

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:

Andritz Inc.
35 Sherman Street
Muncy, PA 17756

Respondent

ORDER RELATING TO
ANDRITZ, INC.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Andritz Inc., of its intention to initiate an administrative proceeding against Andritz Inc. pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ through the issuance of a Proposed Charging Letter to Andritz Inc. that alleges that Andritz Inc. committed 36 violations of the Regulations.² Specifically:

STATEMENT OF CHARGES

Charges 1 - 36 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct

1. As described in the Schedule of Violations, between on or about May 25, 2023, through on or about February 12, 2024, Andritz Inc. engaged in conduct prohibited by the Regulations on 36 occasions when it exported refiner plates, valued at \$3,154,794.36, to Andritz Fiedler. Andritz Fiedler then reexported the refiner plates to Russia. The sales to Russia were conducted without the requisite license or other authorization from BIS.
2. The items reexported by Andritz Fiedler are classified EAR99. However, because these items were classified by Harmonized Tariff Schedule (“HTS”) codes which appeared on Supplement No. 4 to Part 746 of the EAR at the time of export, these items required a license for export to Russia pursuant to § 746.8 of the EAR.³ On

¹ The Regulations are issued under the authority of the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2025). The charged violations occurred in 2023–2024. The Regulations governing the violations at issue are found in the 2023–2024 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2023-2024)). The 2025 Regulations set forth the procedures that apply to this matter.

³ The EAR’s Harmonized Tariff Schedule-based license requirements for items destined to Russia have been continuously revised since first imposed in February 2022. The items in question here appear on

May 23, 2023, BIS added license requirements for the items to limit Russia's access to items that enable its military capabilities and to sources of revenue that could support those capabilities. 88 Fed. Reg. 33422. Refiner plates are used in the refining process of paper pulp making machines. Paper pulp is a basic component of manufacturing paper. While there is no evidence that Andritz Inc.'s refiner plates were designed for, used, or could be used, for military-related purposes, wood and flax pulp could potentially have military application.

3. Supplement No. 4 to Part 746 of the Regulations identifies 'industrial goods' which require a BIS license for export, reexport, or transfer (in-country) to Russia or Belarus. For the purposes of this license requirement, an 'industrial good' is any item identified in Supplement No. 4 to Part 746 of the Regulations. The HTS classifications of the items contained in each of Andritz Inc.'s 36 exports are detailed in the Schedule of Violations below.
4. Upon learning of the transactions, Andritz Inc. took immediate steps to investigate the matter, voluntarily disclosed the transactions in a timely fashion to BIS, and retained outside counsel to investigate. According to information it voluntarily disclosed to BIS, Andritz Inc. exported refiner plates to Andritz Fiedler without the requisite license. Andritz Fiedler then sold and shipped the refiner plates to entities within Russia.⁴
5. In total, from on or about May 25, 2023, through on or about February 12, 2024, Andritz Inc. engaged in 36 transactions involving the reexport of refiner plates. Each of these transactions involved items classified by an HTS code listed in Supplement No. 4 to Part 746 of the EAR and required a license for export to Russia pursuant to § 746.8(a)(5) of the EAR.
6. By engaging in 36 reexports to Russia without the requisite license or other authorization from BIS, Andritz Inc. committed 36 violations of § 764.2(a) of the Regulations.

Schedule of Violations					
Charge No.	Shipment Date	Item(s) Description	HTS/HS Code	Violation Type	Value ⁵
1	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	76,000
2	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	67,550
3	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	48,800
4	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	24,800

Supplement no. 4 to Part 746 of the EAR. The license requirement for these items when destined to or within Russia now appears in § 746.8(a)(5) of the EAR.

⁴ Andritz Inc.'s voluntary self-disclosure reported 41 violations. Here, BIS has chosen not to separately charge the 5 remaining violations because the items either did not originate from the United States or the item was not subject to a license requirement at the time of export.

⁵ The transaction values are provided in Euro.

5	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	53,900
6	May 26, 2023	Refiner Plate	8439.91	§ 764.2(a)	26,052
7	May 30, 2023	Refiner Plate	8439.91	§ 764.2(a)	92,500
8	June 29, 2023	Refiner Plate	8439.91.10	§ 764.2(a)	125,339.10
9	June 29, 2023	Refiner Plate	8439.91.10	§ 764.2(a)	136,842.20
10	July 13, 2023	Refiner Plate	8439.91.10	§ 764.2(a)	6,600
11	July 24, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	26,600
12	August 1, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	160,904
13	August 1, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	205,750
14	August 3, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	139,580
15	August 3, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	237,432
16	September 4, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	39,400
17	October 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	57,200
18	October 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	35,200.80
19	November 2, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	114,600
20	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	17,400
21	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	62,682.40
22	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	85,000
23	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	81,800
24	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	112,000
25	November 15, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	112,000
26	November 15, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	9,900
27	December 13, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	292,280
28	December 13, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	89,312
29	December 14, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	59,810
30	December 19, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	128,750
31	December 19, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	64,240
32	January 25, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	56,000
33	January 25, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	6,100
34	January 25, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	50,000
35	January 30, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	17,180
36	February 12, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	110,960
Total Value of Shipments:			€3,029,864.5 or \$3,154,794.36 ⁶		

⁶ Based upon a conversion rate of 1 Euro to 1.04 dollars calculated on February 5, 2025.

WHEREAS, BIS and Andritz Inc. have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein;

WHEREAS, Andritz Inc. admits committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, I have approved of the terms of such Settlement Agreement;
IT IS THEREFORE ORDERED:

FIRST, Andritz Inc. shall be assessed a civil penalty in the amount of \$1,577,397.18, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of this Order.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2012)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due date specified herein, Andritz Inc. will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the full and timely payment of the civil penalty in accordance with the payment schedule set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Andritz Inc. Accordingly, if Andritz Inc. should fail to pay the civil penalty in a full and timely manner, the undersigned may issue an order denying all of Andritz Inc.'s export privileges under the Regulations for a period of one year from the date of failure to make such payment.

FOURTH, the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.

A handwritten signature in black ink, appearing to read 'John D. Sonderman', is written over a horizontal line.

John D. Sonderman
Performing the Non-Exclusive Functions
and Duties of the Assistant Secretary of
Commerce for Export Enforcement

Issued this 29 day of July, 2025.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:

Andritz Inc.
35 Sherman Street
Muncy, PA 17756

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Andritz Inc. of Muncy, Pennsylvania and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”).¹

WHEREAS, Andritz Inc. filed a voluntary self-disclosure with BIS’s Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein and has made investment in and improvement of its existing compliance program;

WHEREAS, BIS has notified Andritz Inc. of its intention to initiate an administrative proceeding against Andritz Inc., pursuant to the Regulations;²

WHEREAS, BIS has issued a Proposed Charging Letter to Andritz Inc. that alleges that Andritz Inc. committed 36 violations of the Regulations, specifically:

STATEMENT OF CHARGES

Charges 1 – 36 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct

¹ The Regulations issued under the authority of the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”).

² The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2025). The charged violations occurred in 2023 through 2024. The Regulations governing the violations at issue are found in the 2023 through 2024 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2023 - 2024)). The 2025 Regulations set forth the procedures that apply to this matter.

1. As described in the attached Schedule of Violations, between on or about May 25, 2023, through on or about February 12, 2024, Andritz Inc. engaged in conduct prohibited by the Regulations on 36 occasions when it exported refiner plates, valued at \$3,154,794.36, to Andritz Fiedler. Andritz Fiedler then reexported the refiner plates to Russia. The sales to Russia were conducted without the requisite license or other authorization from BIS.
2. The items reexported by Andritz Fiedler are classified EAR99. However, because these items were classified by Harmonized Tariff Schedule (“HTS”) codes which appeared on Supplement No. 4 to Part 746 of the EAR at the time of export, these items required a license for export to Russia pursuant to § 746.8 of the EAR.³ On May 23, 2023, BIS added license requirements for the items to limit Russia’s access to items that enable its military capabilities and to sources of revenue that could support those capabilities. 88 Fed. Reg. 33422. Refiner plates are used in the refining process of paper pulp making machines. Paper pulp is a basic component of manufacturing paper. While there is no evidence that Andritz Inc.’s refiner plates were designed for, used, or could be used, for military-related purposes, wood and flax pulp could potentially have military application.
3. Supplement No. 4 to Part 746 of the Regulations identifies ‘industrial goods’ which require a BIS license for export, reexport, or transfer (in-country) to Russia or Belarus. For the purposes of this license requirement, an ‘industrial good’ is any item identified in Supplement No. 4 to Part 746 of the Regulations. The HTS classifications of the items contained in each of Andritz Inc.’s 36 exports are detailed in the Schedule of Violations below.
4. Upon learning of the transactions, Andritz Inc. took immediate steps to investigate the matter, voluntarily disclosed the transactions in a timely fashion to BIS, and retained outside counsel to investigate. According to information it voluntarily disclosed to BIS, Andritz Inc. exported refiner plates to Andritz Fiedler without the requisite license. Andritz Fiedler then sold and shipped the refiner plates to entities within Russia.⁴
5. In total, from on or about May 25, 2023, through on or about February 12, 2024, Andritz Inc. engaged in 36 transactions involving the reexport of refiner plates. Each of these transactions involved items classified by an HTS code listed in Supplement No. 4 to Part 746 of the EAR and required a license for export to Russia pursuant to § 746.8(a)(5) of the EAR.

³ The EAR’s Harmonized Tariff Schedule-based license requirements for items destined to Russia have been continuously revised since first imposed in February 2022. The items in question here appear on Supplement no. 4 to Part 746 of the EAR. The license requirement for these items when destined to or within Russia now appears in § 746.8(a)(5) of the EAR.

⁴ Andritz Inc.’s voluntary self-disclosure reported 41 violations. Here, BIS has chosen not to separately charge the 5 remaining violations because the items either did not originate from the United States or the item was not subject to a license requirement at the time of export.

6. By engaging in 36 reexports to Russia without the requisite license or other authorization from BIS, Andritz Inc. committed 36 violations of § 764.2(a) of the Regulations.

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⁵ The transaction values are provided in Euro.

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36	February 12, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	110,960
Total Value of Shipments:			€3,029,864.5 or \$3,154,794.36 ⁶		

WHEREAS, Andritz Inc. has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions that could be imposed against it if the allegations are found to be true;

WHEREAS, Andritz Inc. fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, Andritz Inc. enters into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

WHEREAS, Andritz Inc. states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, Andritz Inc. admits committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, Andritz Inc. agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over Andritz Inc., under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanctions shall be imposed against Andritz Inc.:

⁶ Based on a conversion rate of 1 Euro to 1.04 dollars calculated on February 5, 2025.

a. Andritz Inc. shall be assessed a civil penalty in the amount of \$1,577,397.18, the payment of which shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions.

b. The full and timely payment of the civil penalty agreed to in Paragraph 2.a, above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Andritz Inc. Failure to make full and timely payment of the civil penalty may result in the denial of all of Andritz Inc.'s export privileges under the Regulations for one year from the date of the failure to make such payment.

3. Subject to the approval of this Agreement pursuant to Paragraph 7 hereof, Andritz Inc. hereby waives all rights to further procedural steps in this matter, including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Andritz Inc. also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order, until Andritz Inc. pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement.

4. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a above, BIS will not initiate any further administrative proceeding against Andritz Inc. in connection with any violation of the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

6. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

7. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement, or appropriate designee, approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

8. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

9. Each signatory affirms that he/she has authority to enter into this Settlement Agreement and to bind his/her respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE

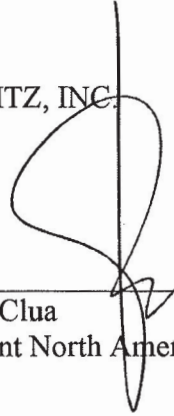
DAN CLUTCH

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Dan Clutch
Acting Director of Export Enforcement

Date: 7/29/2025

ANDRITZ, INC.



Robert Clua
President North America, Andritz Inc.

Date: 7-23-2025

Reviewed and approved by:



David Lim, Esq.
White & Case LLP
Counsel for Andritz, Inc.

Date: July 23, 2025



Gunjan R. Talati, Esq.
Kilpatrick Townsend & Stockton LLP
Counsel for Andritz, Inc.

Date: 7/23/25

PROPOSED CHARGING LETTER

Andritz Inc
35 Sherman Street
Muncy, PA, 17756

Attention: Gunjan Talati, Kilpatrick, Townsend & Stockton, LLP
David Lim, White & Case, LLP

Dear Mr. Talati and Mr. Lim,

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Andritz Inc. committed 36 violations of the Export Administration Regulations (the “Regulations” or “EAR”).¹ Specifically, BIS alleges and charges the following:

GENERAL ALLEGATIONS

As described further below, between on or about May 25, 2023, through on or about February 12, 2024, Andritz Inc. violated the Regulations when it exported items subject to the EAR to Andritz Fiedler GmbH (“Andritz Fiedler”), who then reexported the items to Russia, without the requisite license or other authorization from BIS. Specifically, Andritz Inc. exported 36 shipments of refiner plates to Andritz Fiedler, all of which are designated EAR99 but which required a license for export to Russia under § 746.8(a)(5) of the Regulations.² Andritz Fiedler then sold and shipped the refiner plates to entities within Russia.

Key Parties

A. Andritz Inc.

Andritz Inc. is a wholly owned U.S. subsidiary of Andritz AG, a publicly traded company based in Austria. Andritz Inc. manufactures, among other things, refiner plates, which are used in the refining process of paper pulp-making machines. The EAR99 refiner plates are manufactured at Andritz Inc.’s facility in Muncy, Pennsylvania for export outside of the United States.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2025). The charged violations occurred in 2023 through 2024. The Regulations governing the violations at issue are found in the 2023 through 2024 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2022 - 2023)). The 2024 Regulations set forth the procedures that apply to this matter.

² The EAR’s Harmonized Tariff Schedule-based license requirements for items destined to Russia have been continuously revised since first imposed in February 2022. The items in question here appear on Supplement no. 4 to Part 746 of the EAR. The license requirement for these items when destined to or within Russia now appears in § 746.8(a)(5) of the EAR.

B. Transaction Parties

Andritz Fiedler GmbH (“Andritz Fiedler”) is a company located in Germany and is a member of the Andritz Group. Andritz Fiedler fulfils European companies’ orders for the refiner plates that Andritz Inc. manufactures in the United States.

STATEMENT OF CHARGES

Charges 1-36 15 C.F.R. § 764.2(a) – Engaging in prohibited conduct

1. As described in the attached Schedule of Violations, between on or about May 25, 2023, through on or about February 12, 2024, Andritz Inc. engaged in conduct prohibited by the Regulations on 36 occasions when it exported refiner plates, valued at \$3,154,794.36, to Andritz Fiedler. Andritz Fiedler then reexported the refiner plates to Russia. The sales to Russia were conducted without the requisite license or other authorization from BIS.
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6. By engaging in 36 reexports to Russia without the requisite license or other authorization from BIS, Andritz Inc. committed 36 violations of § 764.2(a) of the Regulations.

* * * * *

Accordingly, Andritz is hereby notified that an administrative proceeding is instituted against it pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$374,474 per violation,⁴ or twice the value of the transaction that is the basis of the violation;⁵
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Andritz Inc. fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6 and 766.7. If Andritz Inc. defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Andritz Inc. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Andritz Inc. is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. Andritz Inc. is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent them. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Andritz Inc. have a proposal to settle this case, Andritz Inc. should transmit it to the attorney representing BIS named below.

⁴ See 15 C.F.R. § 6.3(c)(6). This amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74, enacted on November 2, 2015. *See* 89 Fed. Reg. 106308 (Dec. 30, 2024) (adjusting for inflation the maximum civil monetary penalty under ECRA from \$364,992 to \$374,474, effective January 15, 2025).

⁵ See Export Control Reform Act of 2018, 50 U.S.C. § 4819(c)(1)(A) (2019).

Andritz Inc. is further notified that under the Small Business Regulatory Enforcement Flexibility Act, Andritz Inc. may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Andritz Inc.'s answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of Andritz Inc.'s answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: Tristan de Vega, Esq.
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Tristan de Vega is the attorney representing BIS in this case; any communications that Andritz Inc. may wish to have concerning this matter should occur through him. Mr. de Vega may be contacted by email at tdevega@doc.gov.

Sincerely,

Dan Clutch
Acting Director
Office of Export Enforcement

Schedule of Violations					
Charge No.	Shipment Date	Item(s) Description	HTS/HS Code	Violation Type	Value ⁶
1	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	76,000
2	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	67,550
3	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	48,800
4	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	24,800
5	May 25, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	53,900
6	May 26, 2023	Refiner Plate	8439.91	§ 764.2(a)	26,052
7	May 30, 2023	Refiner Plate	8439.91	§ 764.2(a)	92,500
8	June 29, 2023	Refiner Plate	8439.91.10	§ 764.2(a)	125,339.10
9	June 29, 2023	Refiner Plate	8439.91.10	§ 764.2(a)	136,842.20
10	July 13, 2023	Refiner Plate	8439.91.10	§ 764.2(a)	6,600
11	July 24, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	26,600
12	August 1, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	160,904
13	August 1, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	205,750
14	August 3, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	139,580
15	August 3, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	237,432
16	September 4, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	39,400
17	October 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	57,200
18	October 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	35,200.80
19	November 2, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	114,600
20	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	17,400
21	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	62,682.40
22	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	85,000
23	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	81,800
24	November 6, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	112,000
25	November 15, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	112,000
26	November 15, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	9,900
27	December 13, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	292,280
28	December 13, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	89,312
29	December 14, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	59,810
30	December 19, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	128,750

⁶ The transaction values are provided in Euro.

31	December 19, 2023	Refiner Plate	8439.91.00	§ 764.2(a)	64,240
32	January 25, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	56,000
33	January 25, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	6,100
34	January 25, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	50,000
35	January 30, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	17,180
36	February 12, 2024	Refiner Plate	8439.91.00	§ 764.2(a)	110,960
Total Value of Shipments:			€3,029,864.5 or \$3,154,794.36 ⁷		

⁷ Based upon a conversion rate of 1 Euro to 1.04 dollars calculated on February 5, 2025.