



DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-200]

Methylene Diphenyl Diisocyanate from the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: The U.S. Department of Commerce (Commerce) determines that methylene diphenyl diisocyanate (MDI) from the People's Republic of China (China) is being, or is likely to be, sold in the United States at less than fair value (LTFV) for the period of investigation July 1, 2024, through December 31, 2024.

DATES: Applicable [Insert date of publication in the *Federal Register*].

FOR FURTHER INFORMATION CONTACT: Christopher Maciuba or Kayden Jenson, AD/CVD Operations, Office II, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-0413 or (202) 482-0967, respectively.

SUPPLEMENTARY INFORMATION:

Background

On September 16, 2025, Commerce published in the *Federal Register* its preliminary affirmative determination in the LTFV investigation of MDI from China, in which it also

postponed the final determination until January 29, 2026.¹ We invited interested parties to comment on the *Preliminary Determination*.²

Due to the lapse in appropriations and Federal Government shutdown, on November 14, 2025, Commerce tolled all deadlines in administrative proceedings by 47 days.³ Additionally, due to a backlog of documents that were electronically filed via Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS) during the Federal Government shutdown, on November 24, 2025, Commerce tolled all deadlines in administrative proceedings by an additional 21 days.⁴ Accordingly, the deadline for this final determination is now April 7, 2026.

For a complete description of the events that occurred since the *Preliminary Results*, see the Issues and Decision Memorandum.⁵ The Issues and Decision Memorandum is a public document and on file electronically via ACCESS. ACCESS is available to registered users at <https://access.trade.gov>. In addition, a complete version of the Issues and Decision Memorandum can be accessed directly at <https://access.trade.gov/public/FRNoticesListLayout.aspx>.

Scope of the Investigation

The product subject to this investigation is MDI from China. For a complete description of the scope of this investigation, see Appendix I.

Scope Comments

In the Preliminary Scope Memorandum, we set aside a period of time for parties to raise issues regarding product coverage (*i.e.*, scope) in scope-specific case briefs or other written

¹ See *Methylene Diphenyl Diisocyanate from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less-Than-Fair-Value, Postponement of Final Determination, and Extension of Provisional Measures*, 90 FR 44629 (September 16, 2025), and accompanying Preliminary Decision Memorandum.
² *Id.*

³ See Memorandum, "Deadlines Affected by the Shutdown of the Federal Government," dated November 14, 2025.

⁴ See Memorandum, "Tolling of all Case Deadlines," dated November 24, 2025.

⁵ See Memorandum, "Issues and Decision Memorandum for the Final Affirmative Determination in the Less-Than-Fair-Value Investigation of Methylene Diphenyl Diisocyanate from the People's Republic of China," dated concurrently with, and hereby adopted by, this notice (Issues and Decision Memorandum).

comments. No interested party submitted scope comments; therefore, we have made no modifications to the scope language as it appeared in the *Initiation Notice*. See Appendix I.

Verification

The mandatory respondent in this investigation is not eligible for a separate rate and is therefore part of the China-wide entity. Because Commerce has found the China-wide entity to be uncooperative, Commerce did not conduct verification.

Analysis of Comments Received

All issues raised in the case and rebuttal briefs submitted by interested parties in this investigation are addressed in the Issues and Decision Memorandum. A list of the issues addressed in the Issues and Decision Memorandum is attached to this notice at Appendix II.

Changes Since the *Preliminary Determination*

Since the *Preliminary Determination*, we have made certain changes to the estimated weighted-average dumping margin for the China-wide entity and the estimated weighted-average dumping margin for non-examined companies that are eligible for a separate rate. For a discussion of these changes, see the Issues and Decision Memorandum.

China-Wide Entity and Use of Adverse Facts Available (AFA)

Consistent with the *Preliminary Determination*,⁶ Commerce continues to find that, pursuant to sections 776(a) and (b) of the Tariff Act of 1930, as amended (the Act), the use of facts otherwise available, with adverse inferences, is warranted in determining the estimated weighted-average dumping margin for the China-wide entity.⁷ For this final determination, there is no new information on the record that would cause us to reconsider our preliminary decision to apply AFA to the China-wide entity. Further, we calculated a new dumping margin based on the lowest U.S. price, factors of production (FOPs) information and certain surrogate values (SVs)

⁶ See *Methylene Diphenyl Diisocyanate from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less-Than-Fair-Value, Postponement of Final Determination, and Extension of Provisional Measures*, 90 FR 44629 (September 16, 2025) (*Preliminary Determination*), and accompanying Preliminary Decision Memorandum (PDM) at 9-11.

⁷ *Id.*

from the Petition, and other SVs submitted to the record in this investigation.⁸ Therefore, as AFA, we assigned the estimated weighted-average dumping margin of 159.04 percent to the China-wide entity.⁹

Separate Rate

We preliminarily granted a separate rate to certain companies that we did not select for individual examination. No party commented on Commerce's preliminary decision to grant a separate rate to Covestro Polymers (China) Co., Ltd. or Shandong Mingko Co., Ltd.; therefore, we continue to find that these two companies are eligible for a separate rate. Additionally, we preliminarily determined that the mandatory respondent, Wanhua,¹⁰ is not eligible for a separate rate. Wanhua commented on Commerce's preliminary decision not to grant it a separate rate.¹¹ We have addressed this comment in the Issues and Decision Memorandum. We have made no changes to Commerce's preliminary separate rate eligibility determinations for the non-selected separate rate companies for this final determination.

As the basis for the estimated weighted-average dumping margin for the non-examined producer/exporter combinations eligible for a separate rate in this final determination, we calculated new dumping margins based on all of the U.S. prices, FOPs and certain SVs included in the Petition along with other SVs submitted to the record of this investigation.¹²

⁸ See Memorandum, "China-Wide Rate and Separate Rate for Final Determination," dated April 7, 2026; see also Issues and Decision Memorandum at Comment 5.

⁹ See Issues and Decision Memorandum at Comment 5.

¹⁰ Commerce determined that Wanhua Chemical (Singapore) Pte. Ltd. (Wanhua Singapore), Wanhua Chemical (Ningbo) Trading Co., Ltd. (Wanhua Ningbo), Wanhua Chemical (Fujian) Co., Ltd. (Wanhua Fujian), Wanhua Chemical (Fujian) Isocyanate Co., Ltd. (Wanhua Isocyanate), Wanhua Chemical (Guangdong) Co., Ltd. (Wanhua Guangdong), and Wanhua Chemical (Yantai) Trading Co., Ltd. (Wanhua Yantai), Wanhua Chemical Group Co., Ltd. (Wanhua Group), and Wanhua Chemical (Ningbo) Co., Ltd. (Ningbo Company)} should be collapsed and treated as a single entity (Wanhua). See Memorandum, "Preliminary Determination of Affiliation and Single Entity Determination for Wanhua Chemical (Singapore) Pte. Ltd., and Wanhua Chemical (Ningbo) Trading Co., Ltd.," dated August 19, 2025; and *Preliminary Determination* PDM at 4-5. We received no comments on this preliminary determination; thus, we continue to treat Wanhua Chemical (Singapore) Pte. Ltd. (Wanhua Singapore), Wanhua Chemical (Ningbo) Trading Co., Ltd. (Wanhua Ningbo), Wanhua Chemical (Fujian) Co., Ltd. (Wanhua Fujian), Wanhua Chemical (Fujian) Isocyanate Co., Ltd. (Wanhua Isocyanate), Wanhua Chemical (Guangdong) Co., Ltd. (Wanhua Guangdong), and Wanhua Chemical (Yantai) Trading Co., Ltd. (Wanhua Yantai), Wanhua Chemical Group Co., Ltd. (Wanhua Group), and Wanhua Chemical (Ningbo) Co., Ltd. (Ningbo Company)) as a single entity (Wanhua) for purposes of this final determination.

¹¹ See *Preliminary Determination* at "Separate Rates" section.

¹² See Memorandum, "China-Wide Rate and Separate Rate for Final Determination," dated April 7, 2026.

Combination Rates

Consistent with the *Preliminary Determination*, Commerce determined combination rates for the companies eligible for a separate rate.

Final Determination

Commerce determines that the following estimated weighted-average dumping margins exist for the period July 1, 2024, through December 31, 2024:

Producer	Exporter	Estimated Weighted-Average Dumping Margin (percent)
Covestro Polymers (China) Co., Ltd.	Covestro Polymers (China) Co., Ltd.	85.11
Wanhua Chemical Group Co., Ltd	Shandong Mingko Co., Ltd	85.11
China-Wide Entity		159.04*

* This rate is based on facts available with adverse inferences.

Disclosure

Commerce intends to disclose the calculations performed in connection with this final determination to interested parties within five days after public announcement of the final determination or, if there is no public announcement, within five days of the date of publication of the notice of final determination in the *Federal Register*, in accordance with 19 CFR 351.224(b).

Suspension of Liquidation

In accordance with section 733(d)(2) of the Act, we instructed U.S. Customs and Border Protection (CBP) to suspend liquidation of entries of subject merchandise, as described in Appendix I of this notice, that were entered, or withdrawn from warehouse, for consumption on or after September 16, 2025, the date of publication of the *Preliminary Determination* in the *Federal Register*. In accordance with section 733(d) of the Act, we subsequently instructed CBP to discontinue the suspension of liquidation of all entries of subject merchandise entered or withdrawn from warehouse, on or after March 16, 2026, but to continue the suspension of liquidation of all entries of subject merchandise on or before March 15, 2025.

If the U.S. International Trade Commission (ITC) issues a final affirmative injury determination, then we will issue an antidumping duty (AD) order, reinstate the suspension of liquidation, and require a cash deposit for estimated antidumping duties, in accordance with section 736(a) of the Act, effective on the publication date of the ITC's final affirmative determination in the *Federal Register*. The cash deposit required will be, as follows: (1) for the exporter and producer combinations listed in the table above, the cash deposit rate will be the rate identified in this final determination; (2) for all combinations of Chinese exporters and producers of subject merchandise, the cash deposit rate will be the cash deposit rate established for the China-wide entity; and (3) for all non-Chinese exporters of subject merchandise that have not received their own separate rate above, the cash deposit rate will be the cash deposit rate applicable to the Chinese exporter/producer combination that supplied that non-Chinese exporter.

If the ITC determines that material injury, or threat of material injury, does not exist, this proceeding will be terminated, and all cash deposits for estimated antidumping duties will be refunded and the suspension of liquidation will be lifted.

ITC Notification

In accordance with section 735(d) of the Act, Commerce will notify the ITC of its final affirmative determination of sales at LTFV. Because Commerce's final determination is affirmative, in accordance with section 735(b)(2) of the Act, the ITC will make its final determination as to whether the domestic industry in the United States is materially injured, or threatened with material injury, by reason of imports, or sales (or the likelihood of sales) for importation, of MDI no later than 45 days after this final determination. If the ITC determines that material injury or threat of material injury does not exist, this proceeding will be terminated, all cash deposits will be refunded or canceled, and suspension of liquidation will be lifted. If the ITC determines that such injury does exist, Commerce will issue an AD order directing CBP to assess, upon further instructions by Commerce, antidumping duties on all imports of the subject

merchandise that are entered, or withdrawn from warehouse, for consumption on or after the effective date of the suspension of liquidation, as discussed above in the “Suspension of Liquidation” section above.

Administrative Protective Order (APO)

This notice serves as the only reminder to parties subject to an APO of their responsibility concerning the disposition of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3). Timely written notification of the return or destruction of APO materials or conversion to judicial protective order is hereby requested. Failure to comply with the regulations and terms of an APO is a sanctionable violation.

Notification to Interested Parties

This final determination is issued and published in accordance with sections 735(d) and 777(i) of the Act, and 19 CFR 351.210(c).

Dated: April 7, 2026.

Christopher Abbott,
*Deputy Assistant Secretary
for Policy and Negotiations,
performing the non-exclusive functions and duties
of the Assistant Secretary for Enforcement and Compliance.*

Appendix I

Scope of the Investigation

The merchandise subject to this investigation is methylene diphenyl diisocyanate (MDI), which is an aromatic polyisocyanate material whose composition includes two or more isocyanate groups (*i.e.*, functional group containing a nitrogen atom, a carbon atom, and an oxygen atom bonded together (-NCO)) attached to one or more benzene rings (*i.e.*, flat, symmetrical molecule made up of six carbon atoms arranged in a hexagonal ring and has the chemical formula C₆H₆) that are joined by methylene bridges (*i.e.*, a carbon atom bound to two hydrogen atoms (-CH₂-) and connected by single bonds to two other distinct atoms in the rest of the molecule). MDI is commonly called Polymeric, Monomeric, or Modified MDI and may also be referred to under other names, including Methylene bisphenyl isocyanate, 4,4'-Diphenylmethane diisocyanate, Methylene di-p-phenylene ester of isocyanic acid, Methylene bis(4-phenyl isocyanate), and polymethylene polyphenylene isocyanate. MDI is normally associated with Chemical Abstracts Service (CAS) registry numbers 9016-87-9, 101-68-8, 5873-54-1, 2536-05-2, 1689576-89-3, 25686-28-6, 26447-40-5, and 39310-05-9, but several others are also used.

MDI ranges in physical form from low viscosity liquids to solids. MDI is covered by the scope of this investigation irrespective of whether it has gone through a distillation process and regardless of acid content, reactivity, functionality, freeze stability, physical form, viscosity, grade, purity, molecular weight, or packaging.

MDI may contain additives, such as catalysts, solvents, plasticizers, antioxidants, fire retardants, colorants, pigments, diluents, thickeners, fillers, softeners, toughening agents. The scope does not include mixtures of MDI with other materials, when the combined MDI component comprises less than 40 percent of the total weight of the mixture.

MDI may be partially reacted with itself, polyol, or polyamines, and retain MDI component that has not fully chemically reacted so as to convert it into a different product no longer containing isocyanate groups. These products are known as homopolymer, uretonimine MDI, carbodiimide MDI, or prepolymers. The scope does not include partially reacted MDI when its NCO content is less than 10 weight percentage.

For MDI that enter as part of a system with separately packaged resin consisting mostly of a chemical compound that has an OH reactive group, including polyol, only the MDI portion of the system is included in the scope. The scope does not include any separately packaged polyol that would not fall within the scope if entered on its own.

The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing or removing additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the subject country.

The scope also includes MDI that is commingled or blended with MDI from sources not subject to this investigation. Only the subject component of such commingled products is covered by the scope of this investigation.

This merchandise is currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 2929.10.8010 and 3909.31.0000. Subject merchandise may also be entered under subheadings 3824.99.2600, 3909.50.1000, 3909.50.2000, 3909.50.5000, 3824.99.2900, 3506.91.5000, 3911.90.4500, 3921.13.5000, and 3920.99.5000. The HTSUS

subheadings are provided for convenience and customs purposes only; the written description of the scope is dispositive.

Appendix II

List of Topics Discussed in the Issues and Decision Memorandum

- I. Summary
- II. Background
- III. Scope of the *Order*
- IV. Changes since the *Preliminary Determination*
- V. Discussion of the Issues
 - Comment 1: Wanhua's Separate Rate Eligibility
 - Comment 2: Whether Commerce is Required to Verify Wanhua's Questionnaire Responses
 - Comment 3: Whether Commerce Should Select Shandong Mingko as a Mandatory or Voluntary Respondent
 - Comment 4: Selection of Surrogate Country
 - Comment 5: Whether Commerce Should Recalculate the Estimated Weighted-Average Dumping Margin for the China-Wide Entity
- VI. Recommendation