

April 1, 2026

Inv. Nos. 701-TA-650-651 (First
Review)**PUBLIC VERSION****Business Proprietary Information
for Which Proprietary Treatment
is Requested Removed from
Pages 1, 6-7, 12-14, and Exhibits
1, 2****VIA EDIS**The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436**Re: *Phosphate Fertilizers from Morocco and Russia: Petitioner's Response to
Notice of Institution of Five-Year ("Sunset") Review***

Dear Secretary Barton:

On behalf of The Mosaic Company (referred to herein as "Mosaic" or "Petitioner"), we hereby submit our response to the Commission's notice of institution of five-year reviews in *Phosphate Fertilizers from Morocco and Russia; Institution of Five-Year Reviews*, 91 Fed. Reg. 10,142 (Mar. 2, 2026). This submission is timely filed.¹

In accordance with 19 C.F.R. § 201.6, we request confidential treatment for certain factual information in this submission. This information appears within brackets on pages 1, 6-7,

¹ *Phosphate Fertilizers from Morocco and Russia; Institution of Five-Year Reviews*, 91 Fed. Reg. 10,142 (Mar. 2, 2026); 19 C.F.R. § 207.61.

The Honorable Lisa R. Barton
April 1, 2026
Page 2

and 12-14 and Exhibits 1 and 2 and consists of proprietary information concerning or relating to the production, sales, shipments, income, and other information of commercial value to Petitioner. This information is not available to the public and disclosure of this information to the public is likely to cause substantial harm to Petitioner's competitive position.

This submission is being served in accordance with the attached certificate of service. Please contact us if you have any questions.

Sincerely,

/s/ Stephanie E. Hartmann

David J. Ross

Stephanie E. Hartmann

Elizabeth A. Argenti

Heather Hedges

Jacob A. Laband

Min Seong Kim

Counsel for The Mosaic Company

ATTORNEY CERTIFICATION

I, Stephanie E. Hartmann, counsel to The Mosaic Company, certify that (1) I have read the enclosed submission dated April 1, 2026, and (2) to the best of my knowledge, the information contained in this submission is accurate and complete.

In accordance with section 201.6(b) of the Commission's rules, I also hereby certify that to the best of my knowledge, information substantially identical to that for which business proprietary treatment has been requested is not available to the general public. Public disclosure of this information would cause competitive harm to Petitioner and would be likely to impair the Commission's ability to obtain such information in the future as is necessary to perform its statutory functions.

I certify that the foregoing statements are true and accurate. I am aware that the information contained above may be subject to verification or corroboration (as appropriate) by the U.S. International Trade Commission. I am also aware that U.S. Law (including, but not limited to 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government.

/s/ Stephanie E. Hartmann
April 1, 2026

**U.S. International Trade Commission
PUBLIC CERTIFICATE OF SERVICE
Phosphate Fertilizers from Morocco and Russia
Inv. Nos. 701-TA-650-651 (Review)**

I, Stephanie E. Hartmann of Wilmer Cutler Pickering Hale and Dorr LLP, hereby certify that a copy of this submission was served in accordance with the Public Service List. Service was made electronically on this 1st day of April 2026 on the following:

On behalf of Koch Fertilizer, LLC:

Lian Yang
Alston & Bird LLP
950 F Steet, NW
Washington, DC 20004
Ken.weigel@alston.com

On behalf of the Government of Morocco:

Jonathan Zielinski
Cassidy Levy Kent (USA) LLP
900 19th Street NW
Suite 400
Washington, DC 20006
jzielinski@cassidylevy.com

**On behalf of OCP S.A., OCP Nutricrops
S.A., OCP North America, Inc.:**

Shara L. Aranoff
Covington and Burling LLP
670 Maine Ave SW
Suite 600
Washington, DC 20025
saranoff@cov.com

**On behalf of International Raw Materials
Ltd.:**

Melissa M. Brewer
Kelley Drye & Warren LLP
3050 K Street, NW
Washington, DC 20007
mbrewer@kelleydrye.com

On behalf of J.R. Simplot Company:

Patrick McLain
King & Spalding LLP
1700 Pennsylvania Ave., N.W.
Washington, DC 20006
pmclain@kslaw.com

/s/ Stephanie E. Hartmann
Stephanie E. Hartmann

**BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

PUBLIC VERSION

Proprietary Treatment Requested for
Business Proprietary Information
Removed from Pages 1, 6-7, 12-14,
Exhibits 1, 2

**Phosphate Fertilizers from Morocco and Russia
Inv. Nos. 701-TA-650-651 (First Review)**

**RESPONSE TO THE COMMISSION'S NOTICE OF INSTITUTION
ON BEHALF OF
THE MOSAIC COMPANY**

David J. Ross
Stephanie E. Hartmann
Elizabeth A. Argenti
Heather Hedges
Jacob A. Laband
Min Seong Kim
WILMER CUTLER PICKERING
HALE and DORR LLP
2100 Pennsylvania Avenue, NW
Washington, DC 20037

Counsel to The Mosaic Company

April 1, 2026

Table of Contents

I.	CONTACT INFORMATION.....	1
II.	INTERESTED PARTY STATUS	1
III.	WILLINGNESS TO PARTICIPATE.....	1
IV.	LIKELY EFFECTS OF REVOCATION	2
	A. Domestic Like Product	3
	B. Cumulation.....	4
	C. Likely Volume of Imports	6
	D. Likely Price Effects of Imports.....	9
	E. Likely Impact of Imports on the Domestic Industry.....	10
V.	U.S. PRODUCERS.....	11
VI.	U.S. IMPORTERS AND FOREIGN PRODUCERS OF SUBJECT MERCHANDISE .	12
VII.	LEADING PURCHASERS	12
VIII.	SOURCES OF INFORMATION	13
IX.	INFORMATION ON U.S. PRODUCERS’ OPERATIONS.....	14
X.	INFORMATION ON U.S. IMPORTERS’ OPERATIONS.....	14
XI.	SIGNIFICANT CHANGES.....	15
XII.	CONCLUSION.....	15

In accordance with 19 C.F.R. § 207.61, The Mosaic Company (“Mosaic” or “Petitioner”) hereby submits its response to the Notice of Institution of the above-captioned five-year (“sunset”) reviews issued by the U.S. International Trade Commission (the “Commission”) with respect to the countervailing duty orders on phosphate fertilizers from Morocco and Russia (collectively, the “Orders”).² This response provides the information requested in the Notice of Institution and is timely filed pursuant to that notice and in accordance with the Commission’s regulations.³

I. CONTACT INFORMATION

Petitioner’s name and address (including World Wide Web addresses) and the name, telephone number, fax number, and email address of the certifying official are as follows:

The Mosaic Company
101 E Kennedy Boulevard, Suite 2500
Tampa, Florida 33602
Tel: (813) 775-4200
www.mosaicco.com
Contact person: Phil Bauer
Email: []

II. INTERESTED PARTY STATUS

Mosaic is a U.S. producer of the domestic like product and thus an interested party within the meaning of 19 U.S.C. § 1677(9)(C).

III. WILLINGNESS TO PARTICIPATE

Mosaic is willing to participate fully in these sunset reviews by providing information requested by the Commission.

² *Phosphate Fertilizers From Morocco and Russia; Institution of Five-Year Reviews*, 91 Fed. Reg. 10,142 (Mar. 2, 2026) (“Notice of Institution”).

³ 19 C.F.R. § 207.61.

IV. LIKELY EFFECTS OF REVOCATION

Revocation of the Orders is likely to lead to the continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. Section 752(a) of the Tariff Act of 1930, as amended, provides that, in determining whether revocation of an antidumping or countervailing duty order is likely to lead to continuation or recurrence of material injury, the Commission is to consider the likely volume, price effect, and impact of imports of subject merchandise if the order(s) were revoked and, in particular:⁴

- (A) {the Commission's} prior injury determinations, including the volume, price, effect, and impact of imports of the subject merchandise on the industry before the order was issued . . . ,
- (B) whether any improvement in the state of the industry is related to the order . . . ,
- (C) whether the industry is vulnerable to material injury if the order is revoked

As detailed below, examination of these factors confirm that revocation of the Orders would likely lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time.

While the Orders have had a disciplining effect on the volumes and prices of subject imports, revocation would remove those disciplines, making the United States an attractive target for subject producers' available production capacity, which has only grown since the Orders were introduced. Subject producers are export-oriented, have an established presence in the United States, and have a clear record of targeting the United States with significant volumes of unfairly traded imports. With large and growing production capacity, subject producers would have every incentive to significantly increase exports of unfairly traded subject merchandise in

⁴ 19 U.S.C. § 1675a(a)(1).

the event of revocation of the Orders. The predictable result would be continuation or recurrence of material injury to a vulnerable domestic industry.

A. Domestic Like Product

In the original investigations, the Commission defined a single domestic like product co-extensive with the scope of the investigations.⁵ The Commission should do so again in these reviews.

The covered merchandise includes all types of phosphate fertilizers.⁶ Phosphate fertilizers contain phosphorous (P), one of three essential nutrients for plant growth, along with nitrogen (N) and potassium (K).⁷ Phosphate fertilizers may contain only P content or be chemically combined or physically blended with N and/or K content.⁸ The main types of phosphate fertilizers are: monoammonium phosphate (“MAP”); diammonium phosphate (“DAP”); triple super phosphate (“TSP”); single superphosphate or normal superphosphate (“SSP/NSP”); nitrogen, phosphorous, potassium fertilizers (“NPK”); and nitrogen, sulfur, phosphorous blends (“NPS”), such as Mosaic’s proprietary Microessentials® product.⁹

In the original investigations, the Commission found that “there is overlap between all phosphate fertilizers with respect to physical characteristics and uses.”¹⁰ The Commission also found that “all phosphate fertilizers share the same fundamental production processes using the same equipment and employees,” and that all phosphate fertilizers are sold through the same channels of distribution, namely primarily to retailers and distributors/wholesalers.¹¹ Although

⁵ See *Phosphate Fertilizers from Morocco and Russia*, Inv. Nos. 701-TA-650-651 (Final), USITC Pub. 5172, at 8 (March 2021) (“*Inv. Final Determination*”).

⁶ *Id.* at 5-6.

⁷ *Id.* at 7.

⁸ *Id.* at 7.

⁹ *Id.* at 7; *Phosphate Fertilizers from Morocco and Russia*, Inv. Nos. 701-TA-650-651 (Prelim.), USITC Pub. 5105, at 10 (Aug. 2020) (“*Inv. Prelim. Determination*”).

¹⁰ *Inv. Prelim. Determination* at 10.

¹¹ *Id.* at 10-11.

the Commission noted “there is some limited interchangeability between each specific type of phosphate fertilizer due to their different chemical formulations,” all phosphate fertilizers overlap in having P content.¹² Further, as Mosaic explained in the original investigations, the various types of phosphate fertilizers are broadly interchangeable under most conditions, particularly when used in blends, and there are no significant differences in producer or customer perceptions.¹³ The Commission properly concluded that “all phosphate fertilizers share a common use of providing phosphate for agriculture, and different formulations may be blended together for use in specific applications.”¹⁴ Price is also not a distinguishing factor as pricing depends on chemical composition and nutrient content, with fertilizers containing higher nutrient content commanding a price premium over products with relatively lower nutrient content.¹⁵

Nothing has changed since the original investigations that would alter the Commission’s analysis regarding the various types of phosphate fertilizers. Therefore, there are no clear dividing lines between types of phosphate fertilizers, and the Commission should again define a single domestic like product that is co-extensive with the scope for purposes of these reviews.

B. Cumulation

The Commission “may cumulatively assess the volume and effect of imports of the subject merchandise from all countries . . . if such imports would be likely to compete with each other and with domestic like products in the United States market.”¹⁶ In these reviews, the Commission should exercise its discretion to cumulate subject imports from Morocco and Russia because (i) there is a reasonable overlap of competition between imports from subject countries

¹² *Id.* at 11.

¹³ *Id.* at 12.

¹⁴ *Id.* at 12-13.

¹⁵ *Id.*

¹⁶ 19 U.S.C. § 1675a(a)(7).

and between subject imports and the domestic like product, and (ii) subject imports are not likely to have no discernible adverse impact on the domestic industry.

First, domestically produced phosphate fertilizers compete directly against, and are highly substitutable with, phosphate fertilizers from both Morocco and Russia. In the original investigations, the Commission found that “phosphate fertilizers from all sources generally are viewed as being interchangeable.”¹⁷ Subject imports are fungible with the domestic like product and with each other; are sold through the same channels of distribution; are present in similar geographical markets; and were simultaneously present in the United States throughout the period of investigation (“POI”).¹⁸ The Commission therefore concluded that there is a reasonable overlap of competition between subject imports and the domestic like product, as well as between subject imports from each country.¹⁹ The relevant conditions of competition have not changed since the original investigations, and there continues to be a reasonable overlap of competition among subject imports from both countries and between subject imports and the domestic like product.

Second, it is not likely that subject imports would have no discernible adverse impact on the domestic industry if the Orders were revoked. As discussed in further detail below, subject producers are export-oriented, already have an established presence in the U.S. market, and have substantial and increasing capacity. Thus, subject imports are likely to have a material – and easily discernible – adverse impact on the domestic industry if the Orders are revoked.

¹⁷ *Inv. Prelim. Determination* at 16; *Inv. Final Determination* at 11.

¹⁸ *Inv. Prelim. Determination* at 16-17; *Inv. Final Determination* at 11-12.

¹⁹ *Inv. Prelim. Determination* at 17; *Inv. Final Determination* at 12.

C. Likely Volume of Imports

Section 752(a)(2) of the Tariff Act of 1930 directs the Commission to evaluate whether the likely volume of subject imports would be significant if the Orders were revoked, either in absolute terms or relative to production or consumption in the United States.²⁰ In doing so, the Commission is also to consider, *inter alia*, whether there is any likely increase in production capacity or existing unused production capacity in the exporting countries; existing inventories of subject merchandise, or likely increases in inventories; and whether there are any barriers to the importation of such merchandise into countries other than the United States.²¹

Revocation of the Orders will likely lead to significantly increased volumes of subject imports, in part because there have been substantial increases in subject production capacity since the original investigations and, based on Mosaic's knowledge and belief, subject producers have substantial excess capacity.

In the original investigations, the Commission based its determinations on responses from one Moroccan producer, OCP S.A., and two Russian producers, PhosAgro PJSC ("PhosAgro") and EuroChem Group AG ("EuroChem").²² According to Petitioner's proprietary market data, OCP's total production capacity during the original period of investigation [

].²³ The Russian

producers had total capacity in 2017 of [],

²⁰ 19 U.S.C. § 1675a(a)(2).

²¹ *Id.*

²² *Inv. Final Determination*, at VII-3, VII-10.

²³ See Mosaic Proprietary Data, attached as Exhibit 2.

which [] to [] by 2020.²⁴

As of 2025, based on Petitioner’s proprietary data, OCP had total capacity of [

], and the Russian producers had capacity of [

].²⁵ On a cumulative

basis, subject producers’ capacity has [

] over the POR.²⁶ Subject producers now have [] of capacity,

roughly [] the size of the domestic industry:²⁷

Production Capacity (Million Short Tons)	2017	2020	2025	% Change since 2017	% Change over POR
Morocco	[]	[]	[]	[]	[]
Russia	[]	[]	[]	[]	[]
Subject Countries	[]	[]	[]	[]	[]
United States	[]	[]	[]	[]	[]

Subject producers are also highly export-oriented.²⁸ The United States is one of the largest markets for phosphate fertilizers in the world,²⁹ and it was the second-largest export market for Morocco during the original investigations.³⁰ Even with the disciplining effect of the

²⁴ See *id.*

²⁵ See *id.*

²⁶ See *id.*

²⁷ See *id.*

²⁸ See *Inv. Final Determination* at 65-66.

²⁹ See *Inv. Final Determination* at VII-8, VII-15.

³⁰ See *Inv. Final Determination* at VII-7 – VII-8.

Orders, subject imports have maintained a presence in the U.S. market, albeit well below pre-order levels:

Quantities in MT	2019	2020	2021	2022	2023	2024	2025
Morocco - LDPV	750,970,949	286,568,295	54,549,088	39,074,806	62,963,838	51,126,840	5,781,126
Morocco - Quantity	2,049,024	969,098	91,258	50,517	126,122	126,775	4,502
Russia - LDPV	314,391,835	130,230,578	81,807,866	250,395,831	185,922,106	64,766,320	14,513,045
Russia - Quantity	767,306	407,527	119,729	237,018	219,411	8,736	14,219
Subject - LDPV	1,065,362,784	416,798,873	136,356,954	289,470,637	248,885,944	115,893,160	20,294,171
Subject - Quantity	2,816,330	1,376,625	210,987	287,535	345,533	135,511	18,721
World - LDPV	1,433,156,888	924,282,749	1,973,703,461	1,571,766,122	1,610,347,306	1,883,587,449	1,357,906,775
World - Quantity	3,622,362	2,694,829	3,433,957	1,846,510	2,764,928	3,106,161	1,949,074

Source: USITC Dataweb, HTSUS Subheadings 3103.10, 3103.11, 3103.19, 3105.30, 3105.40, 3105.51, 3105.59, 3105.60

Thus, subject producers have an established presence in, and continue to target, the United States. Their efforts to sell into the United States would likely only intensify if the restraint of the Orders were removed.

Moreover, because phosphate fertilizer production is capital-intensive, producers have an incentive to maintain high capacity utilization rates.³¹ In light of the economic imperative to maintain high capacity utilization rates, the increases in capacity that occurred during the period of review (“POR”) create a strong incentive to regain market share in the United States. Subject producers thus have the capability and incentive to significantly increase shipments to the United States within a reasonably foreseeable time if the Orders were revoked.

³¹ See *Inv. Final Determination* at 41 (explaining that Mosaic ships to export markets such as India and Brazil to help support year-round capacity utilization rates during the “off-season” periods in the United States).

In sum, subject producers have substantial capacity to manufacture high volumes of subject merchandise and are willing and able to export large volumes to the United States. The Commission should therefore find that the likely volume of subject imports would be significant if the Orders were revoked.

D. Likely Price Effects of Imports

Section 752(a)(3) of the Tariff Act of 1930 directs the Commission to evaluate the likely price effects of subject imports if the Orders were revoked, considering in particular whether: (a) there is likely to be significant price underselling by subject imports; and (b) whether subject imports are likely to have a significant depressing or suppressing effect on the price of the domestic like product.³²

In the original investigations, the Commission found that “subject imports – through their significant volumes that created oversupply conditions in a declining market and low prices – exerted downward pricing pressure on the domestic like product and significantly depressed U.S. prices.”³³ Because of the importance of price in customers’ purchasing decisions,³⁴ the high degree of substitutability between the domestic like product and subject imports,³⁵ and the price transparency that exists in the phosphate fertilizer market,³⁶ prices of subject imports and the domestic like product closely track each other and any amount of underselling by subject imports is likely to cause U.S. producers to lower their prices or forego price increases, and therefore have significant price depressing or suppressing effects.

³² 19 U.S.C. § 1675a(a)(3).

³³ See *Inv. Final Determination* at 33.

³⁴ See *Inv. Final Determination* at 22 (“We further find that price along with availability and quality are important considerations in purchasing decisions.”).

³⁵ See *Inv. Final Determination* at 21 (“We find that there is a high degree of substitutability between the domestic like product and phosphate fertilizers from subject sources that are of the same chemical formulations, and that phosphate fertilizers with different chemical formulations are broadly interchangeable, particularly when used in blends.”).

³⁶ See *Inv. Final Determination* at 29.

As explained above, if the Orders were revoked, subject producers would be incentivized to export significant volumes of subsidized subject merchandise to the United States. Given the price-sensitive nature of the phosphate fertilizer market and high degree of price transparency and substitutability between subject imports and the domestic like product, U.S. producers would be forced to lower their own prices or forego price increases in order to preserve market share. Thus, if the Orders were revoked, subject imports would be likely to undersell the domestic like product and have a significant depressing and/or suppressing effect on the prices of the domestic like product within the reasonably foreseeable future.

E. Likely Impact of Imports on the Domestic Industry

In the original investigations, the Commission found that the financial position of the domestic industry deteriorated due to a cost-price squeeze as “{s}ubject imports poured into the U.S. market over the POI and gained . . . market share from the domestic industry.”³⁷ The Commission also found that “{d}ue to the downward pricing pressure exerted by the oversupply of subject imports on U.S. prices, the domestic industry was forced to reduce prices, which in turn, caused its revenues” to decline.³⁸ The Commission noted the domestic industry’s declining sales revenues, profitability, and rising COGS to net sales ratio over the POI.³⁹ The severe financial declines and deterioration in the overall condition of the domestic industry were directly caused by significant increases in the volume and market share of subject imports. The Commission therefore concluded that subject imports had materially injured the domestic industry.⁴⁰

³⁷ *Inv. Final Determination* at 39.

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

The same conditions are likely to recur if the Orders are revoked. As explained in Section IV.C, subject producers continue to be export-oriented and have significantly expanded their production capacity since the original investigation. In the event of revocation, subject producers would be incentivized to export large volumes of subsidized subject merchandise to the United States. A surge in subject imports would force U.S. producers to lower their prices or forego price increases in order to compete to win sales and preserve market share. The predictable result would be a material adverse impact on the domestic industry's operations and financial performance. Moreover, based on Mosaic's proprietary data, the domestic industry remains weakened and highly vulnerable to the significant volumes of underpriced subject imports that would likely occur if the Orders were revoked.⁴¹

Consequently, revocation of the Orders would likely result in significantly increased volumes of low-priced imports of subject merchandise and cause the domestic industry to experience the continuation or recurrence of material injury within a reasonably foreseeable time.

V. U.S. PRODUCERS

Based on information and belief, the following companies currently produce the domestic like product: (1) The Mosaic Company; (2) J.R. Simplot Company, LLC; (3) Nutrien, Ltd.; (4) Itafos; and (5) Rouge Steel Co.

Based on information and belief, none of these firms is an exporter or importer of subject merchandise or is related to any known exporter or importer of subject merchandise.

⁴¹ See Mosaic Response to Notice of Institution Worksheet, attached as Exhibit 1.

VI. U.S. IMPORTERS AND FOREIGN PRODUCERS OF SUBJECT MERCHANDISE

Based on information and belief, the currently operating U.S. importers of subject merchandise include: (1) ADM Fertilizer; (2) Ameropa North America; (3) Ben-Trei Fertilizer Co. LLC; (4) CHS (Cenex Harvest States); (5) Disan Peru; (6) EuroChem Trading USA Corp./Lifosa; (7) Food Security Solutions/Ukralkali; (8) Fertistream DMCC; (9) Gavilon Fertilizer LLC (MacroSource); (10) Helm Fertilizer Corp.; (11) International Raw Materials; (12) Koch Fertilizer/Koch Nitrogen; (13) Meherrin; (14) Molinos & CIA S.A.; (15) National Federation of Agriculture; (16) Nitrofert S.A.S.; (17) Nitron Group LLC; (18) Nutricion de Plantas S.A.; (19) OCP North America; and (20) Pursell Agri-Tech LLC.

Based on information and belief, the only Moroccan producer of the subject merchandise that currently exports or has exported subject merchandise to the United States or other countries since 2021 is OCP S.A., including its cross-owned affiliates.

Based on information and belief, the Russian producers of subject merchandise that currently export or have exported subject merchandise to the United States or other countries since 2021 are (1) PhosAgro; (2) EuroChem; (3) Meleuz Minudobreniya; (4) Lermontov Hydro Metallurgical Plant; and (5) URALCHEM JSC.

VII. LEADING PURCHASERS

The following is a list of five leading purchasers in the U.S. market for the domestic like product and subject merchandise:

1. [

]

2. [

]

3. [

]

4. [

]

5. [

]

VIII. SOURCES OF INFORMATION

Industry publications are the primary source of U.S. pricing information, for example: Argus Media, Bloomberg/Green Markets, CRU Fertilizer Week, Profercy, Fertecon/S&P Global, Acuity, etc. Other subscription-based services such as StoneX and DTN also provide wholesale and retail fertilizer pricing. Information on fertilizer prices is also available from public sources such as the U.S. Department of Agriculture, which publishes retail pricing on a state-by-state basis.

IX. INFORMATION ON U.S. PRODUCERS' OPERATIONS

The following table provides the information requested in Question 9 of the Commission's Notice of Institution regarding Mosaic's operations as a U.S. producer of the domestic like product during calendar year 2025:⁴²

(a)	Production Quantity in ST Estimated % of Total US Production	[] []
(b)	Capacity Quantity in ST	[]
(c)	U.S. Commercial Shipments: Quantity in ST Value in Actual USD	[] []
(d)	U.S. Internal Consumption/Related Company Transfers: Quantity in ST Value in Actual USD	[] []
(e)(i)	Net Sales (Value) Value in Actual USD	[]
(e)(ii)	Cost of Goods Sold (COGS) Value in Actual USD	[]
(e)(iii)	Gross Profit or (Loss) Value in Actual USD	[]
(e)(iv)	Selling, General, and Administrative (SG&A) Expenses Value in Actual USD	[]
(e)(v)	Operating Income or (Loss) Value in Actual USD	[]

X. INFORMATION ON U.S. IMPORTERS' OPERATIONS

Mosaic is not currently an importer of subject merchandise and did not import subject merchandise during the period covered by these reviews.⁴³

⁴² Quantity data are reported in pounds and U.S. dollars, f.o.b. plant. Fiscal year ends on December 31.

⁴³ Mosaic is also not a foreign producer or exporter of subject merchandise. Accordingly, we are not providing the information requested in Question 11.

XI. SIGNIFICANT CHANGES

The fundamental demand and supply conditions for phosphate fertilizers in the United States have not changed since the original investigations. There have also been no significant changes in technology or production methods for phosphate fertilizers. There have also been no significant changes in end uses and applications for phosphate fertilizers, and there continue to be no substitutes for phosphate fertilizers. There continues to be a high degree of substitutability and competition among the domestic like product, subject merchandise from Morocco and Russia, and non-subject imports. Mosaic does not have information on subject producers' ability to shift production facilities or changes in the use, cost, or availability of major inputs to production in subject countries. Mosaic is not aware of any barriers to importation in major foreign markets or changes in market demand abroad for phosphate fertilizers.

XII. CONCLUSION

In this submission, Mosaic has provided the Commission with all information requested by the Notice of Institution to the best of its ability. On the basis of the above information, the Commission should conclude that revocation of the Orders would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time.

Respectfully submitted,

/s/ Stephanie E. Hartmann

David J. Ross
Stephanie E. Hartmann
Elizabeth A. Argenti
Heather Hedges
Jacob A. Laband
Min Seong Kim

Counsel for The Mosaic Company

Exhibit List	
1	Mosaic Response to Notice of Institution Worksheet
2	Mosaic Proprietary Data

EXHIBIT 1

Instructions on using this worksheet in developing a response to a Commission Notice of Institution relating to:
Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

Instructions

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

Pursuant to the Tariff Act of 1930, interested parties are requested to respond to the notice of institution by submitting the information specified in that notice.

The submission of responses to the notice of institution in Excel format allows the Commission to electronically extract data and thus, compile, assess, and analyze submitted data more efficiently and promptly.

This Excel worksheet covers all items mentioned in the Commission's notice of institution EXCEPT for items 4 and 12. Your responses to required items 4 and 12 and any additional information/documentation you deem necessary for your response will need to be drafted outside of this worksheet. A PDF of this Excel worksheet together with your responses to required items 4 and 12 and any additional information should be compiled and submitted as one EDIS filing.

Each tab corresponds to items as labeled/numbered in the section of the notice entitled "Information To Be Provided In Response To This Notice Of Institution".

*****For your response to be considered, it must be filed on EDIS.*****

Complete additional worksheet(s) if more than ten firms are part of your response.

Multiple firms also have the option to file one consolidated response to the Notice of Institution on behalf of an ad hoc coalition (as firm 1 in tab #1,2,3).

STEP 1: COMPLETE THE WORKSHEET

Please work through and ensure the data inputs do not contain any data entry errors, and that derivative calculations provided in the worksheet appear reasonable. If a "Data Flag" is tripped (and an error message displayed), please revise and correct that data prior to submission to the Commission as appropriate.

Leave blank any fields that are not applicable to your firm.

Do NOT attempt to modify the format or permissions of this worksheet.

Do NOT attempt to delete any rows or tabs from this worksheet.

Do NOT modify existing file name except to append a party name

e.g. 701-559_OSBM-NOI_worksheet_ *PARTY_NAME* (where text in black is not modified by your firm prior to submission to USITC).

STEP 2: CONVERT TO PDF FORMAT AND FILE ON EDIS

Convert all tabs into a compiled PDF.

To convert Excel into PDF, either "save as" PDF or "print" to PDF. The print settings have been preselected for PDF conversion. DO NOT make any adjustments to the print settings to ensure a suitable presentation.

The compiled PDF should be exhibit 1 or attachment 1 of your firm's overall response to the Notice of Institution that is submitted into EDIS. Do not include blank PDF pages in exhibit/attachment 1 (for example firm identification pages that are not being used in your submission).

For instructions on how to file your official submission into EDIS, refer to the Commission's notice of institution.

STEP 3: UPLOAD EXCEL WORKSHEET VIA SECURE PORTAL

Please also submit this Excel worksheet via the secure portal shortly after formally filing on EDIS your response to the notice of institution.

*****By submitting the Excel worksheet to Commission staff, you are certifying that the worksheet matches your official submission on EDIS.*****

Web address:

<https://usitc.gov/noiportal>

Alternatively, the Excel worksheet may also be emailed to the assigned investigator. See Commission's notice of institution for investigator's contact email.

Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure portal and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm's nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.

STEP 4: CREATING PUBLIC VERSION

Business proprietary information should be removed from the public version of your official response.

For the public version of tabs #1,2,3; #5,6; and #7,8,13 : Remove all information deemed as business proprietary (i.e., information identified by brackets) and select "Public (non-confidential) version" from the header row's drop-down menu. Follow step 2 above for instructions on converting the public page to PDF for filing on EDIS. Additional text not visible in any blue entry field (i.e., outside allowed cell margins) must be separately included in your overall submission (i.e., outside of the information compiled in this worksheet).

For the public version of tabs #9 and #10,11 : Scroll down the page on each tab to the section following the green spanner row titled "Public (non-confidential) version" and select from the drop-down menus in each data element row to answer the question "Are data public?" According to your answer, the summary data will auto-populate (if public) or a "Redacted" message will auto-populate (if BPI). Follow step 2 above for instructions on converting the page to PDF and file only the Public portion for filing as a public document on EDIS.

Public (non-confidential) version

Parties should redact business proprietary information

Interested party identification in response to a Commission Notice of Institution relating to:

Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

Interested party(ies)

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

Law firm(s) representing the interested party(ies)

Name of law firm(s)

Wilmer Cutler Pickering Hale and Dorr LLP

Name of counsel (lead attorney(s))

Stephanie Hartmann

Counsel email(s) (lead attorney(s))

stephanie.hartmann@wilmerhale.com

Filed on behalf of (interested party short name):

Mosaic

Public (non-confidential) version

Parties should redact business proprietary information

Interested party identification in response to a Commission Notice of Institution relating to:
Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

Interested party(ies)

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

Interested Party / Firm 1

Identifying information for interested party / firm:

Firm 1: Name of interested party	The Mosaic Company
Firm 1: Street Address	101 E Kennedy Boulevard, Suite 2500
Firm 1: City	Tampa
Firm 1: State	FL
Firm 1: Zip	33,602
Firm 1: Country	United States
Firm 1: Website	www.mosaicco.com
Firm 1: Certifying official name	Phil Bauer
Firm 1: Certifying official phone number	813-775-4200
Firm 1: Certifying official email	[***]

Interested party status (at least one must be marked "yes") SM = subject merchandise; DLP = domestic like product:

Firm 1: U.S. producer of DLP	Yes
Firm 1: U.S. importer of SM	No
Firm 1: Foreign producer/exporter of SM	No
Firm 1: U.S. union or worker group of DLP	No
Firm 1: U.S. association/coalition of DLP	No
Firm 1: Foreign association/coalition of SM	No
Firm 1: Foreign government of SM	No

If your firm is both a U.S. Producer of the domestic like product and an importer of the subject merchandise:

Firm 1: Does your firm support orders:	Yes
Firm 1: If "mixed" support, please explain:	

If U.S. union or worker group, identify the firms in which your workers are employed:

Firm 1: Identify firm(s):	
---------------------------	--

If U.S. or foreign trade or business association or a coalition of firms/trade associations, identify the firms which are members of your association/coalition and provide a statement addressing the "majority" requirement to be considered an interested party:

Firm 1: Indicate how "interested party"? Example: Widget Association consists of 10 individual members, 8 of which are U.S. producers of domestic like product (widgets), hence interested parties. {If your list of association members, is provided in your overall submission but not in this worksheet, please indicate the location.}	
--	--

Is your firm/entity willing to participate in this proceeding by providing information requested by the Commission?

Firm 1: Willing to participate?	Yes
---------------------------------	-----

Public (non-confidential) version

Parties should redact business proprietary information

Interested party identification in response to a Commission Notice of Institution relating to:

Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

List of known U.S. producers, U.S. Importers, and Foreign Producers/Exporters

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

Indicate the number of known U.S. producers of the Domestic Like Product, U.S. importers of the Subject Merchandise, and Foreign Producers/Exporters of the Subject Merchandise in the Subject Country/Countries.

Number of U.S. producers	6
Number of U.S. importers	20
Number of foreign producers/exporters	4

List all known firms reported above (including your firm)

Company type (see drop down)	Company name	Country	Contact email address, if available	OPTIONAL: Other known contact information (e.g., phone, website, address)
US producer	The Mosaic Company	United States		
US producer	J.R. Simplot Company	United States		
US producer	Nutrien, Ltd.	United States		
US producer	Itafos	United States		
US importer	ADM Fertilizer	United States		
US importer	Ameropa North America	United States		
US importer	Ben-Trei Fertilizer Co., LLC	United States		
US importer	CHS (Cenex Harvest States)	United States		
US importer	Disan Peru	United States		
US importer	EuroChem Trading USA Corp./Lifosa	United States		
US importer	Food Security Solutions/Ukralkali	United States		
US importer	Fertistream DMCC	United States		
US importer	Gavilon Fertilizer LLC/MacroSource	United States		
US importer	Helm Fertilizer Corp.	United States		
US importer	International Raw Materials	United States		
US importer	Koch Fertilizer/Koch Nitrogen	United States		
US importer	Meherrin	United States		
US importer	Molinos & CIA S.A.	United States		
US importer	National Federation of Agriculture	United States		
US importer	Nitrofert S.A.S.	United States		
US importer	Nitron Group LLC	United States		
US importer	Nutricion des Plantas S.A.	United States		
US importer	OCP North America	United States		
US importer	Pursell Agri-Tech LLC	United States		
Foreign producer or exporter	OCP S.A.	Morocco		
Foreign producer or exporter	PhosAgro PJSC	Russia		
Foreign producer or exporter	EuroChem Group AG	Russia		
Foreign producer or exporter	Meleuz Minudobreniya	Russia		
Foreign producer or exporter	Lermontov Hydro Metallurgical Plant	Russia		
Foreign producer or exporter	URALCHEM JSC	Russia		
US producer	Rouge Steel Co	United States		

Public (non-confidential) version

Parties should redact business proprietary information

Additional information in response to a Commission Notice of Institution relating to:
Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

Purchasers, Sources of Pricing, and Certifications (including related parties)

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

List 3-5 leading purchasers in the U.S. market for the Domestic Like Product and the Subject Merchandise:

Purchaser 1: Firm name	[***]
Purchaser 1: Contact name	[***]
Purchaser 1: Contact email	[***]
Purchaser 1: Contact phone number	[***]
Purchaser 1: Street address	[***]
Purchaser 1: Firm website	[***]

Purchaser 2: Firm name	[***]
Purchaser 2: Contact name	[***]
Purchaser 2: Contact email	[***]
Purchaser 2: Contact phone number	[***]
Purchaser 2: Street address	[***]
Purchaser 2: Firm website	[***]

Purchaser 3: Firm name	[***]
Purchaser 3: Contact name	[***]
Purchaser 3: Contact email	[***]
Purchaser 3: Contact phone number	[***]
Purchaser 3: Street address	[***]
Purchaser 3: Firm website	[***]

Purchaser 4: Firm name	[***]
Purchaser 4: Contact name	[***]
Purchaser 4: Contact email	[***]
Purchaser 4: Contact phone number	[***]
Purchaser 4: Street address	[***]
Purchaser 4: Firm website	[***]

Purchaser 5: Firm name	[***]
Purchaser 5: Contact name	[***]
Purchaser 5: Contact email	[***]
Purchaser 5: Contact phone number	[***]
Purchaser 5: Street address	[***]
Purchaser 5: Firm website	[***]

Public (non-confidential) version

Parties should redact business proprietary information

Additional information in response to a Commission Notice of Institution relating to:

Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

Purchasers, Sources of Pricing, and Certifications (including related parties)

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

Are there any known sources of information on national or regional prices for the Domestic Like Product or the Subject Merchandise in the U.S. or other markets?

Are you aware of sources?

If yes, please list sources separated by commas: **(If response is too lengthy and not fully visible in the blue entry field, it must be separately included in your overall submission (i.e., outside of the information compiled in this worksheet)).**

Yes

Industry publications are the primary source of U.S. pricing information, for example: Argus Media, Bloomberg/Green Markets, CRU Fertilizer Week, Profercy, Fertecon/S&P Global, Acuity, etc. Other subscription-based services such as StoneX and DTN also provide wholesale and retail fertilizer pricing. Information on fertilizer prices is also available from public sources such as the U.S. Department of Agriculture, which publishes retail pricing on a state-by-state basis.

Please confirm the following:

My overall submission (i.e., outside of the information compiled in this worksheet) includes a statement of the likely effects of revocation/termination of the findings/orders of the suspended investigations on the Domestic Industry in general and/or your firm/entity specifically. In your response, please discuss the various factors specified in section 752(a) of the Act (19 U.S.C. 1675(a)) including the likely volume of subject imports, likely price effects of subject imports, and likely impact of imports of Subject Merchandise on the Domestic Industry.

Effects of revocation statement (Yes/No):

Yes

My overall submission includes a list of known U.S. producers, U.S. importers, and foreign producers (either in this worksheet or separately).

Company lists (Yes/No):

Yes--In this worksheet

My overall submission (i.e., outside of the information compiled in this worksheet) includes a statement identifying significant changes, if any, in the supply and demand conditions or business cycle for the Domestic Like Product that have occurred in the United States or in the market for the Subject Merchandise in each Subject Country since the most recent Order Date, and significant changes, if any, that are likely to occur within a reasonably foreseeable time. Supply conditions to consider include technology; production methods; development efforts; ability to increase production (including the shift of production facilities used for other products and the use, cost, or availability of major inputs into production); and factors related to the ability to shift supply among different national markets (including barriers to importation in foreign markets or changes in market demand abroad). Demand conditions to consider include end uses and applications; the existence and availability of substitute products; and the level of competition among the Domestic Like Product produced in the United States, Subject Merchandise produced in each Subject Country, and such merchandise from other countries.

Conditions of competition statement (Yes/No):

Yes

OPTIONAL: My overall submission (i.e., outside of the information compiled in this worksheet) includes a statement of whether I agree with the Domestic Like Product and Domestic Industry as defined in the Notice of Institution. If you disagree with either or both of these definitions, please explain why and provide alternative definitions separately in your overall submission.

Domestic industry/product statement:

Yes

Are there any known related parties (as defined in the statute)?

Known related parties (Yes/No):

No

My overall submission (i.e., inclusive but not limited to the information compiled in this worksheet) includes the identification of any known related parties (as defined in the statute) and the nature of their relationship.

Related party statement (Yes/No):

Yes

U.S. producers' data for a response to a Commission Notice of Institution relating to:
Phosphate Fertilizers from Morocco and Russia; Inv No(s): 701-TA-650-651 (Review)

U.S. producers

Data submitted by Wilmer Cutler Pickering Hale and Dorr LLP; on behalf of interested party: Mosaic

Public (non-confidential) version

SUMMARY TRADE AND FINANCIAL DATA

Data element	Unit of measure	Year:	Are data public?
		2,025	Status
		All firms Summation	
Capacity quantity	short tons	Redacted	No
Production quantity	short tons	Redacted	No
Commercial U.S. shipments quantity	short tons	Redacted	No
Commercial U.S. shipments value	dollars	Redacted	No
IC/TR in the US quantity	short tons	Redacted	No
IC/TR in the US value	dollars	Redacted	No
Capacity utilization ratio	Percent	Redacted	
Flag: Capacity utilization ratio	Count	Redacted	
Commercial sales unit value	dollars per short ton	Redacted	
Flag: Commercial sales unit value	Count	Redacted	
IC/TR in the US unit value	dollars per short ton	Redacted	
Flag: IC/TR in the US unit value	Count	Redacted	
US shipments quantity	short tons	Redacted	
US shipments value	dollars	Redacted	
US shipments unit value	dollars per short ton	Redacted	
Flag: US shipments unit value	Count	Redacted	
Net sales value	dollars	Redacted	No
Cost of goods sold (COGS)	dollars	Redacted	No
Gross profit or (loss)	dollars	Redacted	
Selling, general and administrative(SG&A) expenses	dollars	Redacted	No
Operating income or (loss)	dollars	Redacted	
COGS as share of net sales	Percent	Redacted	
Operating income or (loss) as share of net sales	Percent	Redacted	

Note: Certain firm specific data (non-summation elements) and narrative explanations contained on confidential version of this page are redacted from this page and not replicated.

EXHIBIT 2

**BUSINESS PROPRIETARY DOCUMENT
NOT SUSCEPTIBLE TO SUMMARIZATION**