

August 12, 2024

The Honorable Amy A. Karpel
Chair
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

The Honorable Rhonda K. Schmidlein
Commissioner
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

The Honorable Jason E. Kearns
Commissioner
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

The Honorable David S. Johanson
Commissioner
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

Re: Proposed Duties on Aluminum Lithographic Printing Plates Will Increase Costs for Printing and Graphic Communications Industries, Businesses, and Consumers

Dear Chair Karpel and Commissioners Schmidlein, Kearns, and Johanson:

We are writing on behalf of the U.S. printing and graphic communications industries to urge the International Trade Commission (ITC) to reject antidumping (AD) and countervailing duties (CVD) on imports of aluminum lithographic printing plates from Japan and China. Additional duties on printing plates will lead to increased costs for printers and the businesses they serve, reduce competition in the printing plate market, and threaten the availability of quality printed materials for businesses and consumers alike.

Print and graphic communications companies use aluminum lithographic printing plates to print materials across a broad range of industries, including newspapers and magazines; marketing and promotional materials such as banners, flyers, leaflets, and brochures; mailing industry materials such as labels and product packaging; educational resources such as textbooks and test prep materials; consumer products such as medication inserts, consumer product packaging, instruction manuals; print media advertising and tradeshow exhibits; restaurant and food service industry resources such as menus, food labels, and meal prep kit instructions; and business documents such as financial reports, among many others. There is currently not a sufficient U.S.-based source for the aluminum sheet needed for printing plates, and so it must be imported from other countries.

We are concerned that additional duties will increase costs for American businesses. Although the entire printing and graphic communications industries and the customers they serve will feel the burden of increased costs – from the largest-scale commercial printers to the smallest mom-and-pop printers – we are particularly concerned that small printers and the thousands of small businesses served by printers in this country will disproportionately shoulder the burden.

In addition, we are concerned that new duties might reduce competition and cause aluminum printing plate suppliers to leave the U.S. market. There are already a limited number of suppliers of printing plates in the U.S., and the elimination of any suppliers not only threatens the consistent supply of print materials for all businesses but could also create a de facto monopoly in the market for aluminum printing plates.

We urge the ITC to reject the proposed duties on aluminum printing plates. These duties will threaten the printing and graphic communications industries, the jobs they support, and the printed products and services they provide to American businesses and consumers.

Sincerely,

Tim Freeman
Co-President
Print & Graphic Communications Association

Gabe Hernandez
President
Florida Graphics Alliance

Melissa Jones
Co-President
Print & Graphic Communications Association

Kristin Pilling-Davis
Executive Director
Printing Industry Midwest

Christine Hagopian
President
Printing Industries of New England

Ian Flynn
President
Visual Media Alliance

Jay Goldscher
President
Printing & Graphics Association MidAtlantic

Andrew Schall
President
Graphic Media Alliance

Jeff Stoudt
President
Printing Industry of the Carolinas

Tim Suraud
President
Print Media Association

Jon Krueger
President & CEO
Printing & Imaging Association of Georgia

Teresa Campbell
President
Printing & Imaging Association MidAmerica

Megan Anderson
President
Printing Industries Association of San Diego

