increase its profits in two primary ways: increasing its production or increasing its per unit profit margin. As a result, the following formula holds: *Asset turnover ratio$_t$ * Operating profit margin ratio$_t$ = Rate of return on assets from income$_t$.*

Asset Turnover Ratio Formula

$$Asset\ turnover\ ratio_t = \frac{Value\ of\ production_t}{\frac{Assets_t + Assets_{t-1}}{2}}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Value of production data are reported in the value added by U.S. agriculture report. Farm sector asset levels are reported as part of the farm sector balance sheet report.

Operating Expense Ratio

The operating expense ratio measures the amount of cash the farm sector spends to generate a dollar of production. According to the FFSC guidelines, the denominator is gross revenues. However, its definition of gross revenues matches the value of production calculation in the farm income and wealth statistics data product. Therefore, the ratio can be thought of as the proportion of production required to cover operating expenses. Higher values indicate a greater proportion of production is required to cover operating expenses, signifying less efficiency in converting production to profits. Values less than one indicate production exceeds cash expenses.

Operating Expense Ratio Formula

$$Operating\ expense\ ratio_t =$$

$$\frac{Total\ production\ expenses_t - Interest\ expense_t - Capital\ consumption_t}{Value\ of\ production_t}$$

$Value\ of\ production_t$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Total production expenses (excluding operator dwelling), interest expense, and capital consumption are reported as part of production expenses by category. Value of production data are reported in the value added by U.S. agriculture report. Farm sector asset levels are reported as part of the farm sector balance sheet report.

Net Farm Income Ratio

The net farm income ratio measures the amount of net farm income generated per dollar of production in the farm sector. Alternatively, it shows the proportion of production remaining after accounting for expenses. A value of one would signify all production was realized as net income or equivalently, no expenses were incurred. Larger values signify increased sector efficiency in converting production to net farm income.

Net Farm Income Ratio Formula

$$Net\ farm\ income\ ratio_t = \frac{Net\ farm\ income_t}{Value\ of\ production_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Net farm income and value of production are reported as part of the value added by U.S. agriculture report.

Interest Expense Ratio

The interest expense ratio measures the proportion of production used to make interest payments on debt. Higher levels of the ratio suggest a higher interest payment burden relative to production.

Interest Expense Ratio Formula

$$Interest\ expense\ ratio_t = \frac{Interest\ expense_t}{Value\ of\ production_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Both interest expenses and value of production data are reported as part of the value added by U.S. agriculture report.

Capital Consumption Ratio

Farm income and wealth statistics reports capital consumption instead of depreciation allowed in the tax code. For this reason, capital consumption is used rather than depreciation as is recommended in the FFSC guidelines. Capital consumption represents the amount of farm sector capital used up in the production process or damaged in a given year. Capital consumption is estimated separately for automobiles, trucks, tractors, farm machinery, farm service buildings, and operator dwellings. These components are aggregated to sector capital consumption. Therefore, the capital consumption ratio measures the proportion of production needed to cover the sector's capital consumption.

Capital Consumption Ratio Formula

$$Capital\ consumption\ ratio_t = \frac{Capital\ consumption_t}{Value\ of\ production_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Capital consumption and value of production data are reported as part of the value added by U.S. agriculture report.

Liquidity Ratios

In finance, the term liquidity has two related meanings. Liquidity is often used to refer to the ease with which an asset can be converted into cash. Liquidity is also used to refer to the amount of capital readily available as cash. Each of the reported liquidity ratios provides a way to assess the farm sector's ability to make scheduled financial payments as they come due.

Each data series used in the liquidity ratios, excluding debt principal payments, is reported as part of ERS's Farm Income and Wealth Statistics data product. Where debt principal payments are used, a description is provided. For further information on the sources and methodology used to estimate the Farm Income and Wealth Statistics data please see the general documentation.

Current Ratio

The current ratio measures the ability of current assets, if sold and converted to cash, to cover current debt obligations. A higher current ratio indicates greater liquidity.

Current Ratio Formula

$$Current\ ratio_t = \frac{Current\ assets_t}{Current\ debt_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Current assets and current debt (excluding operator dwellings) are reported as part of the current and noncurrent farm sector balance sheet report.

Working Capital

Working capital measures the amount cash that would be available to fund operating expenses after paying off current debt. Working capital is similar to the current ratio in that it measures the capacity for current assets to fund current liabilities.

Working Capital Formula

$$Working\ capital_t = Current\ assets_t - Current\ debt_t$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Value of production and interest expenses are reported as part of the value added by U.S. agriculture report. Farm sector asset levels are reported as part of the farm sector balance sheet report.

Working Capital To Gross Revenues Ratio

The working capital to gross revenues ratio measures the working capital relative to the size of the farm sector.

Working Capital To Gross Revenues Ratio Formula

$$Working\ capital\ to\ gross\ revenues\ ratio_t = \frac{Working\ capital_t}{Value\ of\ production_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Value of production data are reported in the value added by U.S. agriculture report. Farm sector asset levels are reported as part of the farm sector balance sheet report.

Debt Service Ratio

Debt servicing ratio describes the share of production used for debt payments. Higher debt servicing ratios implies a greater share of production is needed to make debt payments, implying less liquidity.

Debt Service Ratio Formula

$$Debt\ service\ ratio_t = \frac{Interest\ expense_t + Principal\ payments_t}{Value\ of\ production_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Value of production and interest expenses are reported as part of the value added by U.S. agriculture report. Real and nonreal estate debt figures used in the principal payments calculations are reported as part of the farm sector balance sheet report. Principal payments data are not publicly reported, but are calculated as follows:

Principal payments calculation:

$$Real\ estate\ debt_t * \frac{Principal\ payments_{RE}}{Debt_{RE}} + Nonreal\ estate\ debt_t * \frac{Principal\ payments_{NR}}{Debt_{NR}}$$

The present value of an annuity calculation is used to calculate principal payments.

$$Principal\ payments_j = \frac{Debt_j}{\left[\frac{1-(1+i_j)^{-nj}}{i_j}\right]},$$

$$where\ j = RE\ or\ NR\ and\ i_{j,t} = \frac{Interest\ expense_{j,t}}{\frac{Debt_{j,t} + Debt_{j,t-1}}{2}}$$

All loans are assumed to be halfway through the term. Payments are assumed to be made monthly at the end of the month. Average loan assumptions for real estate (RE) is 30 years, 5 years for nonreal estate (NR).

Times Interest Earned

Times interest earned is another measure of ability to cover debt payments, specifically interest payments. A value less than 1 implies there is not enough cash from operations to meet interest payments. Therefore, borrowing or drawing down assets must occur to make interest payments. Higher times interest earned indicates greater ease in making debt payments.

Times Interest Earned Formula

$$Times\ interest\ earned_t = \frac{Net\ farm\ income_t + Interest\ expense_t}{Interest\ expense_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth

Statistics data product. Net farm income and interest expense data are part of the value added by U.S. agriculture report

Profitability Ratios

Profitability refers to the sector's ability to generate returns from production inputs. Accordingly, profitability ratios measure the farm sector's return relative to resources used. Returns to farming are realized through operations (income) or growth in the value of total farm assets (capital gains) for the sector.

Data used to calculate the profitability ratios are reported as part of ERS's Farm Income and Wealth Statistics data product. For further information on the sources and methodology used to estimate the Farm Income and Wealth Statistics data please see the general documentation.

Net farm income is one of the most commonly used measures of profitability. It is the residual income left over after all the factors of production are paid. It represents the returns for operator labor, managements and equity, as well as any other unpaid resources used for farm production instead of elsewhere.

Net farm income is calculated in the Farm Income and Wealth Statistics data product. For further information on the sources and methodology used to estimate the Farm Income and Wealth Statistics data please see the general documentation.

Net Farm Income Formula

$$Net\ farm\ income_t = Value\ of\ production_t - Operating\ expenses_t + Net\ government\ transactions_t - Capital\ consumption_t - Payments\ to\ stakeholders_t$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product and are available from the value added by U.S. agricultural sector report.

Earnings Before Interest, Taxes, and Capital Consumption (EBITC)

Earnings before interest, taxes, depreciation, and amortization (EBITDA) is widely used as a profitability measure and is also recommended by the FFSC guidelines because for comparisons across industries because accounting and financing effects are ignored. Due to data limitations, it is not possible to calculate EBITDA at the sector level. Farm income and wealth statistics report capital consumption instead of depreciation allowed in the tax code. For this reason, capital consumption is used rather than depreciation as is recommended in the FFSC guidelines. Capital consumption represents the amount of farm sector capital used up in the production process or damaged in a given year. Capital consumption is estimated separately for automobiles, trucks, tractors, farm machinery, farm service buildings, and operator dwellings. These components are aggregated to sector capital consumption. Data on amortization -the depreciation of intangible assets-is not available and therefore excluded from the calculation.

EBITC Formula

$$EBITC_t = Net\ farm\ income_t + Interest\ expense_t + Taxes_t + Capital\ consumption_t$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Net farm income and interest expense data are available from the value added by U.S. agricultural sector report.

Operating Profit Margin Ratio

The operating profit margin ratio measures profitability as a proportion of total production. This ratio increases as expenses decrease relative to value of production. Higher values mean the sector is efficiently converting production into returns (net farm income, interest, and returns to unpaid labor and management).

The operating profit margin ratio, asset turnover ratio and rate of return on farm assets from income provide complimentary information on farm sector efficiency and profitability. The farm sector can increase its returns by increasing production or increasing the per unit profit margin. As a result, the following formula holds: *Asset turnover ratio$_t$ * Operating profit margin ratio$_t$ = Rate of return on assets from income$_t$.*

Operating Profit Margin Ratio Formula

$$Operating\ profit\ margin\ ratio_t = \frac{Net\ farm\ income_t + Interest\ expense_t - Returns\ to\ unpaid\ labor\ and\ management_t}{Value\ of\ production_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Net farm income and interest expense data are available from the value added by U.S. agricultural sector report. Many farms enterprises use unpaid operator or family member labor and management. From an economic perspective, it is necessary to subtract the opportunity cost of using this time as a production input. The estimate of the returns to unpaid labor and management is taken from the Agricultural Resource Management Survey (ARMS).

Total Rate of Return on Farm Equity

The rate of return on farm equity can be broken down into the returns from farm operations and capital gains. The rate of return from income provides a measure of farm operation profitability. Changes in the value of farm sector assets are used to measure the returns from capital gains. By including the return from farm operations and capital gains, the total rate of return on farm equity provides a measure of farm sector profitability more comparable to the return on other forms of investment such as stocks or bonds.

Total Rate of Return on Farm Equity Formula

$$Total\ rate\ of\ return\ on\ farm\ equity_t = Rate\ of\ return\ on\ farm\ equity\ from\ income_t + Rate\ of\ return\ on\ farm\ equity\ from\ capital\ gains_t$$

Data Sources

For additional information on the calculation of each component please see the documentation for the rate of return on farm equity from income and rate of return on farm equity from capital gains.

Rate of Return on Farm Equity from Income

The rate of return on farm equity from income measures the returns to farm sector equity from current farm operations. Unlike the rate of return on farm assets from income, this ratio does not add sector interest expenses back to farm income, because interest expense represents a return to creditors' claims on farm assets. Many farms enterprises use unpaid operator or family member labor and management. From an economic perspective, it is necessary to subtract the opportunity

cost of using this time as a production input. Typically a higher rate of return on farm equity from income signals increased profitability, while lower values suggest lower profits. However, the ratio is also sensitive to the sector's reliance on debt. Increases in farm sector debt-financed assets would reduce equity for a given level of assets, increasing the return on farm equity from current income.

Rate of Return on Farm Equity from Income Formula

$$Rate\ of\ return\ on\ farm\ equity\ from\ income_t = \frac{Net\ farm\ income_t - Returns\ to\ unpaid\ labor\ and\ management_t}{\frac{Equity_t + Equity_{t-1}}{2}}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Equity is reported on the farm sector balance sheet report. The estimate of the returns to unpaid labor and management is taken from the Agricultural Resource Management Survey (ARMS).

Rate of Return on Farm Equity from Capital Gains

The rate of return on farm equity from capital gains measures the returns to the sector's equity position from an increase in the value of sector assets.

Rate of Return on Farm Equity from Capital Gains Formula

$$Rate\ of\ return\ on\ farm\ equity\ from\ capital\ gains_t = \frac{Assets_t - Assets_{t-1}}{\frac{Equity_t + Equity_{t-1}}{2}}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Equity and assets are part of the farm sector balance sheet report.

Total Rate of Return on Farm Assets

The rate of return on farm assets can be broken down into the returns from farm operations and capital gains. The rate of return from income provides a measure of farm operation profitability. Changes in the value of farm sector assets are used to measure the returns from capital gains. The total rate of return on farm assets differs from total rate of return on farm equity because the former includes the returns to all stakeholders.

Total Rate of Return on Farm Assets Formula

$$Total\ rate\ of\ return\ on\ farm\ assets_t = Rate\ of\ return\ on\ farm\ assets\ from\ income_t + Rate\ of\ return\ on\ farm\ assets\ from\ capital\ gains_t$$

Data Sources

For additional information on the calculation of each component please see the documentation for the rate of return on farm assets from income and rate of return on farm assets from capital gains.

Rate of Return on Farm Assets from Income

The rate of return on farm assets from income measures the returns to farm sector assets from current farm operations. Unlike the case with the rate of return on farm equity from income, interest expenses are considered a return to assets and added back into net farm income. This is

done because interest expense represents a return to creditors' claims on assets. Many farms enterprises use unpaid operator or family member labor and management. From an economic perspective, it is necessary to subtract the opportunity cost of using this time as a production input. A higher rate of return on farm assets from income signals increased profitability.

The rate of return on farm assets from income, operating profit margin ratio and asset turnover ratio provide complementary information on farm sector efficiency and profitability. The farm sector can increase its returns by increasing production or increasing the per unit profit margin. As a result, the following formula holds: *Asset turnover ratio$_t$ * Operating profit margin ratio$_t$ = Rate of return on assets from income$_t$.*

Rate of Return on Farm Assets from Income Formula

$$Rate\ of\ return\ on\ farm\ assets\ from\ income_t = \frac{Net\ farm\ income_t + Interest\ expense_t - Returns\ to\ unpaid\ labor\ and\ management_t}{\frac{Assets_t + Assets_{t-1}}{2}}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Assets are reported as part of the farm sector balance sheet report. The estimate of the returns to unpaid labor and management is taken from the Agricultural Resource Management Survey (ARMS).

Rate of Return on Farm Assets from Capital Gains

The rate of return on farm assets from capital gains measures the returns to the assets from an increase in the assets' value, apart from their income generating potential.

Rate of Return on Farm Assets from Capital Gains Formula

$$Rate\ of\ return\ on\ farm\ assets\ from\ capital\ gains_t = \frac{Assets_t - Assets_{t-1}}{\frac{Assets_t + Assets_{t-1}}{2}}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Assets are reported as part of the farm sector balance sheet report.

Solvency Ratios

Solvency ratios compare the amount of debt relative to equity invested in the farm sector. The ratios are often referred to as measuring "leverage," which is the amount of debt used to finance assets. As a result, the ratios provide a measure of the sector's ability to repay financial liabilities via the sale of assets. By providing a picture of the sector's current financial position, the ratios also measure the farm sector's risk exposure and ability to overcome adverse financial events.

Each of the three solvency ratios reported (debt-to-asset, equity-to-asset, debt-to-equity) are inherently linked because all assets must either be claimed by the farm owner or owed to a creditor. Therefore, the equity-to-asset ratio and debt-to-asset ratio necessarily sum to one. The debt-to-equity ratio represents the proportion of assets owed to creditors relative to those financed by owner equity. As a result, it is the ratio of the debt-to-asset and equity-to-asset proportions. As a result, all three measures should provide similar conclusions on sector solvency.

Each data series used to calculate the solvency ratios is reported as part of the U.S. and State Farm

Income and Wealth Statistics. Comprehensive information on the calculation of farm sector asset, debt and equity levels can be found in the farm sector balance sheet documentation. The balance sheet values assets and debt at market value. Accordingly, two important considerations need to be made when interpreting the solvency ratios. The use of market as opposed to historical cost valuation makes it is more useful to compare sector solvency benchmarks to individual operations or classes of businesses; however, typical solvency ratios will vary substantially for farms engaged in different types of production. Additionally, when valuing assets at market, the deferred taxes on the potential sale of the assets should ideally be included as an expected debt liability in the balance sheet. Due to data limitations this is not currently possible. This may lead the resulting financial ratios to overstate the sector's solvency.

Debt-to-Asset Ratio

The debt to asset ratio measures the proportion of assets owed to creditors to cover outstanding debt obligations. Higher debt-to-asset ratios indicate more assets are financed by debt as opposed to owner capital (equity). A value of 1 would indicate all assets are financed by debt.

Debt-to-Asset Ratio Formula

$$Debt - to - asset\ ratio_t = \frac{Debt_t}{Assets_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Debt and asset data are both reported as part of the farm sector balance sheet report.

Debt-to-Equity Ratio

The debt-to-equity ratio measures the proportion of aggregate farm capital in the form of debt relative to owner provided capital (equity). A higher debt-to-equity ratio indicates more of the sector's assets are financed by credit relative to owner capital (equity). A value of 1 indicates an equal amount of debt and equity capital was used to finance farm sector assets.

Debt-to-Equity Ratio Formula

$$Debt - to - equity\ ratio_t = \frac{Debt_t}{Equity_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Debt and equity data are both reported as part of the farm sector balance sheet report.

Equity-to-Asset Ratio

The equity-to-asset ratio measures the proportion of farm assets that were financed by the owner's capital (equity). Alternatively, the ratio can be thought of as the percentage of farm sector assets claimed by farm owners. Higher equity-to-asset ratios indicate more assets are financed by owner capital (equity) as opposed credit. A value of 1 would indicate all assets are financed by owner equity.

Equity-to-Asset Ratio Formula

$$Equity - to - asset\ ratio_t = \frac{Equity_t}{Assets_t}$$

Data Sources

Each data series used in the calculation is available as part of ERS's Farm Income and Wealth Statistics data product. Equity and asset data are both reported as part of the farm sector balance sheet report.

Farm Income and Wealth Statistics

Related Topics

Farm Structure and Organization

ERS Coronavirus (COVID-19) Media Resources

Last updated: Wednesday, December 02, 2020

For more information, contact: Farm Income Team

Exhibit 27

Less wild blueberries for strong demand

Wild blueberries look to be down in volume.

“The forecast for wild blueberries in Eastern Canada and Maine a month ago was targeted to be around 290-300 million lbs. But there was frost in Maine and in New Brunswick, so those regions were quite impacted with these issues,” says Jean-Pierre Senneville, president of Quebec Wild Blueberries based in St-Félicien, Que. He also notes that recent dry weather in Nova Scotia and Maine may also have affected the crop. “Right now, we are hearing that the overall volumes shouldn’t be more than 225 million lbs. There’s a decrease in volume,” he says.

Add to that Quebec’s own production which Senneville says should be similar to last year or possibly up slightly. “We still have three weeks to a full month of harvest to go but the projection is for a very satisfying crop for Quebec. We’ll have 80 million plus pounds from Quebec alone,” says Senneville.

Pressure from strong fresh market

Overall, these numbers are coming into a market for processing blueberries that already looks to be lower. “There are approximately 100 million lbs. less fruit for cultivated blueberries in the U.S. British Columbia also has 30 percent less than last year,” says Senneville. “And there’s a very strong fresh market so I would assume that there wouldn’t be any more than 350 million lbs. of fruit for processing this year compared to more than 400+ million lbs. last year. So, less fruit for processing and no inventory for wild blueberries.”

In fact, the pandemic has sparked a strong interest in frozen fruit, says Senneville. “The retail sector has been phenomenal,” he says. “People were looking for fruit to put in their fridge or freezer for another day because they couldn’t shop every day. So frozen fruit and even more so, organic frozen fruit, were more popular. Organic retail bags had a very very strong demand.”

The challenges with labor

To meet that demand, the regions though are dealing with labor challenges as are many growing regions across North America. “We still have three weeks to a full month of harvest to go and we need to harvest it all despite the lack of labor,” says Senneville. He says the shortage in labor is tied to numerous issues including foreign government hesitancy over issuing work Visas to political issues and more.

As for pricing, Senneville believes while it's still difficult to establish, he anticipates pricing should see an increase. "I'm doubtful we can fulfill the old pipeline so we'll have to figure out what level we'll be at," says Senneville.

Looking ahead, Senneville is watching the weather in regions such as Maine and Nova Scotia which have recently seen high temperatures that have impacted the crop. "Hopefully, we can stabilize the volumes that were already diminished," he says.

For more information:
Jean-Pierre Senneville
Quebec Wild Blueberries
Tel: +1 (418) 679-4577 x 327
jps@wild-blueberries.com
https://www.wild-blueberries.com/pages-eg/entreprise.htm (https://www.wild-blueberries.com/pages-eg/entreprise.htm)

Publication date: Fri 28 Aug 2020
Author: Astrid Van Den Broek

Exhibit 28

Tough times for blueberry growers reflect global struggles

By Peter McGuireStaff Writer

This summer, for the first time in four generations, the Hammond family won't harvest the wild blueberries they tend on almost 200 acres Down East.

Like anyone who makes a living off the land, the Hammonds have weathered ups and downs for nearly seven decades, but the last few years have been the toughest in memory.

Last year, the family lost $20,000 on their harvest of almost 200,000 pounds of berries. Robert Hammond, 76, knew the risk he was taking – the year before the average price processors paid for wild blueberries plummeted to 25 cents a pound, drawn down by a market glut and foreign competition from 90 cents a pound seven years prior.

In the same year, the number of berries harvested slid 33 percent, to about 67.8 million pounds.

"I gambled and I lost," said Hammond, who lives in Harrington. "I knew there wasn't going to be a big crop. I figured with a small crop the price would increase and it did. By a nickel."

It was the last straw. This year, they plan to harvest only enough to sell fresh berries, about 7 percent of their entire crop.

"I'm not going to do it anymore," Hammond said. "We are not going to harvest at all, except for fresh pack."

The Hammonds and growers like them are riding a seismic shift in the state's wild blueberry business, triggered by a massive global cultivated blueberry industry and a production surge in Canadian wild berries aided by government support like access to public land and a weak Canadian dollar.

Economic anxiety has pushed to the forefront growers' grievances against the handful of companies that process and freeze 99 percent of the state's wild blueberry harvest. There are

about 485 blueberry producers in Maine, down from 510 in 2012, according to the U.S. Department of Agriculture.

Some growers accuse processors of wielding too much influence on the Wild Blueberry Commission of Maine, the quasi-public agency responsible for marketing and promoting the state's legacy fruit.

Companies like Cherryfield Foods, Maine's biggest processor and grower, have used tax money to benefit themselves at the expense of independent growers, said Courtney Hammond, who tends the family barrens with his father.

"They have not looked out for the whole industry," Courtney Hammond said. "The organic producers, fresh-pack processors, mom-and-pop operations have all been left out."

Hammond is referring to money raised from a 1.5 cent tax levied on every pound of berries that is harvested and processed, about $1.5 million a year that pays for the commission's operations.

More than half that amount is funneled into a regional trade association, the Wild Blueberry Association of North America, mainly to market frozen berries as ingredients for products like muffin mixes, in restaurants and retail sales.

Some growers nurse other resentments. Depending on their contract, some growers don't know how much they will be paid for their berries until months after harvest, which means what looked like a bountiful harvest might end up a bust. If the federal government purchases surplus berries, like a $9.4 million buy last year, it only benefits processors, growers complain. Cherryfield Foods, a Canadian company with operations in Maine, was the only company awarded the federal contract for frozen berries last year.

"Those five processors have ultimately been looking out for themselves for more than 20 years to the detriment of the independent growers they buy fruit from," Hammond said.

VULNERABLE MARKETS

Not everyone agrees. Tony Shurman, president and CEO of Jasper Wyman and Sons, a major processor and grower in Milbridge, said the company has gone above and beyond to maintain good relations with its growers. While he doesn't think Wyman's is the target of criticism lobbed by some growers, Shurman recognizes that times are tough and tempers short.

“It is a trying time for the industry, there is no question about that,” he said. “The more we can work together to come up with ways to promote and market and find new avenues to sell more blueberries, the better it is for everyone.”

A bill pending in the Legislature would reform the blueberry commission, giving equal membership to growers and processors. Instead of an eight-member commission with five processors and three growers, the change would put 10 commissioners with equal representation for the two groups.

With equivalent representation, the commission may more forcefully advocate for Maine’s wild blueberry industry, some growers hope.

That may mean developing new products, promoting fresh and organic berries and lobbying state and federal governments for support and protection from foreign imports, said Greg Bridges, a farmer in Baring.

Bridges used to serve on the board of the Wild Blueberry Association and chaired its marketing committee for more than 10 years. The threat that cheap, Canadian berries posed to Maine’s industry was clear during his time on the board, but no one at the commission or the state and federal government moved to help Maine growers, Bridges said.

“There should have been a call to action a lot sooner when it came to addressing the big Canadian subsidies,” Bridges said. “I blame the board for not protecting our markets.”

Maine’s two biggest processors, Wyman’s and Cherryfield, have operations in Canada. Cherryfield, the largest wild blueberry grower in the state, is a subsidiary of Oxford Frozen Foods, a Nova Scotia company that advertises itself as the world’s largest supplier of frozen wild blueberries.

CANADA RAMPS UP

Maine is the only state with a commercial wild blueberry crop, and for generations Maine berries have dominated the frozen market.

But in recent years massive wild blueberry harvests in Canada and a booming market for frozen cultivated blueberries eroded Maine’s prominence.

Less than 20 years ago, Maine and Canada each produced about 75 million pounds. In 2017, Canada produced 206.4 million pounds, more than three times Maine’s yield, according to University of Maine records. In the same year, farmers from the U.S. and Canada harvested 259 million pounds of cultivated berries to freeze.

“The frozen blueberry wave kind of overtook us,” said David Bell, general manager of Cherryfield Foods.

Maine pioneered marketing blueberries as a superfood, bursting with restorative and disease-reversing properties. Now, the industry is trying to differentiate wild blueberries from cultivated varieties by touting the intense flavor and better health benefits of wild berries.

“My frustration is that we are still a fruit- and vegetable-deficient society,” Bell said. “There is plenty of stomach out there; the question is how to get at it.”

WILD vs. CULTIVATED

Some wonder if the commission has done enough to diversify its marketing to fresh, organic and other wild blueberry products.

Lynn Thurston, owner of Blue Sky Produce, a fresh berry wholesaler, buys from a dozen small growers and sells berries to chain stores as far away as Pennsylvania and New Jersey.

Unlike frozen berries, the $2 a pound fresh berries fetch growers has remained stable over the last decade. However, fresh berries are only available for a few weeks out of the year and are too fragile to ship long distances. In 2017, only 350,000 pounds of berries were picked for the fresh market.

When customers taste wild berries, they prefer them to cultivated ones, Thurston said. Unfortunately, few retail customers in the U.S., the biggest blueberry market in the world, can recognize the difference.

“I think the commission has a long way to go to educate the public,” Thurston said. “The problem is that they don’t give people a reason to care what blueberries are in their muffins because they don’t know what wild blueberries are.”

Consumers are likely unaware of the controversy around blueberry production because retail prices have not fluctuated wildly. A 3-pound bag of frozen wild blueberries in a supermarket has been roughly $10 for the past several years.

Bell, from Cherryfield Foods, bristles at the idea the commission has not done enough to help small growers. The commission distributes free placemats and recipe cards to advertise fresh berries and recently established a fresh-pack and value-added committee to advocate for those industry segments.

“I would say it is patently unfair,” Bell said. “No one in the industry has succinctly said that over the course of four or five years … these were poor decisions or missed opportunities.”

Processors also push back against charges that growers have been treated unfairly.

It is true some growers don’t know what price they will get for their harvest until months after harvest, but that is simply a function of the commodity market, said Simeon Allen, from W.R. Allen, a small processing company in Orland. So many factors go into the calculation – leftover supply, quality, size and demand, to name a few.

“The market price, no one knows until we know what the supply is,” he said. “Of course it’s a gamble; it’s farming.”

Right now, because of the glut, prices are bad. And even though his company pays a fair price and works well with its growers, some of the blame is being pushed onto processors.

“I think with the really bad blueberry market right now, they are pointing the finger at the processors, which really isn’t true,” Allen said. “They have to take the blame out on someone.”

DOWNTURN, OR WORSE?

There is fear it is already too late to preserve Maine’s wild blueberry industry.

The average age of farmers in Washington County is 58, and more than a quarter are older than 65. In one of Maine’s oldest and poorest counties, it is uncertain if new blueberry growers will come up to replace them.

An entire way of life, when blueberry harvesting was a critical piece to the seasonal cycle of work, could be disappearing.

“I don’t know, we might be at the point where what we are trying to do is already too late to save the industry as we know it,” said Robert Hammond.

David Yarborough, who has studied wild blueberries for 40 years at the University of Maine, agrees things look grim for the industry right now. But context is important, he adds. Maine’s wild blueberry industry has persisted despite repeated downturns and spells of bad weather. Even with the average price so low, some farmers are still getting a good return from their fields, and the surplus from a few years ago has been depleted, Yarborough said.

Better times might be on the horizon.

“Agriculture is up and down, when you are farming for the long term,” Yarborough said. “There are still a lot of fields out there that are in good shape, there may be opportunities.

“We will come back out of it, with the industry looking different.”

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Exhibit 29

USDA Foreign Agricultural Service
GAIN Report
Global Agricultural Information Network

Voluntary _ Public

Date: 12/29/2017
GAIN Report Number: CA17048

Canada

Post: Ottawa

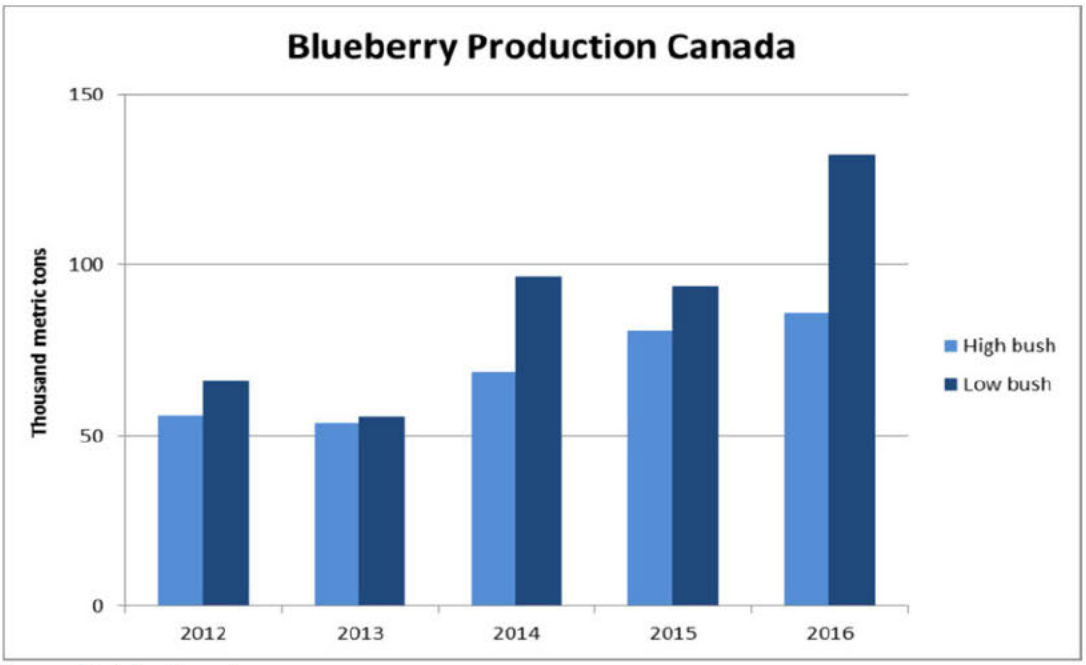
High Bush Blueberry Production in Canada

Report Categories:
Fresh Fruit
Agricultural Situation

Approved By:
Evan Mangino, Agricultural Attaché
Prepared By:
Alexandrea Watters, Agricultural Specialist

Report Highlights:
Blueberries are the top horticulture crop in Canada, accounting for approximately 25 percent of horticultural farm gate value. In the last five years, Canadian low bush (wild) and high bush (cultivated) blueberry production has grown significantly. While increased production and changing consumer trends have contributed to a decline in farm gate value for low bush blueberries, high bush blueberry farm gate values increased through 2016. The majority of Canadian high bush blueberry production is concentrated in the Province of British Columbia, which exports more than 95 percent of Canadian fresh cultivated blueberries.

Keywords: Canada, CA17048, Blueberry



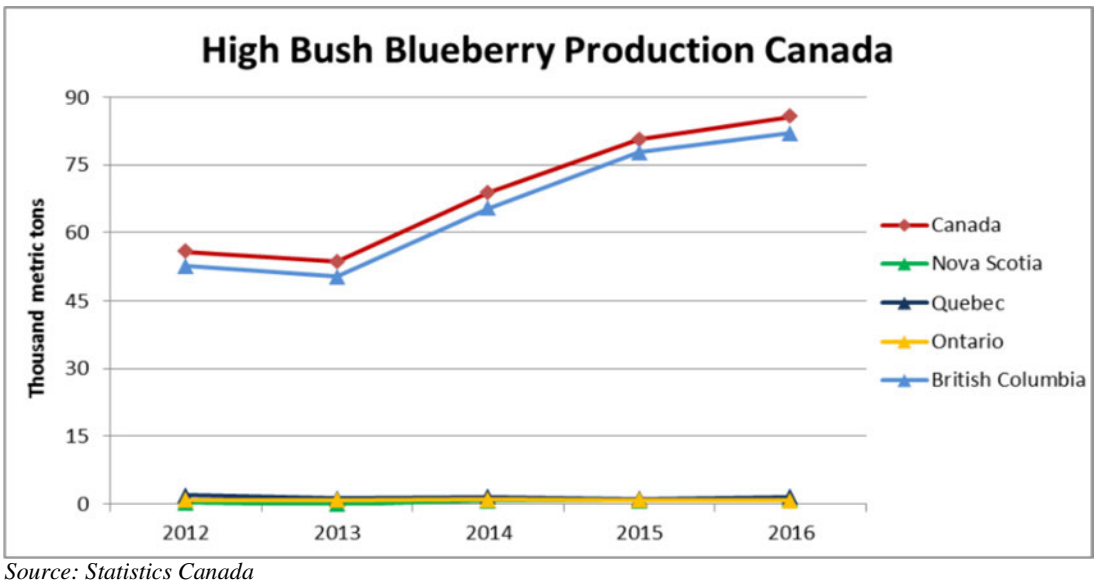
Source: Statistics Canada

CANADA: High Bush Blueberries

	2012	2013	2014	2015	2016
Production (metric tons)	55,737	53,549	68,830	80,615	85,769
Area planted (hectares)	9,830	9,780	9,490	10,511	10,523
Area harvested (hectares)	8,249	8,891	8,881	10,127	10,093

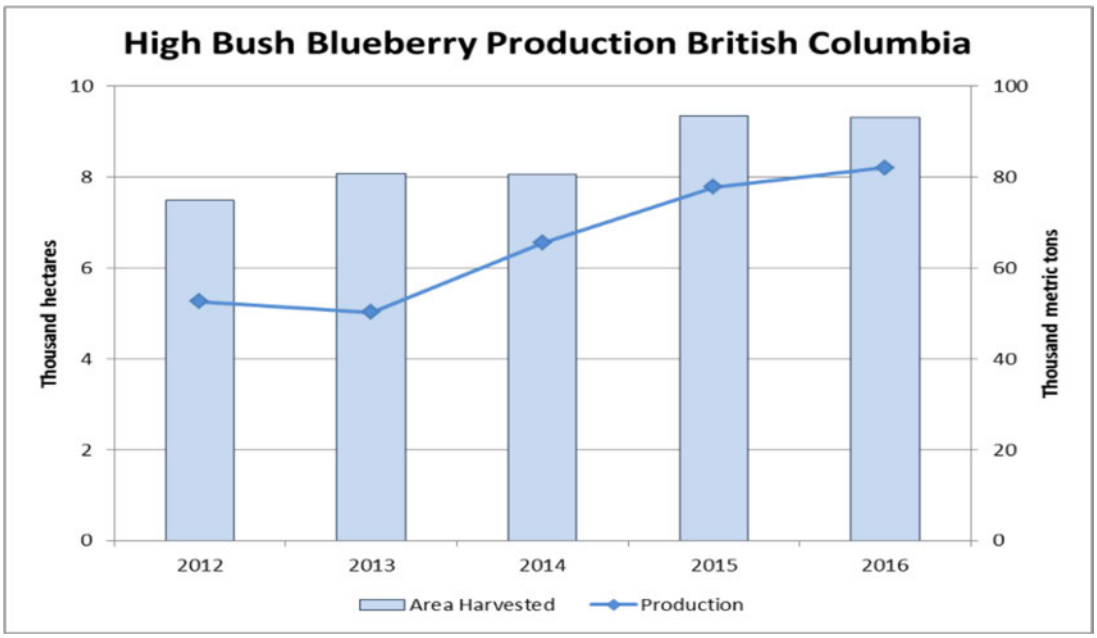
Source: Statistics Canada

Blueberries are Canada's top horticulture crop according to reports from Agriculture and Agri-Food Canada, with blueberries accounting for approximately 25 percent of fresh fruit farm gate value in Canada and remaining the top fruit export by value despite the 2016 decline in export volumes and values. From 2012 to 2016 Canada saw large increases in blueberry production with low bush blueberry production increasing 100 percent from 66,044 metric tons (MT) to 132,235 MT and high bush blueberry production increasing 54 percent from 55,737 MT to 85,769 MT. Low bush blueberry production is concentrated in Eastern Canada, with the province of Quebec being the largest producer followed by New Brunswick. Approximately 96 percent of Canadian high bush blueberry production is in the province of British Columbia.



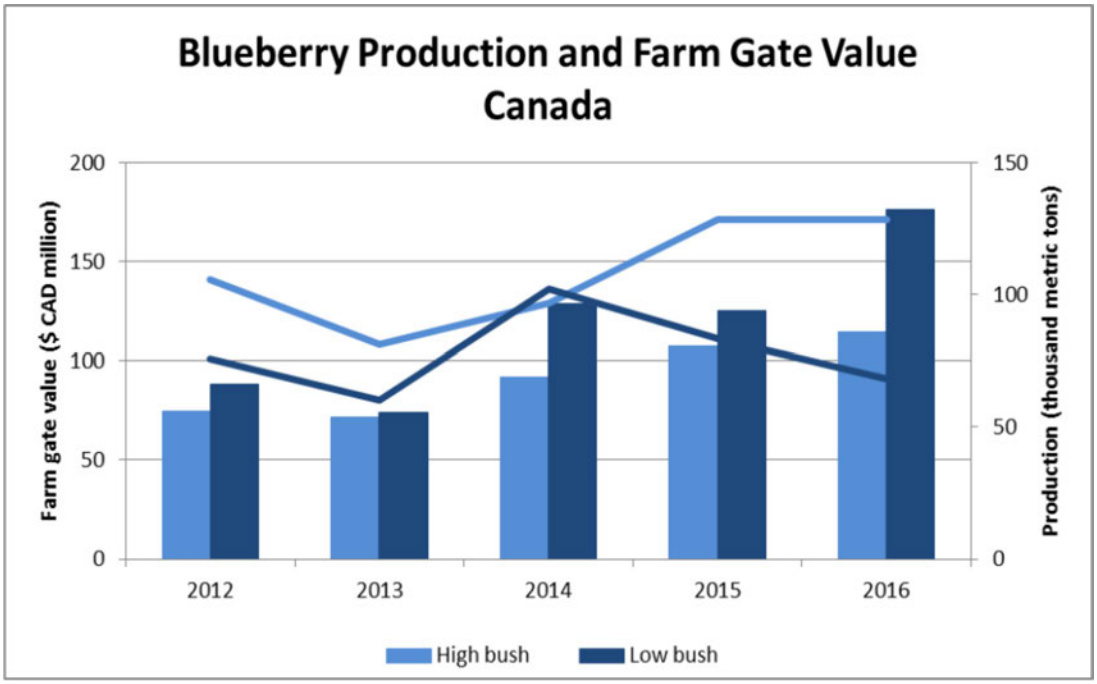
Source: Statistics Canada

British Columbia high bush blueberry production increased 56 percent from 52,597 MT in 2012 to 82,005 MT in 2016. Planted area increased 9 percent over that time period while harvested area increased 24 percent as previously planted area reached maturity.



Source: Statistics Canada

While the farm gate value of low bush blueberries has been in decline, falling to $91 million CAD in 2016 after peaking in 2014, the farm gate value of high bush blueberries increased to approximately $171 million CAD in 2016.



Source: Statistics Canada

British Columbia High Bush Blueberry Exports

British Columbia produces between 96 and 98 percent of Canadian exports of fresh cultivated blueberries in any given year, with 98 percent of exports destined for the United States. With increased competition from geographically proximate U.S. growers, Oregon and Washington State in particular, the province of British Columbia has been exploring Asia-Pacific markets for increased export opportunities.

In 2016, China approved 10 packing companies and 19 production facilities in British Columbia for export to the Chinese market. Reports indicate that Canadian exports to China were negatively impacted in 2016, as an early harvest in British Columbia placed Canadian fresh cultivated blueberries in direct competition with Chinese product. Sources indicate that the 2017 harvest, beginning in mid-July, was more in-line with traditional harvesting times and more complementary to the Chinese growing season, which typically winds down at that time. However, year-to-date trade data indicate Canadian exports of fresh cultivated blueberries to China are down 8 percent from 2016. This may be a result of a slightly smaller British Columbia crop leaving less production for export, a lack of demand from the Chinese market, or the high landed cost of Canadian fresh blueberries after tariffs.

In 2016, Canadian blueberry exports to China faced a 30 percent tariff rate. While media outlets have reported a tariff rate decrease in 2017, Global Affairs Canada (GAC) confirmed that Canadian fresh

blueberries continue to face a 30 percent tariff in the Chinese market. GAC noted that China did reduce tariffs for certain Canadian fruit and vegetable products in 2017, but the tariff for Canadian fresh blueberries remained unchanged in 2017. The World Trade Organization reported a 30 percent bound duty for Most-Favoured-Nations, including Canada, in 2017.

Data through October 2017 indicate that Canada is on pace to recover from 2016's fresh cultivated blueberry export declines and return to the record high export level of 2015. Exports to Hong Kong, while representing a very small share of Canada's total exports, reached 10-year highs in 2016 and 2017. Hong Kong does not impose a duty on fresh blueberries. Canadian exports to Japan and Australia have been falling in recent years, particularly as Australia is reported to be improving production techniques and making is own inroads into East Asian markets.

Canada: Exports of cultivated blueberries (HS 08104012)

Calendar year/ Quantity in metric tons

	2012	2013	2014	2015	2016	2017*
World	**21,804**	**21,498**	**24,437**	**25,692**	**21,922**	**24,365**
United States	**21,672**	**21,395**	**24,290**	**25,150**	**21,621**	**24,102**
China	0	0	8	2	84	77
Australia	0	0	21	120	81	40
Hong Kong	9	14	40	9	66	72
Japan	86	69	44	64	27	17
All other countries	37	20	34	347	43	57

*Year-to-date (October 2017)

Source: Global Trade Atlas

Exhibit 30

CANADIAN GROCER
(https://www.canadiangrocer.com)

(https://www.linkedin/company/canadian-grocer-magazine)

Is the blueberry industry in peril?

Price cuts and unfavourable weather conditions and are hurting producers in the U.S. and Canada

The Associated Press | September 04, 2018

IN THE ERA OF SUPERFOODS, MAINE BLUEBERRIES AREN'T SO super.

The Maine wild blueberry industry harvests one of the most beloved fruit crops in New England, but it's locked in a downward skid in a time when other nutrition-packed foods, from acai to quinoa, dominate the conversation about how to eat. And questions linger about when, and if, the berry will be able to make a comeback.

The little blueberries are touted by health food bloggers and natural food stores because of their hefty dose of antioxidants. But the industry that picks and sells them is dealing with a long-term price drop, drought, freezes, diseases and foreign competition, and farmers are looking at a second consecutive year of reduced crop size.

At Beech Hill Blueberry Farm in Rockport, this year's harvest was off by about 50%, said Ian Stewart, who runs the land trust that manages the farm.

"Our year was a little underwhelming. There was a lot of drought. There was a freeze at a bad time," Stewart said. "We're hoping it's a blip. We'll see."

North America's wild blueberry industry exists only in Maine and Atlantic Canada, and an oversupply of berries in both places caused prices to harvesters to plummet around 2015. Recent years have brought new challenges, such as particularly bad spells of mummy berry disease, a fungal pathogen, and difficulty in opening up new markets.

Woes in the industry have caused some growers to scale back operations in Maine. Harvesters collected a little less than 68 million pounds of wild blueberries in the state in 2017, which was the lowest total since 2005 and more than 33 million pounds less than 2016. Last year's price of 26 cents per pound to farmers was also the lowest since 1985, and was more in line with the kind of prices farmers saw in the early 1970s than in the modern era.

This year's harvest was mostly wrapped by late August, a little earlier than usual, and members of the industry said they believed it was another year of lower harvest. Exact totals aren't available yet, but signs point to a crop that's "similar to last year, or even smaller," said Nancy McBrady, executive director of the Wild Blueberry Commission of Maine.

The industry has tried to focus on growing the appeal of the health aspects of wild blueberries, which are richer in antioxidants than their cultivated cousins, but it has been a slow climb, McBrady said.

"For years, the health message and the taste message of wild blueberries has been successful," she said. "But it's frustrating when we find ourselves in periods of oversupply and competition."

Nearly 100% of the wild crop is frozen, and the berries are used in frozen and processed foods. Prices to consumers at farm stands and grocery stores have held about steady in the face of falling prices to harvesters.

The same berries are harvested in Quebec, New Brunswick, Nova Scotia, Newfoundland and Prince Edward Island, and the weakness of the Canadian dollar has also hurt the U.S. industry because Canadian berries sell for less. Some companies operate on both sides of the border, and an equal exchange rate is better for business.

Such financial stress played a role in growers harvesting 5,000 fewer acres in the U.S. last year, said David Yarborough, a horticulture

professor at the University of Maine. He said he expected a similar drop this year. Other factors, such as poor pollination last year, have also held the crop back, he said.

Exhibit 31

Volume of Underselling, POI

See Fresh and Frozen underselling tables within this workbook. Apparent domestic consumption from Prehearing Report Tables IV-1,3, and 5.

Note: Exhibit 55 of the Alliance's Prehearing Brief included an error and understated the instances and volume of underselling. This has been corrected below.

	pounds (POI)			*pounds (POI)*	%
	Volume Undersold	**Total Volume with Comparisons**	**% Undersold**	**POI Apparent Domestic Consumption**	**Coverage**
Fresh	704,510,053	845,855,802	83.3%	3,474,193,000	n/a
Frozen	[		]	2,552,514,000	[ ]
Total	[		]	6,026,706,000	[ ]

Replication of Staff's Underselling Numbers on V-55: Fresh Blueberries

Source: Prehearing Report Tables V-16-29. The aggregate matches Staff Reports's summary of underselling on V-55.

Reflects all pricing comparisons over POI.

	Instances		
Source	**Monthly Product Price Comparisons with U.S.**	**Undersold**	**% Under**
Argentina & Uruguary	6	1	16.7%
Canada	33	32	97.0%
Chile	11	11	100.0%
Mexico	23	16	69.6%
Peru	18	2	11.1%
	91	62	68.1%

Fresh: Volume of Underselling using Import Data

Explanation

Staff Report Tables V-16-19 provides monthly price comparisons for four products and each country, based on AMS shipping point data for which there are no associated volumes. In order to assess the volume of undersold imports, each ***country/month observation*** was assessed based on its four product-specific price comparisons and classified as "No Comparison," "All Underselling," All Overselling," or "Mixed." Monthly import volume of fresh blueberries were then matched to each country month, as summarized below.

	Months with no US-country price comparisons.		*Months where all US-country price comparisons were oversold.*		*Months where all US-country price comparisons were undersold.*		*Months where US-country price comparisons showed underselling and overselling.*			
	No comparisons		**All Overselling**		**All Underselling**		**Mixed Under/overselling**		**% Under**	
Source	***Pounds***	***Instances***	***Pounds***	***Instances***	***Pounds***	***Instances***	***Pounds***	***Instances***	***Pounds***	***Instances***
Argentina & Uruguary	85,620,525	0	13,958,953	5	11,331,506	1	0	0	44.8%	16.7%
Canada	10,528,716	0	0	0	424,751,909	31	7,270,962	2	98.3%	93.9%
Chile	700,223,959	0	0	0	81,647,952	11	0	0	100.0%	100.0%
Mexico	151,591,393	0	41,738,734	7	172,144,097	16	0	0	80.5%	69.6%
Peru	287,189,505	0	78,377,100	16	14,634,589	2	0	0	15.7%	11.1%
	1,235,154,098	0	134,074,787	28	704,510,053	61	7,270,962	2	83.3%	67.0%

Volume of Underselling for Frozen Blueberries

Source: Prehearing Report Tables V-20-23.

Note: Exhibit 55 of the Alliance's Prehearing Brief included an error that understated the instances and volume of underselling of frozen blueberries. This has been corrected below.

	Instances			Volume (pounds)			% Undersold	
Source	Undersold	Oversold	Total	Undersold	Oversold	Total w Price Comparison	Instances	Volume
Argentina	[							]
Canada	[							]
Chile	[							]
Total	[							]

Exhibit 32

Canada vs. United States

Demographics

	Canada	United States
Population	37,694,085 (July 2020 est.)	332,639,102 (July 2020 est.)
Age structure	0-14 years: 15.99% (male 3,094,008/female 2,931,953) 15-24 years: 11.14% (male 2,167,013/female 2,032,064) 25-54 years: 39.81% (male 7,527,554/female 7,478,737) 55-64 years: 14.08% (male 2,624,474/female 2,682,858) 65 years and over: 18.98% (male 3,274,298/female 3,881,126) (2020 est.)	0-14 years: 18.46% (male 31,374,555/female 30,034,371) 15-24 years: 12.91% (male 21,931,368/female 21,006,463) 25-54 years: 38.92% (male 64,893,670/female 64,564,565) 55-64 years: 12.86% (male 20,690,736/female 22,091,808) 65 years and over: 16.85% (male 25,014,147/female 31,037,419) (2020 est.)
Median age	total: 41.8 years male: 40.6 years female: 42.9 years (2020 est.)	total: 38.5 years male: 37.2 years female: 39.8 years (2020 est.)
Population growth rate	0.81% (2020 est.)	0.72% (2020 est.)
Birth rate	10.2 births/1,000 population (2020 est.)	12.4 births/1,000 population (2020 est.)
Death rate	7.9 deaths/1,000 population (2020 est.)	8.3 deaths/1,000 population (2020 est.)
Net migration rate	5.6 migrant(s)/1,000 population (2020 est.)	3 migrant(s)/1,000 population (2020 est.)
Sex ratio	at birth: 1.05 male(s)/female 0-14 years: 1.06 male(s)/female 15-24 years: 1.07 male(s)/female 25-54 years: 1.01 male(s)/female 55-64 years: 0.98 male(s)/female 65 years and over: 0.84 male(s)/female total population: 98.3 male(s)/female (2020 est.)	at birth: 1.05 male(s)/female NA 0-14 years: 1.04 male(s)/female 15-24 years: 1.04 male(s)/female 25-54 years: 1.01 male(s)/female 55-64 years: 0.94 male(s)/female 65 years and over: 0.81 male(s)/female total population: 97.1 male(s)/female (2020 est.)
Infant mortality rate	total: 4.3 deaths/1,000 live births male: 4.5 deaths/1,000 live births female: 4.1 deaths/1,000 live births (2020 est.)	total: 5.3 deaths/1,000 live births male: 5.7 deaths/1,000 live births female: 4.9 deaths/1,000 live births (2020 est.)
Life expectancy at birth	total population: 83.4 years male: 81.1 years female: 85.9 years (2020 est.)	total population: 80.3 years male: 78 years female: 82.5 years (2020 est.)

	Canada	United States
Total fertility rate	1.57 children born/woman (2020 est.)	1.84 children born/woman (2020 est.)
HIV/AIDS - adult prevalence rate	NA	NA
Nationality	noun: Canadian(s) adjective: Canadian	noun: American(s) adjective: American
Ethnic groups	Canadian 32.3%, English 18.3%, Scottish 13.9%, French 13.6%, Irish 13.4%, German 9.6%, Chinese 5.1%, Italian 4.6%, North American Indian 4.4%, East Indian 4%, other 51.6% (2016 est.) **note:** percentages add up to more than 100% because respondents were able to identify more than one ethnic origin	white 72.4%, black 12.6%, Asian 4.8%, Amerindian and Alaska native 0.9%, native Hawaiian and other Pacific islander 0.2%, other 6.2%, two or more races 2.9% (2010 est.) **note:** a separate listing for Hispanic is not included because the US Census Bureau considers Hispanic to mean persons of Spanish/Hispanic/Latino origin including those of Mexican, Cuban, Puerto Rican, Dominican Republic, Spanish, and Central or South American origin living in the US who may be of any race or ethnic group (white, black, Asian, etc.); an estimated 16.3% of the total US population is Hispanic as of 2010
HIV/AIDS - people living with HIV/AIDS	NA	NA
Religions	Catholic 39% (includes Roman Catholic 38.8%, other Catholic .2%), Protestant 20.3% (includes United Church 6.1%, Anglican 5%, Baptist 1.9%, Lutheran 1.5%, Pentecostal 1.5%, Presbyterian 1.4%, other Protestant 2.9%), Orthodox 1.6%, other Christian 6.3%, Muslim 3.2%, Hindu 1.5%, Sikh 1.4%, Buddhist 1.1%, Jewish 1%, other 0.6%, none 23.9% (2011 est.)	Protestant 46.5%, Roman Catholic 20.8%, Jewish 1.9%, Mormon 1.6%, other Christian 0.9%, Muslim 0.9%, Jehovah's Witness 0.8%, Buddhist 0.7%, Hindu 0.7%, other 1.8%, unaffiliated 22.8%, don't know/refused 0.6% (2014 est.)
HIV/AIDS - deaths	NA	NA

	Canada	United States
Languages	English (official) 58.7%, French (official) 22%, Punjabi 1.4%, Italian 1.3%, Spanish 1.3%, German 1.3%, Cantonese 1.2%, Tagalog 1.2%, Arabic 1.1%, other 10.5% (2011 est.)	English only 78.2%, Spanish 13.4%, Chinese 1.1%, other 7.3% (2017 est.) **note:** data represent the language spoken at home; the US has no official national language, but English has acquired official status in 32 of the 50 states; Hawaiian is an official language in the state of Hawaii, and 20 indigenous languages are official in Alaska
School life expectancy (primary to tertiary education)	total: 16 years male: 16 years female: 17 years (2018)	total: 16 years male: 16 years female: 17 years (2018)
Education expenditures	5.3% of GDP (2011)	5% of GDP (2014)
Urbanization	urban population: 81.6% of total population (2020) rate of urbanization: 0.97% annual rate of change (2015-20 est.)	urban population: 82.7% of total population (2020) rate of urbanization: 0.95% annual rate of change (2015-20 est.)
Drinking water source	improved: urban: 100% of population rural: 98.9% of population total: 100% of population unimproved: urban: 0% of population rural: 1.1% of population total: 0% of population (2017 est.)	improved: urban: 100% of population rural: 97% of population total: 99% of population unimproved: urban: 0% of population rural: 3% of population total: 1% of population (2017 est.)
Sanitation facility access	improved: urban: 100% of population rural: 98.7% of population total: 100% of population unimproved: urban: 0% of population rural: 1.3% of population total: 0% of population (2017 est.)	improved: urban: 100% of population rural: 100% of population total: 100% of population unimproved: urban: 0% of population rural: 0% of population total: 0% of population (2017 est.)
Major cities - population	6.197 million Toronto, 4.221 million Montreal, 2.581 million Vancouver, 1.547 million Calgary, 1.461 million Edmonton, 1.393 million OTTAWA (capital) (2020)	18.804 million New York-Newark, 12.447 million Los Angeles-Long Beach-Santa Ana, 8.865 million Chicago, 6.371 million Houston, 6.301 million Dallas-Fort Worth, 5.322 million WASHINGTON, D.C. (capital) (2020)
Maternal mortality rate	10 deaths/100,000 live births (2017 est.)	19 deaths/100,000 live births (2017 est.)
Health expenditures	10.6% (2017)	17.1% (2017)

	Canada	United States
Physicians density	2.31 physicians/1,000 population (2017)	2.61 physicians/1,000 population (2017)
Hospital bed density	2.5 beds/1,000 population (2017)	
Obesity - adult prevalence rate	29.4% (2016)	36.2% (2016)
Mother's mean age at first birth	29 years (2017 est.)	26.4 years (2015 est.)
Dependency ratios	total dependency ratio: 51.2 youth dependency ratio: 23.9 elderly dependency ratio: 27.4 potential support ratio: 3.7 (2020 est.)	total dependency ratio: 53.9 youth dependency ratio: 28.3 elderly dependency ratio: 25.6 potential support ratio: 3.9 (2020 est.)

Source: CIA Factbook

EXHIBIT 33

FreshFruitPortal.com (https://www.freshfruitportal.com)

What are the prospects for U.S. blueberries in China?

July 06 , 2020

The U.S. fresh blueberry industry achieved a milestone in May when it finally gained access to the Chinese market after many years of negotiations. However, successfully exporting to this demanding and distant market comes with numerous challenges, some of which are outside the industry's control. At FreshFruitPortal.com we spoke with industry actors in China, the U.S. and Chile to hear about the prospects for blueberry exports, and what it will take to gain a foothold in the market.

For Sebastian Deng who heads up one of Shanghai's leading blueberry importers, Peng Sheng, there is indeed room and an opportunity for U.S. blueberries in China.

But he emphasized that in parallel with strong consumption growth over recent years - driven both by imports and domestic production - the market demands and requirements have also increased as more high-quality fruit has become available.

"If you ask me what the market is looking for, I would say that firstly it has to be a firm fruit, and then it has to have a good taste," he said.

A high Brix level is also crucial, but it's important to get the right balance between sweetness and a bit of acidity, he said. Appearances also matter hugely in China,

even more so than the size of the fruit.

"The size isn't so important – if it's a medium-size 14 or 16-count fruit, that's fine in China – but the appearance has to be good, because local fruit from the north of China has very good bloom," he said.

As for the window the U.S. should aim for, Deng says the biggest opportunity for the country is late summer, around August and September. That is both when local supplies are past their peak in June and July and also when supplies from Peru are minimal.

Fruit from Peru, which has been ramping up shipments to China since it gained market access three years ago, begins to arrive in heavy volumes from around October.

Deng said the U.S. should be able to compete well with Peru fruit in late summer, as the Brix levels in the South American country's early fruit tends not to be high as later in its season.

However, while the U.S. could compete in terms of quality during the late summer period, it currently wouldn't be able to do so in terms of price. That's because the U.S. blueberries face a 75% tariff in China, whereas Peru is tariff-free thanks to a free trade agreement. Domestic supplies would also be considerably cheaper.

Such a high tariff would greatly limit exports, Deng said, but a lower rate – around 10% or 15% – would be workable.

"If they can do a good postharvest and with competitive prices, I think that there could be good volumes, because consumption in China is growing quickly," he said.

A different kind of blueberry business for the U.S.

In the U.S. there is excitement over having opened such an important global market tempered by concerns over the high tariffs and the logistical aspects that could make getting the fruit there in good condition and quality a challenge.

Alicia Adler, Vice President of the North American Blueberry Council (NABC), said that organization has looked forward to introducing U.S. fresh blueberries to China for "a long time now".

"Despite China's growing blueberry production and increasing imports from other supplying regions in South America, there's ample opportunity for U.S. blueberries during the July through September market window, and I'm confident that Chinese consumers will enjoy the size and flavor that U.S. producers can provide," she said.

"The U.S. is home to some of the most sophisticated growing and exporting

operations in the world, and our growers are well-positioned to meet the increasing market demand in China."

NABC is currently focused on supporting the industry's initial entry to the market while the U.S. Highbush Blueberry Council (USHBC) will develop marketing programs to raise awareness of U.S. blueberry availability at the wholesale distribution level.

She added that although U.S. agricultural exports still face higher tariffs than other global suppliers in China, the organization is hopeful that importer tariff exemption requests will continue to be promptly reviewed and approved by the Chinese government.

Meanwhile, Cort Brazelton, co-CEO of Fall Creek Farm and Nursery, said of the market access: "It is exciting, but it could have been more exciting five or ten years ago when there were windows of greater undersupply, particularly in the spring months, which could have been to the benefit of California and Southeastern states."

He therefore expects the biggest opportunity for U.S. blueberry growers to come in the latter stages of the season. In addition to Chinese domestic supplies being lower then, the crop is vulnerable to adverse weather events which can impact quality.

"It seems there is an undersupply of quality fruit in August and September in China," he said.

However, logistical issues will likely be a challenge for an industry that is so heavily focused on the domestic U.S. market.

"It's going to be a challenge. Businesses, fields, infrastructure, packhouses, cooling facilities and varieties are generally designed for a domestic market, built around trucking and with naturally shorter shelf-life requirements. That does not directly transfer to a long-distance maritime export business," he said. "It's not cut and paste. And airfreight is simply going to be too expensive to allow anything at scale to happen.

"So this access is an opportunity for the industry, for those who want to dedicate the time and attention to managing the complexity of exports. This is something

exporting countries distant from the market have had to develop over many years. The good news about China is anybody who delivers on quality will find a market that wants their product and is willing to pay for quality."

Lessons from Chile

One of the most distant suppliers of fresh blueberries to China is Chile, which has gained a solid foothold in the market over its decade of exporting.

The country's biggest blueberry exporter to China is Prize, which last season sent half of all overseas shipments - some 2,000 metric tons - to the destination.

Alejandro García-Huidobro, the company's general manager and founder, said it is vital that the U.S. understands the unique market and its requirement of sweet and crunchy fruit of high quality and condition.

"Those who know Chinese consumers well understand that there the only way to be successful is by sending the best quality fruit and making the consumer repeat the purchase," he said.

"Blueberry penetration in China is one of the lowest in the world, which is why it is so important that we build the habit of consuming the best blueberries. In contrast to other markets where blueberries are consumed mixed with other products or in preparations, in China the fruit is eaten by itself, without accompaniments, so the product must be good to please the end consumer," he said.

In addition, if sub-par blueberries are sent - such as fruit that is too acidic - that can have wide-reaching market impacts on demand and prices, he said.

Prize has made significant investments in packing capacity with high-quality machines, the latest generation cold chain technology in its packing facilities, on its production sites and in its breeding program, all of which have helped it to be successful in China.

Asked what advice he would give to U.S. blueberry companies looking to send fruit to China, García-Huidobro said: "I would tell them to only export if they have a very good distributor or retail partner in China, only the best quality and the best varieties, and to follow the demands of the Chinese consumers."

"As the U.S. season takes place during the same period as the Chinese season, they will have strong price competition. So if it's not a product that is truly superior in quality to the local Chinese product, it's probably not worth sending it."

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EXHIBIT 34

ENTIRE EXHIBIT NOT SUSCEPTIBLE TO PUBLIC SUMMARY

EXHIBIT 35

Calculate volume of generic and branded foods per weight

food weight to volume conversions

with calories and nutrients calculator

Enter weight, select a unit of weight, and specify a food to search for. Use * as a wildcard for partial matches, or enclose the search string in double quotes for an exact match. The food database includes both generic and branded foods.

Weight: 7000 in: kilogram Food category: generic and branded

blueberries, raw

Select a food: Blueberries, raw

precision: 2

V2W | W2V | Density | Calories | Price

☑ show all units

Volume, i.e. how many spoons, cups, gallons or liters in 7000 kilogram of Blueberries, raw

centimeter³	11 189 984.18	milliliter	11 189 984.18
foot³	395.17	US cup	47 297.3
Imperial gallon	2 461.45	US dessertspoon	1 513 513.51
inch³	682 854.73	US fluid ounce	378 378.38
liter	11 189.98	US gallon	2 956.08
meter³	**11.19**	US pint	23 648.65
metric cup	44 759.94	US quart	11 824.32
metric dessertspoon	1 118 998.42	US tablespoon	756 756.76
metric tablespoon	745 998.95	US teaspoon	2 270 270.27
metric teaspoon	2 237 996.84		

☐ show all units

Weight

gram	7 000 000	ounce	246 917.73
kilogram	**7 000**	pound	15 432.36

See how many nutrients in 7000 kg (15432.36 lbs) of Blueberries, raw

Nutrient (find foods rich in **nutrients**)	Unit	Value / 7000000 g
Proximates		
Water	g	5894700
Energy	kcal	3990000
Energy	kJ	16800000
Protein	g	51800
Total lipid (fat)	g	23100
Ash	g	16800
Carbohydrate, by difference	g	1014300
Fiber, total dietary	g	168000
Sugars, total including NLEA	g	697200
Sucrose	g	7700
Glucose (dextrose)	g	341600

See how many calories in 7000 kg

Carbohydrate	3 651 480	15 277 792.32
Fat	193 347	808 963.85
Protein	174 048	728 216.83
Other	0	0
Total	4 018 875	16 814 973

About Blueberries, raw

156.38985 grams [g] of Blueberries, raw fill 1 metric cup

5.22055 ounces [oz] of Blueberries, raw fill 1 US cup

Blueberries, raw weigh(s) 156.39 gram per (metric cup) or 5.22 ounce per (US cup), and contain(s) 57.41 calories per 100 grams or ≈3.527 ounces [weight to volume | volume to weight | price | density]

Food category: Fruits and Fruit Juices

A few foods with a name containing, like or similar to **Blueberries, raw:**

Blueberries, wild, raw (Alaska Native) contain(s) 61 calories per 100 grams or ≈3.527 ounces [price]

NUTS and BERRIES TRAIL MIX, RAW ALMONDS and FANCY CASHEWS, DRIED BLUEBERRIES and CRANBERRIES, ROASTED SUNFLOWER KERNELS, UPC: 888670051528 contain(s) 500 calories per 100 grams or ≈3.527 ounces [price]

About this page: Calculate volume of generic and branded foods per weight

Volume of the selected food item is calculated based on the food density and its given weight. Visit our food calculations forum for more details.

Reference (ID: 2874)

U.S. Department of Agriculture, Agricultural Research Service. FoodData Central. Last accessed: 29 August 2020 (fdc.nal.usda.gov).

X

X

EXHIBIT 36

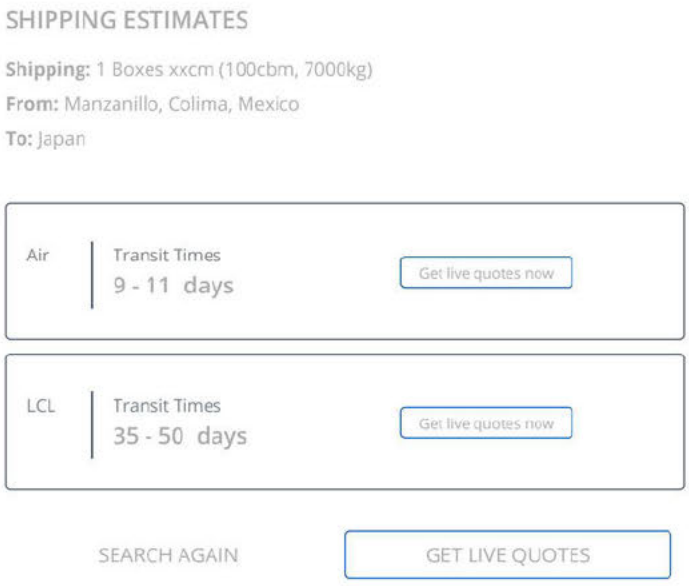
Transit Time Calculator for Sea & Air Transit Times

What Is Transit Time In Shipping

Transit time is how long it takes for a shipment to be delivered at it's final destination after it has been picked up from a designated pick up point. The amount of time required to move goods from one point to another varies widely, so it's important to get this information before booking a shipment.

Instantly Estimate FCL, LCL, Air, Sea and Trucking Freight Shipping Transit Time

This shipping time calculator returns estimated shipping times for multi-modal global shipping along selected lanes. Simply enter the address, city, zip code or country of the origin and destination, as well as the load type, to see the general transit time ranges and estimated delivery.



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About the International Shipping Time Calculator

International freight is complicated, particularly when choosing between different shipping modes.

This international freight shipping transit time calculator gives estimated shipping time for blended inland trucking, air and ocean freight, to give a comprehensive freight shipping time estimate.

And if you're ready to ship, head over to the Freightos Marketplace to find and book the perfect shipment in seconds, complete with accurate transit time projections.

How long does freight shipping take?

Freight shipping transit time is impacted by factors including distance, shipping mode, route, and season. In very rough estimates: express can take as little as 1-3 days, air freight is typically 5-10 days, and sea shipping can range anywhere from 20-45 days.

Shipping Time Calculated By Sea

Why is there such a wide range in shipment duration when shipping by sea? Because there are a lot of ways to ship. Seriously.

There are about 107,000 different UN Codes for Trade and Transport Locations (UN/LOCODE) for different shipping destinations. Which means variance, like the fact that shipping time for an ocean shipment from Shenzhen, China, to Miami, Florida through the Suez Canal takes 41 days while the (more expensive) Panama Canal takes only 35 days.

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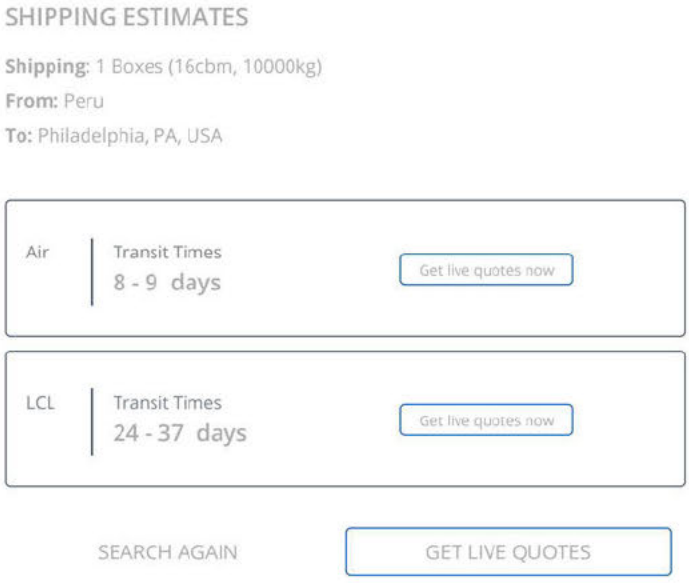

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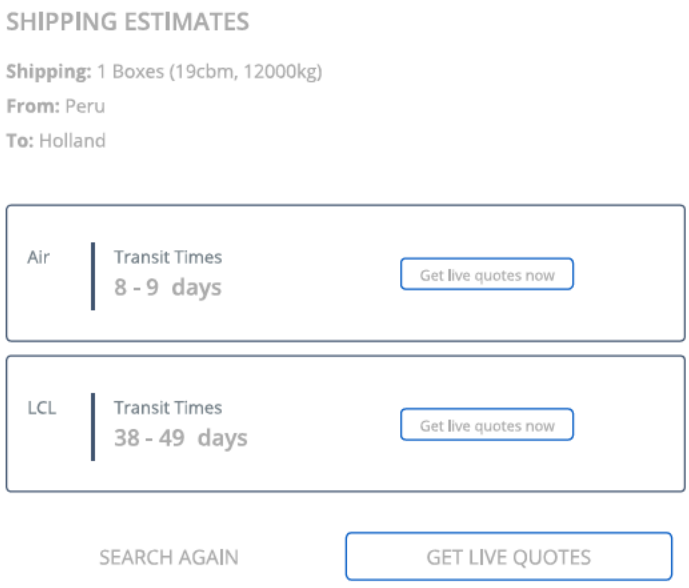

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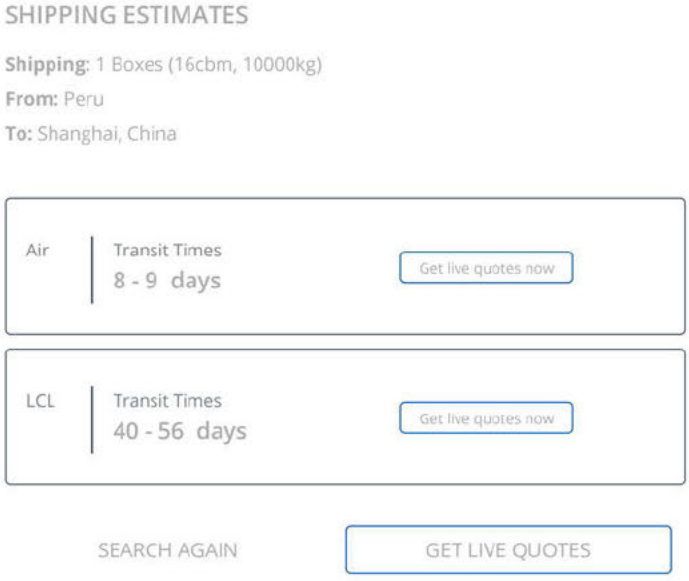

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EXHIBIT 40

Argentine blueberry industry concerned about air freight shortage ahead of season

May 25, 2020

With the Argentine blueberry export harvests due to kick off in August, the industry is concerned about the potential shortage of air freight capacity.

The Argentine Government has canceled all commercial flights until Sept. 1, which could cause problems for the early fruit.

"Last year in August, Argentina shipped 50% of production via air freight and 50% by sea freight," Argentine Blueberry Committee president Federico Baya told FreshFruitPortal.com.

"That 50% that is sent by air freight is what will likely be affected by the measures."

Baya and Alejandro Pannunzio of the Mesopotamia industry body are in talks with national airline Aerolineas Argentinas to try and secure flights for the season's initial exports and guarantee the flow of the fruit to overseas markets.

"We're sure that we're going to have their collaboration to be able to supply destinations that are demanding our fruit."

Argentine typically exports around 16,000 metric tons (MT) of blueberries, with almost all going to the U.S., the U.K. and Europe. Harvests for the local market begin in June.

Although Argentina's blueberry industry is concerned over logistical aspects of the upcoming season, something that it's pleased about is the demand spike for fruits around the world, and especially blueberries.

"Blueberries are being revitalized especially in the U.S., a country with more than 300 million people and an average annual consumption of 800 grams per person," Baya said.

Pannunzio added that consumption is also rising in Europe.

"So the market is definitely there. The question is how much consumers will be willing to pay is the big question," he said.

The representatives added that Argentina blueberry companies have implemented new protocols to protect workers amid the Covid-19 pandemic.

25/05/2020

Freshfruitportal.com

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EXHIBIT 41

LifeSpan® for Blueberries

LifeSpan® Modified Atmosphere Packaging (MAP)

LifeSpan® box liners are an innovation in post-harvest packaging that extend the storage and marketing life of fresh produce. Used commercially for over 15 years, LifeSpan® is a global leader in MAP products and is now an important packaging component for many of the worlds leading fresh produce exporters.

LifeSpan® for Blueberries

LifeSpan® is proven to maintain harvest fresh condition of blueberries for up to 2 months post harvest. Commercial applications using LifeSpan® products include premium quality storage to extend local marketing seasons and long distance distribution of blueberries.

How it works

LifeSpan® MAP Packaging allows the creation of a low oxygen (O_2), high carbon dioxide (CO_2), atmosphere inside a liner. The oxygen and carbon dioxide permeability of the LifeSpan® blueberry product is specifically designed for the respiration rate of blueberries. The modified atmosphere created will significantly reduce the respiration rate of the fruit with the following benefits.

Benefits for Blueberries

- Slows senescence and substantially reduces the incidence of berry breakdown
- Maintains firmness
- Maintains bloom on the berries
- Suppresses the onset and development of botrytis and other rots or moulds

LifeSpan® box liners for Blueberries have proven very effective for export shipping, maintaining blueberries in harvest fresh condition while offering greater flexibility and performance over traditional CA containers.

LifeSpan®

Modified Atmosphere Packaging

amcor

Contacts

For more information, visit www.amcor.com/lifespan
or email lifespan@amcor.com

T +61 9556 7666 **F** +61 9532 5385

LifeSpan® for Blueberries

LifeSpan® Experience with Blueberries

LifeSpan® products have been used to pack blueberries in Australia, Chile, USA, Canada, Argentina and South Africa. Box liners have been used for storage and export creating new market opportunities and extending local marketing seasons for may years.

Now LifeSpan® box liners are being used for sea freight exports from the Southern Hemisphere growing regions to Northern Hemisphere markets. Blueberries arrive in excellent condition and with carbon dioxide levels that are controlled to prevent damage to the blueberries whilst suppressing rot growths.

The LifeSpan® Range for Blueberries

LifeSpan® box liners maintain blueberries in premium condition, and are fast and simple to pack using the patented clip system. LifeSpan® box liners are just as effective when heat sealed.

LifeSpan® Film Technology

LifeSpan® uses superior moisture release film technology, minimising berry moisture loss while allowing condensation to breathe through the liner. This maximises berry freshness while minimising condensation related problems common with standard polyethylene films.

Passive or Active Modification

Creation of Elevated Carbon Dioxide is achieved either by gas flushing or by allowing the on-going respiration of the blueberries to cause a build up of CO_2. Natural build up will take 10–14 days to reach the final equilibrium level. Gas flushing achieves a similar result as soon as the pallet shroud is flushed. No significant difference in storage performance has been observed between the two different options.

LifeSpan®

Modified Atmosphere Packaging

amcor

Contacts

For more information, visit www.amcor.com/lifespan
or email lifespan@amcor.com

T +61 9556 7666 **F** +61 9532 5385

EXHIBIT 42

CBI
Ministry of Foreign Affairs

(/)

≡ Menu

Takes 18 minutes to read

Blueberries in Europe have become popular as a healthy and easy-to-snack fruit. Consumers in the United Kingdom and Germany are especially fond of blueberries. Regional differences in consumption predicts further growth of blueberries throughout Europe. The growing demand is being met by an enormous increase in supply, so as a supplier it is important to monitor supply and demand carefully.

Contents of this page

1. Product description

Blueberries are part of the genus *Vaccinium*. The main types of blueberries are highbush, lowbush, rabbiteye and half-high hybrid varieties. The most common blueberry for commercial cultivation is the (northern) highbush type. There are many varieties of blueberries each with their own characteristics in terms of size, growing season, flavour and cold hardiness.

Other berries that are found within the genus *Vaccinium* are cranberries, cowberries and bilberries, a European variety that is similar to the blueberry.

In this factsheet we will use the statistics of all the *Vaccinium* varieties. The main imported berries of this variety are blueberries, and it is possible that these are registered under different sub-codes.

Harmonized System (HS) code	08104000 Cranberries, bilberries and other fruit of the genus *Vaccinium*
Harmonized System (HS) code Sub-classification	• 08104050 Fresh fruit of species *Vaccinium macrocarpum* and *Vaccinium corymbosum* (American blueberry and cranberry) • 08104030 Fresh fruit of species *Vaccinium myrtillus* (European blueberry or bilberry) • 08104010 Cowberries, foxberries or mountain cranberries (fruit of the species *Vaccinium vitis-idaea*) • 08104090 Other (possibly including blueberries among others)
Types of blueberries	• Northern highbush (*Vaccinium corymbosum*) • Southern highbush (*Vaccinium darrowii*) • Lowbush or wild blueberries (*Vaccinium angustifolium*) • Rabbiteye (*Vaccinium virgatum*) • half-high hybrids
Cultivars commercial varieties	Many different varieties are used depending on local climate and circumstances, early & late season coverage and characteristics.

2. What makes Europe an interesting market for blueberries?

Blueberries have been expanding fast in Europe and a growing supply will continue to push the consumption of blueberries. The unused potential makes Europe an interesting market, but you must be aware of market speculation and overproduction.

COVID-19 has had no negative effect on demand

Blueberries are a typical retail fruit in Europe and they also score well as a healthy snack. So the impact of the COVID-19 pandemic has been minimal. The main obstacle in the supply chain have been the lockdowns and the low availability of resources in the producing countries, mainly

resulting in delays. As an exporter, if you are able to manage your production, packing and logistics well, you can continue to supply the European market.

Tip:

✓ Read the suggestions of British Columbia Blueberry Council on how to keep your business environment safe during the COVID-19 pandemic.

Blueberries still going strong in supply and demand

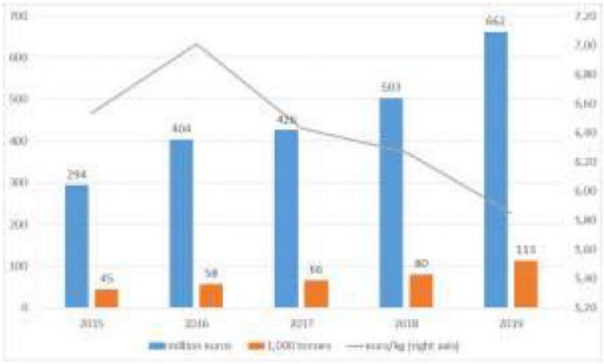
The European blueberry market has expanded rapidly over the past years. Both demand and supply are expected to continue to grow, although nobody knows its true potential. Suppliers can take advantage of the strong demand, but at the same time must count on prices slowly declining due to increasing availability of blueberries worldwide.

Europe's import of blueberries has increased from 45,000 tonnes in 2015 to 113,000 tonnes in 2019. From 2018 to 2019 the import volume jumped by a whopping 41%. The supply side is looking for the boundaries of the European potential. Inevitably this has affected the product value. The average price trade price of blueberries has been in a downward trend since 2016.

Until now, the fast-expanding imports of blueberries into Europe could be contributed to the greater supply volumes from mainly Chile, Peru and Morocco. But new planting and production has been on the rise everywhere, counter-seasonal as well in and around Europe: in Spain and Poland, in the Ukraine, Serbia and Morocco and further away.

Despite the ever-increasing supply and lower average prices, Europe continues to import more blueberries every year. According to Rabobank's reporting, there will be opportunities for value-added supplies and cost-competitive firms. Yet the demand for high quality is also increasing, so simply focusing on supplying commodity blueberries may not be enough.

Figure 1: European imports of fresh vaccinium berries (mainly blueberries)



Source: Eurostat / Market Access Database

Differences in consumption point to further expansion

Differences in consumption rates indicate that there is still a margin for further expansion in several European regions. But as a supplier it is important not to overestimate the market and secure your sales with steady buyers.

Global differences in consumption

Both on a global and European level there are large differences in blueberry consumption. A rough calculation based on production, import-export volumes and news sources points out that Europe is still far behind the United States and Canada (Table 1). Based on the current consumption estimates in the United States and Canada it is safe to assume that you will see the blueberry market expand further in Europe in the next several years.

European differences in consumption

Within Europe there are significant differences in consumption too. The United Kingdom leads the consumption in Europe with an estimated 0.8 kg per capita, which is more than double the European average. The International Blueberry Organization (IBO) notices strong demand in northern Europe such as the United Kingdom, but also sees great opportunities for growth in countries such as Spain, France and in the Eastern part of Europe.

Enthusiasm motivates the market

There is great enthusiasm for the European market and professionals see huge potential in blueberries when the demand throughout the region will match the higher consumption levels of the countries where blueberries are the most popular. However, the time that countries need to reach these levels is uncertain and the maximum potential can only be based on speculation.

Estimates vary, but according to the blueberry breeder Fall's Creek it could be close to 860 g per person by 2026. This calculates to a total need of between 500,000 and 600,000 tonnes of blueberries. Based on current growth it is safe to assume that Europe can absorb an additional supply of 80,000 up to 150,000 tonnes from abroad five years from now, which is double the current demand. Global production volumes and retail promotions will determine how much blueberries will finally be sold in the market.

Table 1: Estimates of annual consumption per capita

China	0.0037 kg
Europe	0.2-0.3 kg
United States	1.2-1.5 kg
Canada	2.5-3.5 kg

Tips:

- ✓ Stay up to date with market developments by subscribing to newsletters and following market updates from Freshplaza, Fruitnet, the International Blueberry Organization and FreshFruitPortal or other news sites.
- ✓ Participate in international berry congresses to get better insights into the blueberry industry, for example the Global Berry Congress or the International Blueberry Organization's (IBO) Summit.
- ✓ Make sure to have excellent commercial connections for your product before investing in blueberries. In Europe you can find and meet potential partners and buyers on the Fruit Logistica trade fair. Think twice when starting new plantations. The increasing volumes make the market nervous, so it is better to focus on existing orchards or varietal renewal.
- ✓ Read about how to do business with European buyers (https://www.cbi.eu/market-information/fresh-fruit-vegetables/doing-business/) on the CBI market intelligence platform.

3. Which European countries offer most opportunities for blueberries?

Germany and the United Kingdom are the leading markets for blueberries, although the United Kingdom is closest to reaching maturity. A large and increasing part of the European supply is traded (and packed) in the Netherlands. Local production can also be a motivation to increase imports outside of the local season, which can be seen in Spain and Poland. In other parts of Europe, including France and Eastern Europe, there is untapped potential for blueberries.

Figure 2: Main European importing countries of fresh vaccinium berries (mair

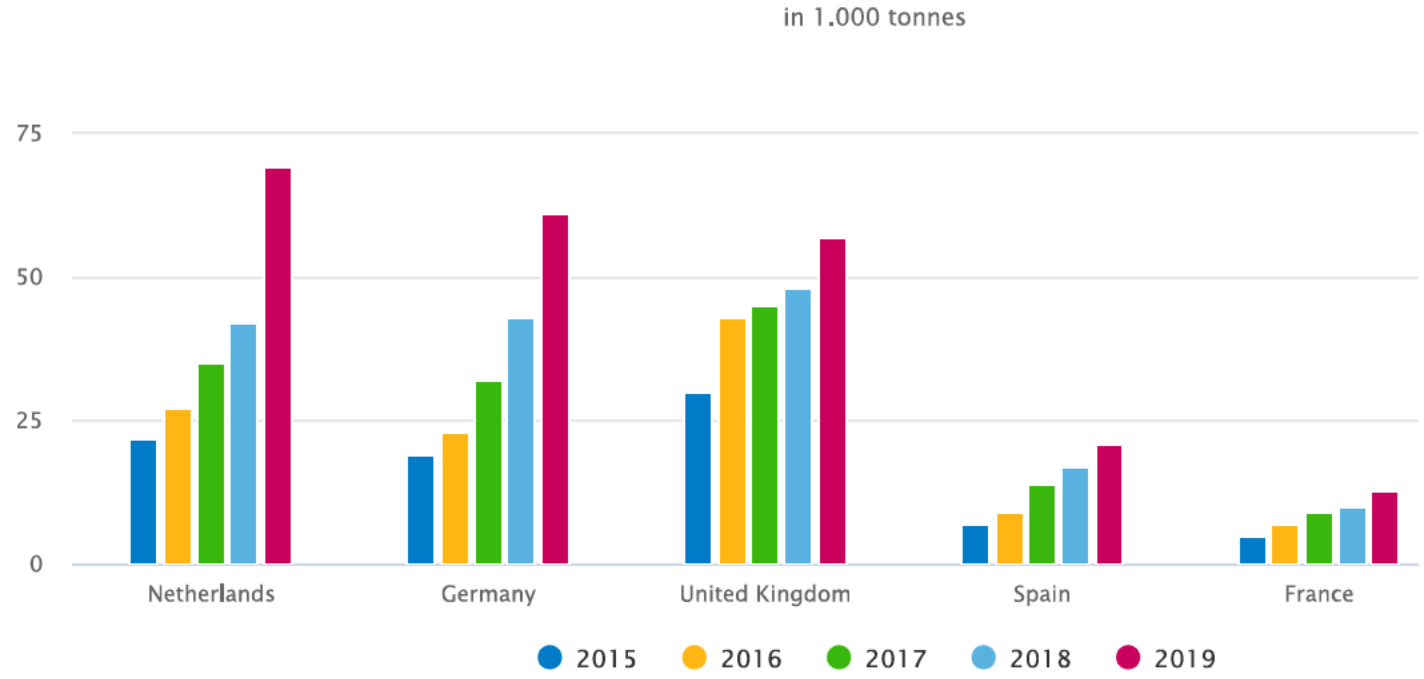


Table 2: Blueberry production in Europe in 1000 tonnes

	2015	2016	2017	2018	2019
European Union - 28 countries	n.a.	66.92	86.48	106.42	129.73
Spain	21.06	24.95	35.36	43.52	53.38

Poland	14.10	14.72	16.34	25.30	34.77
Germany	11.95	10.71	13.81	12.76	14.85
Netherlands	7.37	7.70	8.30	9.30	11.06
Portugal	4.44	6.57	9.84	11.06	10.78
Austria	0.84	0.66	0.89	1.42	1.35

Source: Eurostat

The Netherlands: a good place for the distribution of blueberries

The Netherlands became the largest importer of blueberries in 2019, although most were distributed outside the country. It is an important market when you are looking for an easy way to supply several European markets.

The Dutch market has grown together with the increasing European demand. With 69,000 tonnes of imported blueberries in 2019 (see Figure 2) and another 11,000 tonnes from its national production (see Table 2), the Netherlands was able to supply European clients with 55,000 tonnes. Although most were re-exported to Germany; note that Belgium, United Kingdom, Poland and Scandinavia are important destinations to reach via the Netherlands as well. The rest was absorbed by the Dutch consumption or processing industry.

Among Dutch consumers blueberries have become the most popular soft fruit after strawberries, which are being produced locally on a large scale. The Dutch market for blueberries relies more on imports, but is equally price competitive. Supermarkets offer attractive blueberry promotions to their customers and have increased their sales with 350% between 2013 and 2017 .

Competition from Dutch growers is expected to increase between July and mid-September, as growers are stretching their seasons with different varieties and cooperative structures , trying to compensate for their high production costs. Nevertheless, the Netherlands will remain an important re-exporter of blueberries throughout most of the year.

Tip:

✓ Make use of Dutch traders when you have difficulties in entering different European markets – find a selection of importers on the website of the fruit and vegetable association Groentenfruithuis. Dutch importers often have wide experience in trading and are familiar with the different European preferences. Dutch fruit companies have a no-nonsense mentality, so calling or visiting them often works better than e-mailing.

Germany: most potential for blueberry consumption growth

With its high and fast-growing volume, Germany is the country with the most potential for blueberries in Europe at the moment, but requirements can be strict. Suppliers that are price competitive and able to deal with the required quality standards can find an attractive market in Germany.

Last year (2019) Germany overtook the United Kingdom in import volume. Germany's blueberry imports increased from 19,000 tonnes in 2015 to 61,000 tonnes in 2019. German growers added another 15,000 tonnes to the imports. And Germany is also the main destination for frozen berries, with a 17% share in Europe.

Most blueberries come from Spain (almost 22,000 tonnes) and Germany itself. Retailers prefer to source blueberries from nearby with the guarantee of a clean and sustainable production. Locally produced blueberries are often organic certified. But Germany is also a price-conscious market and this makes buyers shift to more economic sources when available, such as Morocco. In the off-season Peru and Chile (often shipped through the Netherlands) take over most of the supply.

Tip:

✓ Expect to put extra effort into product documentation and certification (GlobalGAP, IFS, organic) to supply the German market. You can best focus on clean and cheap or adding extra value by supplying organic blueberries.
