## C. Description of the Merchandise and Requested Scope of Investigations

### 1. *Requested Scope of the Investigations*

The petition covers HPDP products, defined as follows:

> The merchandise subject to this investigation is high purity dissolving pulp ("HPDP"), which is a dissolving pulp with an alpha cellulose percentage of 90 percent by weight or higher on an oven dry basis, as calculated by: alpha cellulose percentage = (100-S10) + 0.5*(S10-S18) where S10 and S18 values are determined by International Organization for Standardization ("ISO") 692:1982, and having a brightness level of 90 percent or higher, as measured by ISO 2470-1:2016. HPDP may be derived from any virgin or recycled cellulose fiber source (including, but not limited to, those sourced from hardwoods, softwoods, woody crops, agricultural crops/byproducts/residue, and agricultural/industrial/other waste). HPDP may be produced from a chemical pulping process including without limitation a kraft (sulfate) pulping and/or sulfite pulping process.
>
> HPDP can be shipped in any form, including, but not limited to, a liquid slurry or in any dried form such as flakes, powder, granules, pellets, shreds, rolls and sheets.
>
> The scope includes merchandise matching the above description that has been finished, packaged, or otherwise processed in a third country, including but not limited to processes such as commingling, blending, diluting, repackaging, or any other process that would not otherwise remove the merchandise from the scope of the investigation if performed in the subject country.
>
> Excluded from the scope are HPDP with an intrinsic viscosity under 455 milliliters per gram ("mL/g"), as measured by ISO 5351:2010.
>
> HPDP products are classified under subheadings 4702.00.0020 and 4702.00.0040, of the Harmonized Tariff Schedule of the United States ("HTSUS"). References to the HTSUS classification are provided for convenience and customs purposes, and the written description of the merchandise under investigation is dispositive.

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*Enforcement; Intellectual Property Protection; Ethanol Market Access; and Illegal Deforestation; Hearing; and Request for Public Comments*, 90 Fed. Reg. 34069 (July 18, 2025).



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