Effects of Trade Barriers on Foreign Direct Investment: Evidence from Chinese Solar Panels

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The recent unprecedented return to protectionism (Fajgelbaum et al. (2020)) will affect the international economy beyond the short run. Analyzing similar events from the past can help us envision the long-lasting effects. What are some unintended consequences of trade barriers in strategic economic sectors? I study the Anti-Dumping and Countervailing Duties (AD-CVD) implemented by the Obama Administration in 2012 against the imports of solar panels from China. Leveraging the variation given by the policy's discriminatory nature, I develop a difference-in-differences design. I estimate the effect on Foreign Direct Investment (FDI) decisions by firms using a Poisson Pseudo-Maximum Likelihood method and data on FDI announcements from 2009 to 2015. My findings show that in 2012, firms granted a specific rate increase FDI by 67 million dollars per month, from a previous average of three million dollars. These results are for greenfield investment and not mergers and acquisitions. Firms also reduce their number of projects for two years after the policy. I use location choice models to test different hypotheses behind the FDI location decisions. I find evidence of production fragmentation in Asia in 2015. Interestingly, a few years later these Asian countries become exporters of solar panels to the US, showing support for the export-platform hypothesis. These results document FDI diversion that modifies investment patterns in the short run and eludes the trade barriers in the medium run, weakening the effects of the protectionist policy.

Keywords: FDI, Anti-Dumping, US, China.

JEL Codes: F13, F14, F21, F23

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1 Introduction

An unprecedented return to protectionism involving large economies and important increases in tariffs and retaliations in a wide range of economic sectors has taken place since 2018 (Fajgelbaum et al. (2020)). On top of that, industrial policy is back on the scene (Aiginger and Rodrik (2020)). Many of the industrial policies implemented by developed nations are in the form of non-tariff barriers, which require granular evidence and a deep institutional context to have an adequate measurement of their effects (Lane (2020)). Studying previous similar experiences can help us envision the long-lasting effects of the most recent measures. What are some unintended consequences of trade barriers?

Solar panels, together with washing machines, were part of the first wave of the US tariffs in 2018 with the imposition of a 30% rate. However, the US solar panel industry was already benefiting from some type of protection from its main competitor China. In 2012, the US imposed Anti-Dumping and Countervailing Duties (AD-CVDs) against the import of Chinese solar cells and modules (panels). This is one of the largest remedy cases in the US and the first involving the renewable energy sector.

In this paper, I document this previous US experience implementing non-tariff barriers in a strategic economic sector. I study how these measures impact Foreign Direct Investment (FDI) decisions by multinational firms in a context where a nationalist industrial policy clashes with international climate change commitments.

Specifically, I study how the AD-CVDs imposed by the US modify FDI decisions by targeted Chinese firms and what are the main economic motivations for firms' reactions. Theory suggests several answers such as tariff-jumping, horizontal, vertical, and export platform FDI. Each of these hypotheses, although not mutually exclusive, represents a different set of locations that I test for.

AD-CVDs are frequently used forms of administered protection. The Anti-Dumping Agreement (Agreement on Implementation of Article VI of the GATT 1994), defines dumping as "the introduction of a product into the commerce of another country at less than its normal value." The World Trade Organization (WTO) Agreement on Subsidies and Countervailing Measures allows countries to launch their investigation and charge extra duty (countervailing duty) if they find that subsidized imports are hurting domestic producers. Both mechanisms aim at a particular product from a specific exporter. This characteristic

¹See definitions for ADD and CVD.

makes them a "leaky form of protection" (Irwin (2019)), and creates an interesting setting to analyze differential effects on firms. Most of the literature focuses on the effect of these barriers on trade flows, but less is known about their impact on FDI.

Leveraging the variation given by the policy's discriminatory nature, I rely on firm-level data to develop a difference-in-differences design. I estimate the effect on FDI decisions by Chinese firms using a Poisson Pseudo-Maximum Likelihood (PPML) method and data on greenfield FDI announcements from 2009 to 2015. This period considers three years before and after the change in policy.

I test for the different economic motivations why firms engage in FDI and how this affects their location decisions. I first approach this by estimating the probability of investing in different regions by year using Probit and Linear Probability Models. To further investigate if there is change in the geography of FDI driven by specific rate firms, I develop a Conditional Logit model of location choice.

My results show that specific rate firms increase FDI by 67 million dollars per month in 2012, the year the policy is implemented. This result is statistically significant and economically relevant since the average before the policy is three million dollars. Following this initial reaction to the policy, there is a decrease in the number of projects in the next two years. Specific rate firms reduce their announcements by an average of 53% in 2013 and 2014.

Theory suggests several economic motivations for FDI such as tariff-jumping, horizontal, vertical, and export platform FDI. Each of these hypotheses represents a different set of locations, although they are not mutually exclusive. Tariff-jumping FDI implies Chinese firms would build new plants in the US to serve the domestic market, I do not find evidence to support this hypothesis. Horizontal FDI suggests firms are investing to supply a new local market, I test this for Europe and do not find evidence of such behavior. Vertical FDI involves cross-country production fragmentation, I find evidence to support this in 2015 when specific rate firms increase their investment in Asia and develop new industry activities in the region. The export platform hypothesis means the objective of the new plants is to export to the US from a different country not affected by the trade barrier. Interestingly, the Asian countries that received FDI in 2015 become exporters of solar cells to the US a few years later, showing support for this hypothesis. These results document FDI diversion that avoids the trade barriers and hence weakens the effects of the protectionist policy in the medium run.

My paper contributes to the literature on the response of multinational firms to changes in bilateral trade conditions, particularly anti-dumping duties. I differentiate in that my focus is on FDI rather than trade flows. Flaaen et al. (2020) use ADDs against South Korea, Mexico, and China to estimate the price effect of US import restrictions on washing machines. Using country-level trade flows and firm-level import data, the authors find small changes in US prices explained by firms' production relocation strategies. They also show that firms' "country-hopping" behavior prevented the ADDs' objective of reducing imports. I depart from their approach in that I use an empirical strategy to test changes in FDI decisions by firms as a response to AD-CVDs.

I also contribute to the literature on the effects of temporary trade barriers implemented by the US. A study of US ADDs on Chinese imports by Bown et al. (2022) uses an instrumental variable approach to show the effects on supply chains. They find that this protection decreases imports and raises prices in targeted industries, harming domestic jobs due to the increasing costs for downstream producers. Bown and Crowley (2007) use theory and empirics to show that the US imposition of ADDs on Japanese imports deflects trade, while it depresses trade when imposed against a third country. Meanwhile, Bown and Crowley (2010) find that using the China safeguard by the US and the EU did not result in growing Chinese exports to third markets. Blonigen and Prusa (2015) provide a review of the effects of dumping and anti-dumping literature and find that trade diversion is the most common unintended effect of ADDs. A previous paper analyzing the effects of ADD on FDI is by Blonigen (2002). His results suggest that only multinational firms from industrialized countries engage in tariff-jumping FDI.

Similarly, my findings add to the studies of FDI location decisions by multinational firms. This literature defines "horizontal" FDI as investments in production facilities to serve the consumers in the foreign market, while "vertical" FDI involves cross-country production fragmentation (Helpman et al. (2004)). Avoiding trade barriers motivates horizontal FDI when the cost of installing and operating a new facility is lower than the trade costs. Vertical FDI relates to the creation of Global Value Chains (GVC) and is driven by differential factor prices between the home and the host country. The affiliate abroad assumes part of the production process and sells to the final market, instead of the parent company. Export-platform FDI refers to multinational firms that use their foreign affiliates to export to markets outside the host country. This decision depends on the differential costs of exporting and establishing a plant in the desired market. In the context of this

paper, exporting costs include the trade barrier. In Tintelnot (2017), the author develops a multicountry general equilibrium model of firms with export-platform affiliates facing fixed costs of foreign investment. The empirical results show the presence of large fixed costs to establish a foreign affiliate.

My paper also contributes to the growing empirical literature on US-China trade relations. By including non-tariff trade barriers, I show a broader picture of the US trade policy regarding China. As Bown (2021) describes, China has been a target for AD-CVDs from the US for a long time. Before the 2018 trade war, more than 7% of Chinese imports in the US were covered by AD-CVDs. Similar to Fajgelbaum et al. (2021), my findings show a global reallocation of resources and the creation of new investment patterns as a consequence of a US-China trade conflict.

2 Background: Chinese Solar Panels & the 2012 US Trade Barriers

In this section, I describe the photovoltaic value chain, the main characteristics of China's solar manufacturing industry, and the US imports of solar cells and modules during the period under analysis. I also provide an overview of the trade barriers enacted by the Obama Administration in 2012. I then argue that this setting presents several advantages for estimating the impact of trade barriers on FDI decisions by multinational firms.

2.1 The Photovoltaic Value Chain

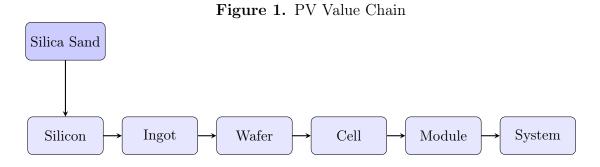


Figure 1 shows the different stages of the Photovoltaic (PV) value chain. The primary raw

material in the production process of solar panels is silica sand. This sand goes through a chemical process to obtain the high-purity silicon required for solar energy generation. The purified silicon is melted and formed into cylinders or bricks called ingots, which are then sliced into thin wafers. The process continues by adding metal conductors to the wafers' surface and creating the solar cell. Cells are soldered together and encapsulated in glass sheets to form a module. Combining the modules with equipment such as connectors and batteries constitutes a system.

2.2 Solar Panel Manufacturing in China

Indicators in Figure 3 contextualize the evolution of the Chinese solar panel manufacturing industry. During the period under analysis, this industry had an overall positive economic performance shown by revenue and industry value added (IVA). The slump in these indicators in 2012, after the protectionist measures in the US, is followed by a recovery outperforming previous years. However, exports and imports failed to recover their pre-2012 performance.

2.3 Solar Imports in the US

To provide context to my findings, I present US imports of the targeted products during the period of analysis. The left-hand-side panel of Figure 4 shows the customs value (in million dollars) and on the right-hand side the quantities (in million units).

The value of US imports of solar cells increased by 260% during this period. Although there was a reduction from 2012 to 2013, values recovered and surpassed previous levels by 2015. Until 2011, the last year without the ADD and CVDs, imports from China increased in value but declined afterward.

Import quantities also increased during this period though by a smaller amount (112%), suggesting an increase in prices. After reaching its highest point in 2011, imported quantities of solar cells decreased and did not reach previous levels. The number of imports from China decreased by 50% from 2011 to 2012, the year the antidumping and countervailing duties were imposed. These quantities remained below half the 2011 peak for the rest of the period.

2.4 The 2012 Solar Trade Barriers in the US

Figure 2. Timeline



On October 19, 2011, SolarWorld Industries America (the petitioner) started petitions on AD-CVDs on the import of crystalline silicon photovoltaic (CSPV) cells from China. Twenty days later, the US Department of Commerce (USDOC) initiated its investigations. Commerce is in charge of the AD-CVD determination, while the US International Trade Commission (USITC), an independent agency, examines whether a US industry has been materially injured. If the USITC's final determination is affirmative, Commerce issues the AD-CVD orders.

The USITC found that a domestic industry was "materially injured" by reason of imports of CSPV cells and modules from China that the USDOC determined are subsidized and sold in the United States at less than fair value". The results of the investigation showed that the US domestic industry faced a decline in market share due to the increasing import competition from China sold at low prices. Despite facing demand growth and cost reductions, the domestic industry was still not making a profit, showing a decline in many performance indicators, and reported, among other difficulties, the closure of production facilities. They find a "causal nexus" between subject imports and the poor condition of the domestic industry (USITC 2012).

The preliminary determinations were issued on March 26, 2012, for the countervailing case, and on May 25, 2012, for the anti-dumping case². On December 7, 2012, the USDOC issued the final duty orders³ on crystalline silicon photovoltaic cells whether or not assembled into modules imported from China (see the detail for HTSUS codes detail in Appendix Table 24).

For purposes of the US anti-dumping and countervailing duty laws, the USDOC defines

²See Federal Register for Preliminary ADD Order and Preliminary CVD Order

³See Federal Register for Amended Final ADD Order and Final CVD Order.

China as a non-market economy (NME). This means that the country does not operate on market principles of cost or pricing structures (Section 771(18) of the Tariff Act of 1930). In practice, this implies that for the dumping investigation process, the US administration has to rely on information on cost and price structures from a third country. In the case studied in this paper, the surrogate country was Thailand, as proposed by the petitioners (Chinese firms argued in favor of India).

Another relevant implication of the NME status of China is the determination of the dumping duty rates. For these types of economies, the USDOC presumes that all companies within the country are subject to government control. Hence, they are all assigned a single rate unless they can demonstrate sufficient independence from the government. If that is the case, the firm can be granted a separate rate. In the case under study, 68 companies applied for a separate rate. This rate is calculated by the USDOC as an average of the dumping margins estimated for the individual exporters and producers. In this case, it is 24.48% for 94% of the firms. See complete list of companies granted separate rates and duties in the Appendix.

Meanwhile, the "PRC-wide" rate applies to all other Chinese exporters and producers in this industry not specifically listed. The determination of the rate, in this case, was based on what is called "Adverse Facts Available" (AFA) because the PRC-wide entity did not respond to the USDOC requests for information. It is the policy of the Department in cases in which entities fail to cooperate, to establish a rate high enough "that the party does not obtain a more favorable result by failing to cooperate than if it had cooperated fully." The USDOC selected as AFA the highest margin alleged in the petition by Solar World Americas: 249.96%. ⁴

The other investigation started by the petition resulted in the USDOC determining that countervailable subsidies were provided to Chinese producers and exporters of CSPV cells. The investigation covered 31 government programs during the year 2010. The results were CVD rates of 15.4% on average (see full detail in the Appendix).

In summary, an average 40% AD-CVD rate was charged to firms granted a separate rate, while the PRC-Wide entity had a total of approximately 265%. This differential exposure to the policy is the basis of the research design in this paper.

AD-CVD orders are in place for five years after which Commerce conducts a sunset review to determine whether the order should remain in effect or not. In this case, the

⁴See details on Final ADD Order

USDOC found that the revocation would lead to dumping margins of up to 249.96 %, hence the orders remained in place. ⁵

2.5 Advantages of this Policy Setting

This policy presents several advantages for the study of FDI decisions by multinational firms. First, the fact that there were specific duties for some firms makes this a very interesting setting. The discriminatory nature of the policy allows for analyzing the characteristics of the firms that, as a response, modify investment choices. It also helps identify how the geography of production fragmentation can restructure after a shock.

Second, changes in AD-CVDs can be interpreted as economically exogenous. These are determined by the US, and outside commercial relations between the Chinese firms and the FDI destination countries. Thus, this identification strategy helps overcome the endogeneity of trade policy, a key empirical challenge in estimating the causal impacts of trade barriers (Goldberg and Pavcnik (2016)).

Furthermore, the production process in the solar panel industry has differentiated stages that allow for analyzing cross-country production fragmentation as a response to an external shock.

Finally, this setting permits estimating the long-term effects of trade barriers and FDI decisions, something that the studies of the recent US-China trade war are still unable to assess.

3 Data

In this section, I describe the data I use for my estimations.

3.1 FDI: Greenfield Investments

The source for Foreign Direct Investment information is fDi Markets. This dataset tracks announcements on cross-border greenfield investment, defined as a new physical project or expansion of an existing one that creates jobs and capital investment. It includes monthly data on capital investment and other relevant variables at the firm level across all sectors

⁵See sunset review

and countries.⁶ I use data from 2009 to 2015, considering 2011 as the last year without policy effects.

The original dataset shows an observation for each firm making an investment announcement. I modify this to organize the data as a panel where each firm appears every month of every year. If it does not make an announcement, the FDI variable is set to zero. This is because not making an FDI announcement is also economically relevant and gives information for the estimations. Table 1 shows the summary statistics for this data arrangement.

I use other variables in the dataset as controls and left-hand-side variables, such as the number of jobs created by the announcement, and the number of projects per firm. I use the information on industry activity shown in Table 2 to estimate which are the most common activities in the new projects.

Figure 5 shows the frequency at which countries appear in the dataset as investment destinations before and after the policy. Some patterns arise. First, firms are investing in a wider range of locations, as more countries appear on the map. Second, there seems to be a change in the location of FDI, with new world regions as destinations. I look into this by investigating firms' location choices. Motivated by these stylized facts, I test for changes in location patterns.

3.2 Mergers and Acquisitions

I use data from Thomson and Reuters covering the period from 2009 to 2014 to analyze the impact of the AD-CVDs on Mergers and Acquisitions. I identify in this dataset the specific-rate firms and the control firms as defined in the fDi markets dataset, and construct a firm-year panel.

Table 4 shows that during this period, most of the M&A activity by these multinational firms is domestic, mainly China followed by Germany. When considering cross-country M&A activity, China becomes a relevant acquirer in the UK and the US.

To understand if this is horizontal or vertical M&A, table 5 shows the industry activities by target and acquirer company. The most frequent types of deals share the same activity,

⁶List of variables: Project Date, Investing Company, Parent Company, Source Country, Source State, Source City, Destination Country, Destination State, Administrative Region, Destination City, Industry Sector, Sub-Sector, Cluster, Industry Activity, Capital Investment Estimated, Jobs Created Estimated, Project Type.

Electronic and Electrical Equipment, indicating a horizontal integration. The most common vertical integration is done by Investment and Commodity firms that target companies in Electronic and Electric Equipment activities.

3.3 Financial Information

I use Refinitiv to find the financial summaries for the publicly traded firms in my FDI dataset. I collect variables such as Capital Expenditure (CapEx); Gross Profit Margin; Earnings before interest, taxes, depreciation, and amortization (EBITDA); Return on Average Total Assets (ROAA); Total Debt Percentage of Total Assets (DEBTA); Assets; and Revenue. I include a means test on these variables and include those that are different between groups before the policy as control variables in my robustness checks.

3.4 Specific-Rate Firms and Control Firms

The final determinations issued by the Federal Register include the list of firms granted a specific rate by the anti-dumping and countervailing duties. These are exporters and producers, and the list includes subsidiaries. I identify 62 unique firms.

I call "specific-rate firms" those granted the separate rate that I identify in my dataset. I find 25 of them which represent 40% of the firms listed in the Federal Register. To define the control group, I select the firms that operate in the same economic activities as the specific rate ones, and that made FDI announcements between 2009 and 2015. I find 52 companies that were not listed by the Federal Register. I end up with 185 observations that represent monthly investment announcements by 77 unique firms. This means the total observations in my dataset is 6468 (77 firms x 12 months x 7 years).

In the Refinitiv data, I find 26 specific rate and 14 control firms.

Table 6 shows the results for the means differences test in the FDI data, while table 7 does the same for the financial data. I include the financial variables that show statistical differences for the two groups before the policy as control variables in my robustness checks.

⁷Cluster: Environmental Technology; Industry Sector: Electronic components, Renewable energy; Sub Sector: All other electrical equipment and components, Solar electric power.

4 Empirical Framework

In this section, I discuss my empirical strategies to estimate the effect of trade barriers on FDI decisions by firms. I also analyze some threats to identification from this strategy.

4.1 Estimation Strategy: FDI Amounts and Projects

Using data on FDI announcements from 2009 to 2015, I leverage the variation given by ADDs and CVDs' discriminatory nature to estimate their impact. I develop a difference-in-differences design where the treatment are the specific rate on the duties the US imposed on the imports of Chinese solar cells and modules in 2012.

Since FDI data tends to be heteroskedastic and have a large presence of zeros, when these models are log-linearized and estimated by OLS the results are biased estimations of elasticities (Santos-Silva (2006)). To overcome this, my specification is a multiplicative model and I estimate the coefficients using a Poisson Pseudo-Maximum Likelihood (PPML) method.

$$Y_{it} = exp\left[\sum_{s=2009}^{2015} \delta_s(D_i \times 1[t=s]) + \beta \mathbf{X}_{it} + \gamma_i + \lambda_t\right] \eta_{it}.$$
 (1)

Where Y_{it} is the outcome of interest (FDI in levels, aggregation is monthly or yearly) for a firm i in period t; D_i is the indicator for treated firms; X_{it} are control variables (number of projects, jobs created, or financial variables such as log of assets); γ_i are firm fixed effects; λ_t are time fixed effects (month and year, or year, depending on the aggregation level); and η_{it} is the error term. Robust standard errors are clustered at the firm level.

To test for a change in announcements, I use the same specification as in equation 1 and modify the dependent variable for the number of projects per year per firm.

4.1.1 Threats to Identification

I analyze the parallel trends assumption, i.e. if the pre-treatment trajectories for the specific rate and control units are parallel. For this, I use an OLS estimation method in equation 2 using the Stata did-regress package. This allows for a graphical diagnosis in Figure 8. It also provides a test on the linear-trends model coefficient that captures the differences in the trends between both groups. If the coefficient is zero, there are no differences in the slopes. In Table 8 I show the results for this test and do not reject the hypothesis that the

linear trends are parallel in the pre-treatment period.

$$Y_{it} = \delta d_{it} + \gamma_i + \lambda_t + \varepsilon_{it}. \tag{2}$$

Where Y_{it} is the outcome of interest (FDI amount, number of projects), for a firm i in year t; d_i is the indicator for treatment (equals to one after 2012 for firms granted a specific rate firms); γ_i are firm fixed effects; λ_t are year fixed effects; and ε_{it} is the error term. Robust standard errors are clustered at the firm level.

4.2 Estimation Strategy: Location Choice

Motivated by the changes in patterns shown in the data and figure 5, I estimate the differential effects by year on the probability of firms investing in each region. I compute the probability of specific industry activities impacting the probability of investment. Then, I fit a model of location choice to test if these effects are specific for firms granted a specific rate that modified their FDI location choices as a response to the AD-CVDs.

I estimate equation 3 using linear probability and Probit models.

$$Y_{it} = \delta Y ear + \beta X_{it} + \gamma_i + \epsilon_{it}. \tag{3}$$

Where Y_{it} is the probability of investing in a particular region for a firm i in year t; Y_{ear} is a year dummy from 2009 to 2015; X_{it} controls for FDI amounts, number of projects, or jobs created; γ_i in the Probit model is firm control and a firm fixed effect in the linear probability specification; and ϵ_{it} is the error term. Robust standard errors are clustered at the firm level.

To understand if this behavior is specific to firms granted a specific rate, I estimate a model of location choice using McFadden's alternative-specific Conditional Logit model (McFadden 1973). In this model, individuals choose the option with the greatest utility. I modify the original structure of the fDi markets data to fit this model. For each month-year, each firm has six options for where to invest: Asia, Europe, North America, Africa, Latin America, or Oceania. If a firm makes more than one investment per month, I order the projects by FDI amount and number of jobs created. The location choice is given by the region of the project of the larger magnitude. This creates a set of alternatives is J=1,...,6. An indicator y_{ijt} equals one if firm i chooses alternative j in period t, and zero otherwise.

There are q case-specific variables (if the firm is granted a specific rate, year, FDI amount, and number of projects per month). The focus of my estimations is to identify location choices by the characteristics of the firms and projects (cases), rather than of the regions (alternatives). My aim is to find if firms granted a specific rate make a different location choice than control firms. Hence, I do not include alternative-specific variables since all firms face the same region characteristics when they make their location choice and what is relevant in this case is the difference among the two groups of firms. The specification for this random utility is presented in equation 4.

$$u_{it} = (z_i A)' + v_{it}. (4)$$

Where u_{it} is the utility for firm i in month-year t, $A = (\alpha 1, ..., \alpha 6)$ is a qxJ matrix of case-specific regression coefficients; the error term v_{it} are independent random variables with a type I extreme-value Gumbel distribution (StataCorp. 2023).

To investigate if the type of industry activity developed by the project impacts the probability of investing in a particular region after the policy, I estimate the equation 5 using a Linear Probability Model.

$$Y_{it} = \delta Post * Activity_{it} + \alpha_1 Post + \alpha_2 Activity_{it} + \beta X_{it} + \gamma_i + v_{it}.$$
 (5)

Where Y_{it} is the probability of investing in one of the six regions; Post equals to one if the year is after 2011; Activity is a dummy for the industry activities in the dataset; and X_{it} controls for FDI amounts or the number of projects; γ_i are firm fixed effects; v_{it} is the error term. Robust standard errors are clustered at the firm level.

5 Results: The Effects of Trade Barriers on FDI

In this section, I describe my empirical findings.

5.1 Increase in FDI amounts

The difference-in-differences interpretation refers to the first difference between firms receiving a specific rate and the control firms, and the second difference before and after the trade barriers are applied.

Table 9 shows the results of my main estimations using a PPML method. This is an exponential model where the dependent variable is measured in levels and the right-hand-side treatment variable is an indicator taking the value zero or one. Hence, the coefficients δ are the semi-elasticities estimated over time. To normalize the results, the estimations exclude the year before the treatment (2011), as is commonly done in the literature (Sun and Abraham (2021)).

The first column shows the estimations for the benchmark model, with no controls. The following two columns control for the number of jobs created and the number of projects. I find a statistically significant positive effect of the trade barriers on FDI amounts at the monthly level in the year of the policy (2012) for the three specifications. When controlling for the number of projects, I also find significant effects in 2015. These results are economically significant as we can see in table 10, representing 67 million dollars per month in the benchmark model.

The following specification shows the total amounts of FDI by a firm by year, controlling for a different set of financial variables. The main results from the previous specification are the same, meaning there is an increase in FDI levels in 2012.

5.2 Decrease in the Number of Projects

Trade barriers might also affect the number of projects specific rate firms are willing to carry out. When considering firms that announce more than one investment per year, I find a statistically significant reduction in the number of projects two years after the policy was in place (2013 and 2014). This represents a reduction of 53% in the benchmark model. This might reflect firms being more cautious after being affected by the US trade barriers. I also find that specific rate firms had an average of 45% more projects than control firms in 2010 before the policy was implemented.

5.3 Change in Location Choice

Does the probability of investing in a specific region change after the policy? I first approach this question estimating equation 3 to find if there is a particular effect of each year in the probability of investing in the three relevant regions in the sample: the US, Europe, and Asia.

The estimations for the probit model are presented in Table 14, and for the linear probability models in Table 15. The results show that there is not a change in the probability of specific rate firms investing in the US by year, showing no evidence of tariff jumping behavior⁸. Meanwhile, investment in Europe decreases after the policy. There is no evidence to support a hypothesis of Chinese firms increasing their investment in Europe to substitute for the loss of the US market. Finally, the probability of investing in Asia rises after the policy and is statistically significant in the year 2015. This leaves space for vertical and export platform FDI.

Table 16 presents the marginal effects for the conditional logit model of location choice in 2015 controlling for FDI amounts, and Table 17 does the same controlling for the number of projects per month. In the first panel, we observe a positive and significant effect for Asia in both specifications and a negative effect for Europe. The second panel shows a statistically significant difference between the location choices of the two groups.

I move to the vertical FDI hypothesis and estimate equation 5 for Asia, which is the region where we see a significant effect. In Table ?? I find that manufacturing, and electricity affect the likelihood of investing in Asia after the policy. Hence pointing in the direction of a new structure of cross-border activities for specific rate firms.

To understand if the export platform hypothesis applies in this case, I take a deeper look into the data. Figure 19 depicts the number of FDI projects in Asia by all firms in the sample. The pattern shows an increase in the number of projects in this region in 2014 by control firms and in 2015 by specific-rate firms. Considering the destination countries in Figures 20 and 21 we can see the different countries where these two groups of firms choose to locate their new plants. I then look into the US imports of solar cells by source country in Figure 22. Interestingly, some of the Asian countries that received FDI from specific-rate firms became exporters of solar cells to the US a few years later, such as Japan, Thailand, and the Philippines. This shows initial support for the export platform hypothesis.

6 Robustness Checks

To include the financial controls, I estimate the same model as equation 1 with yearly variables. The results are in table 23. The change in the number of observations is due

⁸The year 2013 cannot be estimated due to lack of enough observations.

to the different availability for each variable. I still find a significant and positive effect in 2012 as in my benchmark model for all specifications except when controlling for ROAA. There are also significant effects in 2015 with CapEx as a control variable.

7 Summary and Concluding Remarks

Analyzing the case of the Anti-Dumping and Countervailing Duties implemented by the Obama administration in 2012 against imports of Chinese solar panels. Leveraging the variation given by the policy's discriminatory nature, I test for the change in Foreign Direct Investment decisions by firms granted a specific rate.

My findings show that in 2012, firms granted a specific rate increase FDI by 67 million dollars per month, from a previous average of three million dollars. These results are for greenfield investment and not mergers and acquisitions. Firms also reduce their number of projects for two years after the policy.

I use location choice models to test different hypotheses behind the location choice decisions. I show that the increase in FDI does not correspond to tariff-jumping or horizontal FDI. I find evidence of production fragmentation in Asia in 2015. I find support for the export platform FDI hypothesis in the medium run after countries that were FDI destinations for Chinese companies receiving a specific rate become exporters to the US a few years after the policy.

These results document FDI diversion that modifies investment patterns in the short run and eludes the trade barriers in the medium run, weakening the effects of the protectionist policy.

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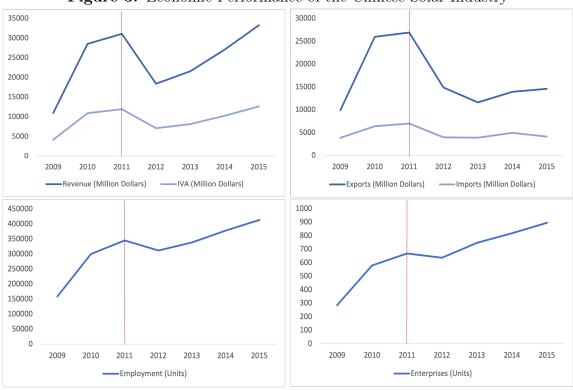
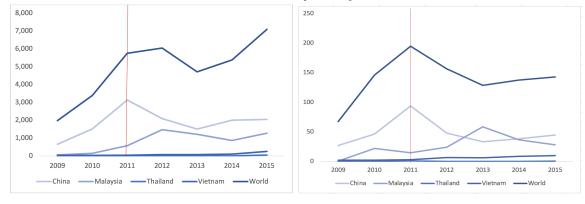


Figure 3. Economic Performance of the Chinese Solar Industry

Source: IBISWorld

Figure 4. US Imports of Solar Cells Value & Quantity



Source: USITC

Figure 5. Frequency of Destination Countries pre and post-policy

Table 1. Summary Statistics

Variable	Obs	Mean	Std. dev.	Min	Max
fdi	6,468		49.4	0	2000
jobs projects	6,468 $6,468$	$3.9 \\ 0.03$	$71.0 \\ 0.2$	0	3000 4

Table 2. Activities by Project

Industry Activity	Percent
Sales, Marketing & Support	43
Electricity	21
Manufacturing	15
Headquarters	14
Design, Development & Testing	4
Logistics, Distribution & Transportat	4
Total	100

Table 3. Projects by Region

Region	%
Europe	43
Asia	31
North America	11
Africa	8
Oceania	4
Latin America & Caribbean	3

Table 4. M&A country-pairs

Target	Acquiror	% of deals
China	China	27
Germany	Germany	10
United Kingdom	China	10
Germany	Unknown	7
Hong Kong	Hong Kong	7
United States	China	7
Germany	China	3
United Kingdom	Germany	3
Romania	China	3
Romania	Luxembourg	3
South Korea	South Korea	3
Italy	Germany	3
Italy	China	3
Italy	Italy	3
Liechtenstein	Hong Kong	3
Singapore	Singapore	3

 Table 5. M&A Industry Activities

Target	Acquiror	% of deals
Electronic and Electrical Equipment	Electronic and Electrical Equipment	40
Electronic and Electrical Equipment	Investment & Commodity Firms, Dealers, Exchanges	20
Electronic and Electrical Equipment	Electric, Gas, and Water Distribution	7
Investment & Commodity Firms, Dealers, Exc.	Electronic and Electrical Equipment	7
Electric, Gas, and Water Distribution	Electronic and Electrical Equipment	7
Electric, Gas, and Water Distribution	Investment & Commodity Firms, Dealers, Exchanges	3
Electric, Gas, and Water Distribution	Electric, Gas, and Water Distribution	3
Machinery	Electronic and Electrical Equipment	3
Construction Firms	Electric, Gas, and Water Distribution	3
Wholesale Trade-Durable Goods	Electronic and Electrical Equipment	3
Metal and Metal Products	Metal and Metal Products	3

Table 6. Mean Differences Test: FDI data

PRE-POLICY					POST-POLIC	CY			
		control	$specific \hbox{-} rate$	$\it diff$	$t ext{-}stat$	control	$specific \hbox{-} rate$	$\it diff$	t-stat
	obs.	1,872	900			2,496	1,200		
fdi (mill.USD)	mean std. dev.	$1.23 \\ 26.12$	0.75 8.36	0.48	0.54	$3.75 \\ 58.07$	6.72 70.79	-2.97	-1.35
jobs	mean std. dev.	2.32 62.03	2.10 18.07	0.22	0.10	2.35 30.45	11.01 137.55	-8.66	-3.00
projects	mean std. dev.	0.02 0.18	0.05 0.25	-0.03	-3.70	0.03 0.21	0.05 0.26	-0.02	-3.14

Table 7. Mean Difference Test: Financial Data

	PRE-POLICY				POST-POL	ICY			
		control	$specific\mbox{-}rate$	diff	t-stat	control	$specific\mbox{-}rate$	diff	t-stat
CanFr	mean	115.87	200.15	-84.27	-1.50	79.5	70.5	9.0	0.4
CapEx	std. dev.	136.02	282.94			95.2	113.4		
	obs	32	33			49	32		
Profit Mg	mean	27.65	25.20	2.46	0.41	7.9	17.3	-9.4	-0.8
r ront mg	std. dev.	17.11	29.95			57.9	36.6		
	obs	32	34			50	33		
EBITDA/Assets	mean	0.09	0.05	0.03	0.99	0.05	0.003	0.04	2.2
EDITDA/ Assets	std. dev.	0.17	0.07			0.1	0.1		
	obs	33	31			50	32		
ROAA	mean	8.99	0.76	8.23	1.76	-2.0	-40.4	38.4	1.1
NOAA	std. dev.	25.20	16.06			14.8	252.9		
	obs	32	46			48	51		
DEBT/Assets	mean	25.35	31.98	-6.64	-1.32	25.5	44.0	-18.6	-3.4
DED1/Assets	std. dev.	22.01	16.96			18.2	29.7		
	obs	31	30			47	29		
Log Assets	mean	6.32	6.07	0.25	0.69	6.73	6.57	0.16	0.53
Log Assets	std. dev.	1.87	1.52			1.66	1.39		
	obs	34	54			50	50		

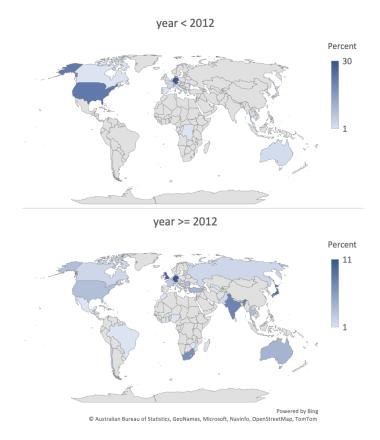


Figure 6. Pre-trends: fdi, projects

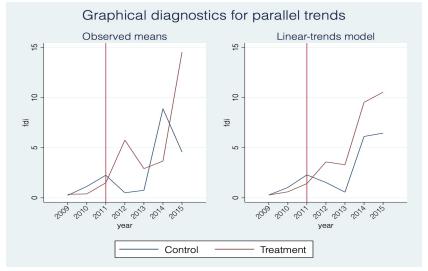


Table 8. Parallel-trends test (pre-treatment time period)

H0: Linear trends are parallel						
	fdi	projects				
$\overline{F(1, 77)} = Prob > F$	$0.25 \\ 0.62$	0.09 0.76				

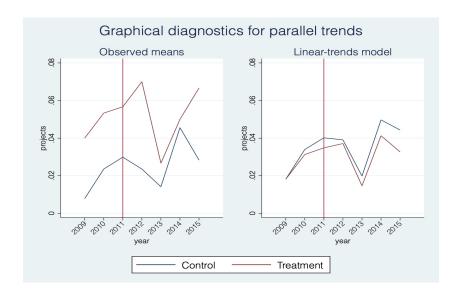


Figure 7. Probability of Investing in the US, Europe, and Asia.

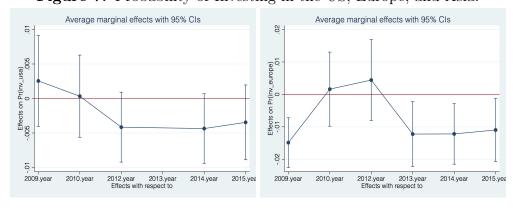


Table 9. Effects of Trade Barriers on FDI

	(1)	(2)	(3)
	fdi	fdi	fdi
specific-rate*2009	0.810	0.826	-0.321
	(1.267)	(1.258)	(1.249)
specific-rate*2010	-0.662	0.223	-0.215
	(1.238)	(1.780)	(1.217)
specific-rate*2012	2.838**	2.464**	2.352*
	(1.197)	(1.034)	(1.243)
specific-rate*2013	1.762	1.795	2.281
	(1.209)	(1.177)	(1.640)
specific-rate*2014	-0.478	-0.303	0.985
	(1.156)	(1.173)	(1.221)
specific-rate*2015	1.566	0.983	2.393*
	(1.078)	(1.417)	(1.301)
Fixed Effects			
Firm	\checkmark	\checkmark	\checkmark
Month	\checkmark	\checkmark	√ √
Year	\checkmark	\checkmark	\checkmark
Controls			
Jobs		\checkmark	
Projects			✓
N	6552	6552	6552
Pseudo R2	0.374	0.476	0.762

Table 10. Dollar Amount (millions)

	(1)	(2)	(3)
specific-rate*2012 specific-rate*2015	67	45	40 41
mean fdi treate	ed firn	ns	4.16

 $[\]begin{array}{l} {\rm Standard\ errors\ in\ parentheses}\\ {*\ p<0.10,\ ^{**}\ p<0.05,\ ^{***}\ p<0.01} \end{array}$

Table 11. Effects of Trade Barriers on M&A

	(1)	(2)
	m_a	m_a
specific-rate*2009	-1.179* (0.674)	-1.766** (0.803)
specific-rate*2010	1.371 (0.996)	1.147 (1.014)
specific-rate*2012	-1.412** (0.707)	-1.248 (0.896)
specific-rate*2013	-0.750 (0.726)	-0.778 (0.823)
specific-rate*2014	-0.129 (0.706)	0.133 (0.869)
N	1440	1440
Pseudo \mathbb{R}^2	0.309	0.338
Fixed Effects		
Firm	\checkmark	\checkmark
Month	√ √	\checkmark
Year	\checkmark	\checkmark
Controls		
Complete	\checkmark	\checkmark
Cross Border		\checkmark

Standard errors in parentheses * p < 0.10, ** p < 0.05, *** p < 0.01

Table 12. Effects of Trade Barriers on Number of Projects (>1)

	(1)	(2)	(3)
	sum projects	sum projects	sum projects
specific-rate*2010	0.371***	0.346**	0.394**
	(0.142)	(0.163)	(0.158)
specific-rate*2012	-0.0118	-0.0153	0.0215
	(0.208)	(0.210)	(0.205)
specific-rate*2013	-0.755***	-0.720***	-0.839**
	(0.205)	(0.162)	(0.356)
specific-rate*2014	-0.753***	-0.756***	-0.795***
	(0.239)	(0.234)	(0.175)
specific-rate*2015	-0.159	-0.195	-0.198
	(0.335)	(0.353)	(0.357)
N	540	540	540
$PseudoR^2$	0.103	0.103	0.105
Fixed Effects			
Firm	\checkmark	\checkmark	\checkmark
Year	\checkmark	\checkmark	\checkmark
Controls			
Jobs		✓	
FDI			\checkmark

Standard errors in parentheses

Table 13. Number of projects (%)

	(1)	(2)	(3)
specific-rate*2010	45	41	48
specific-rate*2013	-53	-51	-57
specific-rate*2014	-53	-53	-55
mean annual proj	jects tr	eated firms (>1)	2.57

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

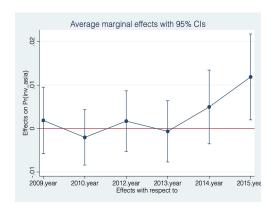


Table 14. (Probit) Probability of Investing in

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	USA	USA	USA	Europe	Europe	Europe	Asia	Asia	Asia
year=2009	0.086 (0.190)	0.235 (0.231)	$0.066 \\ (0.193)$	-0.619*** (0.187)	-0.637*** (0.241)	-0.634*** (0.190)	0.116 (0.242)	0.654 (0.563)	0.146 (0.246)
year=2010	-0.056 (0.202)	-0.108 (0.277)	-0.094 (0.208)	$0.035 \\ (0.125)$	0.113 (0.150)	$0.008 \ (0.128)$	-0.179 (0.275)	-0.188 (0.759)	-0.474 (0.411)
year=2012	-0.497 (0.339)	-0.547 (0.432)	-0.515 (0.339)	0.091 (0.128)	0.188 (0.151)	0.085 (0.129)	0.107 (0.229)	0.534 (0.555)	0.0822 (0.238)
year=2013				-0.421** (0.198)	-0.427 (0.318)	-0.398** (0.196)	-0.0479 (0.268)	0.437 (0.588)	-0.193 (0.311)
year=2014	-0.552 (0.374)	-1.314 (1.120)	-0.518 (0.338)	-0.419** (0.165)	-0.603* (0.332)	-0.319** (0.162)	0.255 (0.230)	0.751 (0.545)	0.306 (0.240)
year=2015	-0.350 (0.293)	-0.414 (0.430)	-0.367 (0.300)	-0.353** (0.172)	-0.448 (0.282)	-0.335** (0.165)	$0.437^{**} (0.211)$	1.047^{**} (0.493)	0.405^* (0.215)
	5616 0.053	5616 0.416	5616 0.047	$6552 \\ 0.074$	$6552 \\ 0.526$	6552 0.046	$6552 \\ 0.169$	6552 0.548	6552 0.284
Controls Firm ID	fdi ✓	projects ✓	jobs ✓	fdi ✓	projects ✓	jobs ✓	fdi ✓	projects ✓	jobs ✓

Standard errors in parentheses

NOTE: This table shows the results for the Probit estimations based on equation 3. Coefficients show the marginal effects for treated firms. Robust standard errors are clustered at the firm level.

Table 19. FDI in Asia by All Firms in the Sample

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

Table 15. (LPM) Probability of Investing in

	(1) USA	(2) USA	(3) USA	(4) Europe	(5) Europe	(6) Europe	(7) Asia	(8) Asia	(9) Asia
year=2009	0.003 (0.007)	0.004 (0.007)	0.003 (0.007)	-0.009 (0.007)	-0.006 (0.006)	-0.010 (0.007)	-0.002 (0.011)	0.000 (0.009)	-0.003 (0.011)
year=2010	$0.003 \\ (0.007)$	0.004 (0.007)	$0.003 \\ (0.007)$	$0.007 \\ (0.011)$	0.007 (0.009)	$0.006 \\ (0.011)$	-0.012 (0.009)	-0.012* (0.006)	-0.013 (0.009)
year=2012	-0.007 (0.006)	-0.008 (0.006)	-0.007 (0.007)	0.011 (0.012)	$0.009 \\ (0.009)$	0.013 (0.012)	-0.004 (0.009)	-0.003 (0.010)	-0.002 (0.010)
year=2013	-0.010* (0.005)	-0.007 (0.005)	-0.010* (0.005)	-0.007 (0.011)	0.002 (0.009)	-0.006 (0.011)	-0.011 (0.010)	-0.002 (0.007)	-0.010 (0.009)
year=2014	-0.010^* (0.005)	-0.009* (0.005)	-0.010^* (0.005)	-0.010 (0.009)	-0.008 (0.008)	-0.010 (0.010)	-0.008 (0.008)	-0.005 (0.007)	-0.006 (0.009)
year=2015	-0.010^* (0.005)	-0.011* (0.005)	-0.011* (0.006)	-0.020*** (0.007)	-0.019*** (0.006)	-0.017*** (0.007)	0.014 (0.013)	0.023** (0.010)	0.012 (0.013)
$\frac{N}{\text{Within}R^2}$	2184 0.006	2184 0.113	2184 0.008	2184 0.024	2184 0.311	2184 0.006	2184 0.169	2184 0.312	2184 0.187
Firm fixed effects Controls	√ fdi	√ projects	√ jobs	√ fdi	√ projects	√ jobs	√ fdi	√ projects	√ jobs

Standard errors in parentheses

NOTE: This table shows the results for the Linear Probability Model estimations based on equation 3. The sample is restricted to treated firms. Robust standard errors are clustered at the firm level.

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

 ${\bf Table~16.~Location~Choice~in~2015:~Conditional~Marginal~Effects}$

0.specific-rate	(base outo	come)				
1.specific-rate _outcome	dy/dx	std. err.	Z	P>z	[95% cc	onf. interval
Asia	0.398	0.150	2.650	0.008	0.104	0.692
Europe	-0.404	0.118	-3.430	0.001	-0.635	-0.174
North America	-0.117	0.078	-1.490	0.135	-0.270	0.036
Africa	0.058	0.097	0.600	0.549	-0.132	0.248
Latin America & Caribbean	0.065	0.064	1.020	0.309	-0.060	0.190
Oceania	0.000	0.000	0.000	1.000	0.000	0.000
	Delta-met	hod				
	Contrast	std. err.	${f z}$	$P{>}z$	[95% cc]	onf. interval]
Outcome: Asia						
specific-rate $(1 \text{ vs } 0)$	0.348	0.150	2.320	0.020	0.054	0.641
Outcome: Europe						
specific-rate (1 vs 0)	-0.405	0.115	-3.520	0.000	-0.630	-0.179
Control variable: FDI amounts						

Table 17. Location Choice in 2015: Conditional Marginal Effects

0.specific-rate	(base outo	come)				
1.specific-rate _outcome	$\mathrm{d}y/\mathrm{d}x$	std. err.	z	P>z	[95% cc	onf. interval
Asia Europe North America	0.367 -0.405 -0.119	0.150 0.117 0.079	2.440 -3.460 -1.510	0.015 0.001 0.130	0.073 -0.635 -0.274	0.661 -0.175 0.035
Africa Latin America & Caribbean Oceania	$0.050 \\ 0.107 \\ 0.000$	0.092 0.072 0.000	0.540 1.480 0.000	0.586 0.138 1.000	-0.130 -0.035 0.000	0.230 0.249 0.000
	Delta-met	hod				
	Contrast	std. err.	Z	P>z	[95% co	onf. interval
Outcome: Asia specific-rate (1 vs 0)	0.361	0.148	2.440	0.015	0.071	0.650
Outcome: Europe specific-rate (1 vs 0)	-0.406	0.114	-3.560	0.000	-0.630	-0.182
Control variable: number of projects per month						

Table 18. Vertical FDI

	(1) inv_asia	(2) inv_asia
Design, Dev. & Testing	0.308*** (0.009)	0.218 (0.177)
Electricity	0.978*** (0.007)	0.903*** (0.135)
Headquarters	0.238** (0.109)	0.134 (0.240)
Logistics, Dist. & Transp.	0.325 (0.277)	0.209 (0.173)
Manufacturing	-0.010*** (0.004)	-0.090 (0.132)
Sales, Marketing & Supp.	0.233** (0.101)	0.130 (0.203)
post*Electricity	-0.713*** (0.123)	-0.575*** (0.101)
post*Head quarters	0.063 (0.148)	$0.108 \\ (0.166)$
post*Logistics, Dist.& Transp.	-0.332 (0.277)	-0.349 (0.281)
post*Manufacturing	0.650*** (0.122)	0.708*** (0.138)
post*Sales, Marketing & Supp.	0.044 (0.132)	0.047 (0.128)
$\frac{N}{R^2}$	2100 0.444	2100 0.424
Firm FE	✓	✓
Controls FDI Projects	✓	✓

Standard errors in parentheses * p < 0.10, ** p < 0.05, *** p < 0.01

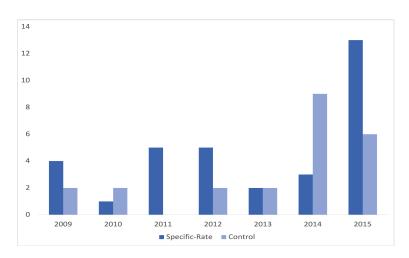


Table 20. FDI in Asia by Specific Rate Firms

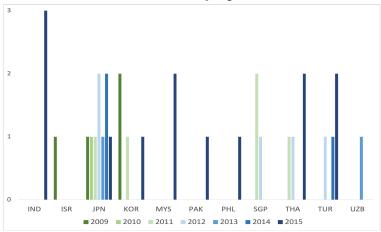


Table 21. FDI in Asia by Control Firms

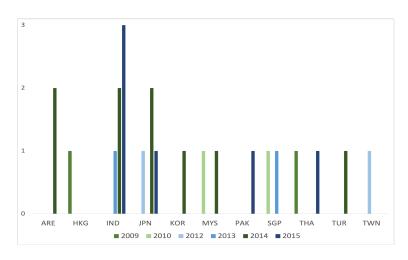


Table 22. US Imports of solar cells by Country 2012-2018

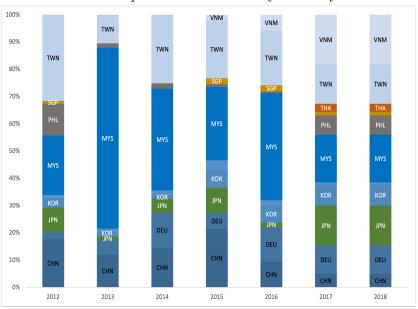


Table 23. Effects of Trade Barriers on FDI w/financials

	(1) FDI	(2) FDI	(3) FDI	(4) FDI
specific-rate*2009	-0.379 (-0.20)	-3.915** (-2.38)	-0.227 (-0.11)	-2.400 (-1.30)
specific-rate*2012	4.629** (2.54)	-0.475 (-0.28)	5.285*** (3.17)	6.609*** (3.26)
specific-rate*2013	1.667 (0.87)	-3.990** (-2.04)	1.892 (1.03)	2.378 (1.11)
specific-rate*2014	1.624 (0.87)	-7.307*** (-3.92)	0.812 (0.41)	-1.851 (-1.04)
specific-rate*2015	3.999** (2.15)	-2.078 (-1.30)	2.982 (1.50)	3.826** (2.00)
$ N $ Pseudo R^2	96 0.780	105 0.784	89 0.783	82 0.864
Fixed Effects Firms Year Controls	√ √	√ √	√ √	√ √
CapEx ROAA DEBTA	✓	✓	\checkmark	√ √ √

 $[\]begin{array}{c} t \text{ statistics in parentheses} \\ ^*p < 0.10, \ ^{**}p < 0.05, \ ^{***}p < 0.01 \end{array}$

Table 24. HTS Codes and Description

HTSUS	Description
8501.61.0000	AC generators (alternators) of an output not exceeding 75 kVA
8507.20.20	Other
8541.40.6020	Solar cells assembled into modules or panels
8541.40.6030	Solar cells, not assembled into modules or made up into panels
8501.31.8000	Generators

Table 25. Weight of imports by HTS Code (%)

HTSUS	8501.31.8000	8501.61.0000	8507.20.80	8541.40.6020	8541.40.6030
2008	0.2	7.5	48.4	42.9	0.9
2009	0.9	5.2	28.5	63.8	1.7
2010	0.5	1.9	18.3	76.9	2.3
2011	0.2	1.2	8.1	86.4	4.1
2012	0.2	1.5	11.2	85.9	1.2
2013	0.6	1.6	13.1	84.5	0.2
2014	0.7	1.3	14.1	82.0	1.9
2015	0.5	0.9	10.5	87.7	0.4
2016	0.3	0.5	6.5	92.1	0.6

8 Appendix

The most important product treated by the ADD is 8541.40.6020: Solar cells assembled into modules or panels. It represents the majority of the treated imports and experienced important growth during the period (from 43% to more than 90%)

Table 26. CVD Rates (%)

	Company	Subsidy
Trina Solar*	Changzhou Trina Solar Energy Trina Solar (Changzhou) Science and Technology	15.97
Wuxi Suntech	Wuxi Suntech Power Luoyang Suntech Power Suntech Power* Yangzhou Rietech Renewal Energy Zhenjiang Huantai Silicon Science & Technology Kuttler Automation Systems (Suzhou) Shenzhen Suntech Power Wuxi Sunshine Power Wuxi University Science Park International Incubator Yangzhou Suntech Power Zhenjiang Rietech New Energy Science & Technology	14.78
All others		15.24

^{*}Treated

	Exporter	Producer	Margin
	Shanghai BYD Co. Limited*	Shanghai BYD Co. Limited	24.48
	CNPV Dongying Solar Power*	CNPV Dongying Solar Power	24.48
	CEEG (Shanghai) Solar Science Tech.*	CEEG (Shanghai) Solar Science Tech	24.48
		CEEG Nanjing Renewable Energy	24.48
	CEEG Nanjing Renewable Energy	CEEG Nanjing Renewable Energy	24.48
	China Sunergy (Nanjing)*	China Sunergy (Nanjing)	24.48
	Chint Solar (Zhejiang)*	Chint Solar (Zhejiang)	24.48
	ET Solar Industry Limited*	ET Solar Industry Limited	24.48
	Eoplly New Energy Tech.*	Eoplly New Energy Tech.	24.48
	Hanwha Solarone (Qidong)*	Hanwha Solarone (Qidong)	24.48
	Himin Clean Energy Holdings*	Himin Clean Energy Holdings	24.48
_	JA Solar Tech. Yangzhou*	JingAo Solar	24.48
	Shanghai JA Solar Tech.*	Shanghai JA Solar Tech.	24.48
	Jetion Solar (China)*	Jetion Solar (China)	24.48
	Jinko Solar Import and Export*	Jinko Solar	24.48
	JinkoSolar International Limited *	Jinko Solar	24.48
	Lightway Green New Energy*	Lightway Green New Energy	24.48
	Sumec Hardware & Tools	Phono Solar Tech.*	24.48
	Risen Energy*	Risen Energy	24.48
	Wuxi Suntech Power*	Wuxi Suntech Power	29.14
	Luoyang Suntech Power*	Luoyang Suntech Power	29.14
	Suntech Power*	Suntech Power	29.14
	Wuxi Sun-shine Power*	Wuxi Sun-shine Power	29.14
	Zhejiang Jiutai New Energy	Zhejiang Topoint Photovoltaic *	24.48

Table 27 – ADD Separate Rates (%)	
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Exporter	Producer	Margin
Changzhou Trina Solar Energy and	Changzhou Trina Solar Energy	18.32
Trina Solar (Changzhou) Science & Tech.*	Trina Solar (Changzhou) Science & Tech.	18.32
	HC Solar Power	24.48
	Zhiheng Solar	24.48
	Zhejiang Leye Photovoltaic Science & Tech.*	24.48
Upsolar Group*	Tianwei New Energy (Chengdu) PV Module	24.48
	Zhejiang ZG-Cells	24.48
	Zhejiang Xinshun Guangfu Science and Tech.	24.48
	Zhejiang Jiutai New Energy	24.48
Wanxiang Import & Export*	Zhejiang Wanxiang Solar	24.48
Baoding Tianwei Yingli New Energy Resources*	Baoding Tianwei Yingli New Energy Resources	24.48
	Yingli Energy (China) Co. Limited	24.48
Yingli Energy (China) Co. Limited*	Yingli Energy (China) Co. Limited	24.48
	Baoding Tianwei Yingli New Energy Resources	24.48
Leye Photovoltaic*	Leye Photovoltaic	24.48
Solarbest Energy-Tech (Zhejiang)*	Solarbest Energy-Tech (Zhejiang)	24.48
Zhejiang Sunflower Light Energy Sci. & Tech. Ltd L. Co.*	Zhejiang Sunflower Light Energy Sci. & Tech. Ltd L. Co.	24.48
ERA Solar	ERA Solar	24.48
Changzhou NESL Solartech	Changzhou NESL Solartech	24.48
Ningbo Qixin Solar Electrical Appliance	Ningbo Qixin Solar Electrical Appliance	24.48
Ningbo Ulica Solar Science & Tech.	Ningbo Ulica Solar Science & Tech.	24.48
Shenzhen Topray Solar	Shenzhen Topray Solar	24.48
Sopray Energy	Sopray Energy	24.48

		,
Exporter	Producer	Margin
Sun Earth Solar Power	Sun Earth Solar Power	29.14
Suzhou Shenglong PV-TECH	Suzhou Shenglong PV-TECH	24.48
Zhejiang Shuqimeng Photovoltaic Tech.	Zhejiang Shuqimeng Photovoltaic Tech.	24.48
Tianwei New Energy (Chengdu) PV Module	Tianwei New Energy (Chengdu) PV Module	24.48
Canadian Solar International Limited	Canadian Solar Manufacturing (Changshu)	24.48
	Canadian Solar Manufacturing (Luoyang)	24.48
Canadian Solar Manufacturing (Changshu)	Canadian Solar Manufacturing (Changshu)	24.48
Canadian Solar Manufacturing (Luoyang)	Canadian Solar Manufacturing (Luoyang)	24.48
LDK Solar Hi-tech (Nanchang)*	LDK Solar Hi-tech (Nanchang)	24.48
LDK Solar Hi-tech (Suzhou)*	LDK Solar Hi-tech (Suzhou)	24.48
Jiawei Solarchina (Shenzhen)	Jiawei Solarchina (Shenzhen)	24.48
CSG PVTech	CSG PVTech	24.48
Delsolar	DelSolar (Wujiang)	24.48
Dongfang Electric (Yixing) MAGI Solar Power Tech.	Dongfang Electric (Yixing) MAGI Solar Power Tech.	24.48
Hangzhou Zhejiang Univ. Sunny Energy Science and Tech.	Hangzhou Zhejiang Univ. Sunny Energy Science and Tech.	24.48
Jiangsu Green Power PV	Jiangsu Green Power PV	24.48
Jiangsu Sunlink PV Tech.	Jiangsu Sunlink PV Tech.	24.48
Konca Solar Cell	Konca Solar Cell	24.48
Motech (Suzhou) Renewable Energy	Motech (Suzhou) Renewable Energy	24.48
Ningbo ETDZ Holdings	Hangzhou Zhejiang Univ. Sunny Energy Science and Tech.	24.48
Ningbo Komaes Solar Tech.	Ningbo Komaes Solar Tech.	24.48
Perlight Solar	Perlight Solar	24.48
Shanghai Solar Energy Science & Tech.	Shanghai Solar Energy Science & Tech.	24.48

2/0	Table $27 - ADD$ Separate Rates (%)	Separate Kates (%)
Exporter	Producer	Margin
tenKsolar (Shanghai)	tenKsolar (Shanghai)	24.48
Yuhuan Sinosola Science & Tech.	Yuhuan Sinosola Science & Tech.	24.48
Yuhuan Solar Energy Source	Yuhuan Solar Energy Source	24.48
PRC-Wide Rate		249.96