PETITION TO THE U.S. DEPARTMENT OF COMMERCE TO INVESTIGATE AND RECOMMEND A BAN TO THE PRESIDENT ON THE IMPORTS OF OIL, GAS, COAL, PETROLEUM AND HYDROCARBON PRODUCTS FROM THE RUSSIAN FEDERATION PURSUANT TO SECTION 232 OF THE U.S. TRADE ACT

I. Executive Summary and Introduction

The barbaric and unlawful attack by the Russian Federation upon Ukraine, which is being financed by the purchase of Russian oil and other fossil fuels, is a severe national security threat to the United States, its residents, and its allies. This petition seeks, through the relevant legal processes herein described, to stop the import of all oil, gas, coal, petroleum and hydrocarbon products from the Russian Federation in order to protect U.S. national security.[1]

The U.S. Trade Act, as amended, requires the Secretary of Commerce to "initiate an appropriate investigation to determine the effects on the national security of imports" of crude and refined oil and other fossil fuels "upon application of an interested party." 19 U.S.C. § 1862(b)(1)(A). The Trade Act provides the legal authority for the President and Department of Commerce to initiate, and complete, all necessary administrative actions to effectuate meaningful trade restrictions on the import of oil, gas, coal, petroleum and hydrocarbon products from the Russian Federation.

Oil and related fossil fuel exports represent sixty percent of Russia's exports and forty percent of Russia's overall economy.[2] The United States imports a variety of fossil fuels from Russia, including crude oil, which represents less than five percent of the U.S. total, and gasoline, which represents about twenty percent of the U.S. total.[3] Significantly, Russia is using these funds to finance the illegal war against Ukraine, threatening U.S. national security.

Fossil fuels imports further threaten U.S. national security by driving the climate emergency. The U.S. Department of Defense, among others, has repeatedly warned of the national security threat from climate change. Fossil fuel imports directly contribute to this national security threat.

The horrors the world is witnessing in Ukraine should be a clarion call to end our global dependence on fossil fuels and the petrostates they prop up. The recent United Nations resolution condemning the Russian attack, as well as the most recent Intergovernmental Panel on

---

[1] The U.S. does not export appreciable amounts of any fossil fuels to the Russian Federation. As the Attachment to this petition demonstrates, the U.S. imports significant amounts of oil, various petroleum products, and coal from the Russian Federation. *See, e.g.*, U.S. Trade Representative (2022), https://ustr.gov/countries-regions/europe-middle-east/russia-and-eurasia/russia

[2] Jamie Henn, Fossil fuel companies are trying to exploit this war for their gain, The Guardian (Feb. 26, 2022). https://www.theguardian.com/commentisfree/2022/feb/26/big-oil-ukraine-russia-putin *See also* U.S. Energy Information Administration, US Imports from Russia of Crude Oil and Petroleum Products (Feb. 28, 2022). https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=MTTIM_NUS-NRS_1&f=M

[3] Ken Roberts, Percent of U.S. Oil Imports from Russia Highest in Decades, *Forbes* (March 5, 2022). https://www.forbes.com/sites/kenroberts/2022/03/05/percent-of-us-oil-imports-from-russia-highest-in-decades---at-35/?sh=4721ff88aae8 *See also* U.S. Energy Information Administration, Russia exports most of its crude oil products mainly to Europe *(Nov.* 14, 2017). https://www.eia.gov/todayinenergy/detail.php?id=33732

Climate Change (IPCC) report on the severity of the climate crisis, together compel the Biden administration to use all its powers to end fossil fuel trade with nations that cause human rights violations, global warming, and injuries to countless citizens and consumers in the United States and beyond.

Specifically, Petitioners seek and request the following:

- That the Secretary of Commerce, in consultation with the Secretary of Defense, immediately initiate an appropriate investigation to determine the effects on the national security of imports of oil, gas, coal, petroleum and hydrocarbon products from the Russian Federation, and submit a report to the President to that effect within 270 days after the investigation is started.
- That the Secretary of Commerce find that oil, gas, coal, petroleum and hydrocarbon product imports from the Russian Federation are threatening the national security of the United States, and strongly recommend a ban on such products to the President.

The petitioner is the Center for Biological Diversity ("Center"), and its 1.7 million members, activists, and supporters in all fifty states and the District of Columbia. The Center is a non-profit organization dedicated to protecting native plants and animals and their habitats. The Center possesses many programs including one pertaining to sustainability and consumption.

II. The U.S. Trade Act, as Amended

Section 232 of the U.S. Trade Act, as amended, states:

> "Upon request of the head of any department or agency, upon application of an interested party, or upon his own motion, the Secretary of Commerce (hereafter in this section referred to as the "Secretary") shall immediately initiate an appropriate investigation to determine the effects on the national security of imports of the article which is the subject of such request, application, or motion.[4]

The Center for Biological Diversity and its members and supporters are interested parties seeking an investigation to determine the effects on national security caused by the effects oil, gas, coal, petroleum and hydrocarbon product consumption have on climate change, which is the ultimate threat to our Nation's security, domestically and abroad. Specifically, petitioner seeks recognition and remedy to the double threat that Russian fossil fuel imports into the U.S. represent: fossil fuel import and consumption threaten national security by exacerbating global warming, and purchasing Russian fossil fuels directly funds an illegal war against Ukraine.

After initiating an investigation, the Secretary of Commerce must inform the Secretary of Defense of the investigation. The Secretary of Commerce must work with the Secretary of Defense on methodological and policy questions resulting from the investigation, seek information and advice from other agency heads and leaders, and potentially hold public hearings. Within 270 days after initiating the investigation, the Secretary of Commerce must

[4] 19 U.S.C. § 1862(b)(1)(A).

provide a report to the President, with a determination as to whether the subject articles impinge on the national security and any recommendations as to actions necessary to protect the national security.

Congress did not define "national security" in Section 232.[5,6] "National security" includes but is absolutely not limited to national defense.[7] National defense includes both direct defense of the United States, and the United States' ability to project military power globally.[8] By the Department of Defense's own words, global warming and associated climate change are severely impacting the United States military's defensive abilities both within the United States and abroad.[9] In addition, the intelligence community has also written extensively on climate change and global warming as a worldwide threat.[10]

National security is also inextricably tied to economic security, and its many permutations including social displacement, disasters, strains on infrastructure, and rising health care costs. Section 232's implementing regulations recognize this.[11] Imports of Russian fossil fuels threaten national security because the proceeds from the sales are being used to finance Russia's war on the Ukraine. In addition, the import of Russian fossil fuels further threaten national security through their contribution to climate change. The articles within the product scope of this Petition are so damaging to the environment and contribute so greatly to global warming, that they are severely undermining the national security both domestically and abroad.

III. Fossil Fuel Imports from Russia Threaten National Security because the Proceeds are Funding Russia's war against Ukraine

As already explained, the United States imports a sizeable amount of fossil fuels from the Russian Federation, and the proceeds from the purchase of these fossil fuels are funding the war

---

[5] Publication of a Report on the Effect of Imports of Steel on the National Security: An Investigation Conducted Under Section 232 of the Trade Expansion Act of 1962, as Amended, 85 Fed. Reg. 40,202, 40,206–07 (July 6, 2020).

[6] According to the Department and its agencies, the two traditional ways of thinking about when imports threaten national security is to determine either (1) whether "the United States is excessively dependent on imports from unreliable or unsafe sources, and thereby is vulnerable to a supply disruption" or (2) whether imports "fundamentally threaten the viability of U.S. industries and resources needed to produce domestically goods and services necessary to ensure U.S. national security." BUREAU OF EXPORT ADMINISTRATION, DEP'T OF COMMERCE, THE EFFECT OF IMPORTS OF IRON ORE AND SEMI-FINISHED STEEL ON THE NATIONAL SECURITY 1, 13-20 (2001) [hereinafter 2001 Report]. Here, the fact that the U.S. purchase of Russian oil is literally funding the illegal war in Ukraine and fueling the climate crisis implicates both of these factors.

[7] *See* 19 U.S.C. § 1862(d); 85 Fed. Reg. at 40,207.

[8] BUREAU OF EXPORT ADMINISTRATION, DEP'T OF COMMERCE, 2001 REPORT, AT 5.

[9] *See generally*, OFFICE OF THE UNDER SEC'Y OF DEF. FOR ACQUISITION & SUSTAINMENT, DEP'T OF DEF., REPORT ON EFFECTS OF A CHANGING CLIMATE TO THE DEPARTMENT OF DEFENSE (2019).

[10] *See, e.g.*, DIRECTOR OF NATIONAL INTELLIGENCE, WORLD-WIDE THREAT ASSESSMENT OF THE US INTELLIGENCE COMMUNITY 21–23 (2019).

[11] *See* 15 C.F.R. § 705.4(a), (b). Among the several factors the agency must consider include the "displacement of any domestic products causing substantial unemployment, decrease in the revenues of government, loss of investment or specialized skills and productive capacity, or other serious effects; and any other relevant factors that are causing or will cause a weakening of our national economy."

against Ukraine and other illegal Russian behavior and threatening U.S. national security. The United States must not support the Russian regime with actions that harm both our country and the rest of the world. The United States must immediately stop these fossil fuel imports from Russia as part of an overall strategy to address Russian aggression and the climate crisis.[12]

Funded significantly by the U.S. purchase of Russian fossil fuels, Russia's invasion of Ukraine also possesses immediate consequences for human rights and human lives. These impacts will be magnified by the war's potentially catastrophic environmental impacts, which themselves pose both immediate and long-term threats to human rights, health, welfare, and livelihoods.

Russia's attack on and seizure of the Zaporizhzhia nuclear plant presents profound threats to the world. Further, the intentional takeover and occupation of the Chernobyl nuclear disaster site creates profound and potentially long-term risks to the people of Ukraine. Already, Russian military operations at the Chernobyl site have mobilized radioactive dust and increased detectable radiation, raising serious concerns that Russian troops and equipment may spread radioactive material into new areas. More troublingly, the Russian seizure of a nuclear containment facility that has no military objective should be a matter of profound concern to all nations.

Nor is Chernobyl the only nuclear site at risk. The International Atomic Energy Agency reported missile strikes near two separate radioactive waste disposal facilities. Military operations in a country with fifteen active nuclear reactors pose unprecedented risks, which could jeopardize the environment and public health of Ukraine for years.

Finally, the Russian invasion of Ukraine and the economic weaponization of Russia's oil and gas resources against those nations who would come to Ukraine's aid is a stark reminder of the recurring intersections between fossil fuel resources and violent conflict. As the Intergovernmental Panel on Climate Change released its latest stark warnings about humanity's dwindling window of opportunity to avert truly catastrophic and irreversible climate chaos, Russia's invasion of Ukraine is a grim reminder of the vital importance and urgent necessity of ending the world's reliance on fossil fuels. As it relates to this petition, the U.S. must not purchase climate harming fossil fuels from Russia, which then uses these funds to wage illegal war that threatens U.S. national security.

IV. Fossil Fuel Imports from Russia Threaten National Security by Fueling the Climate Emergency

Fossil fuels are driving a global climate emergency that presents a "code red for humanity."[13] The extraction and burning of fossil fuels are responsible for the vast majority—86 percent—of

[12] *See*, U.S. Department of Defense, *supra*, note 9 and, *infra*, note 25. The U.S. possesses the capacity today to shift significant parts of its economy to clean renewable energy. *See, e.g.*, Mark Jacobson, 100% Clean, Renewable Energy and Storage for Everything https://web.stanford.edu/group/efmh/jacobson/WWSBook/WWSBook.html (last visited March 2, 2022).

[13] United Nations Secretary-General, *Secretary-General's statement on the IPCC Working Group 1 Report on the Physical Science Basis of the Sixth Assessment*, Aug. 9, 2021, https://www.un.org/sg/en/content/secretary-generals-statement-the-ipcc-working-group-1-report-the-physical-science-basis-of-the-sixth-assessment.

all human-caused carbon dioxide emissions globally.[14] As UN Secretary-General António Guterres powerfully stated upon the release of the IPCC's latest 2022 report, "coal and other fossil fuels are choking humanity" and the report is "atlas of human suffering and a damning indictment of failed climate leadership."[15] The extreme heat waves, hurricanes and wildfires wreaking destruction across the United States, the deadly floods in Europe and Asia, record-breaking droughts across Africa and South America, and devastating fires in Australia and the Amazon rainforest over just the past two years provide unequivocal proof that time has already run out. The climate emergency is here, and it is killing people, intensifying food insecurity, driving political unrest, causing ecosystem collapse, and creating escalating suffering across the nation and around the world.[16] The climate crisis also furthers glaring injustice, with Black, Latino, Indigenous, Asian American and Pacific Islanders, and other communities of color and low-wealth communities experiencing the gravest impacts.[17] The vast scientific literature documenting these findings has been set forth in a series of authoritative reports from the Intergovernmental Panel on Climate Change (IPCC), U.S. Global Change Research Program, and other institutions, which make clear that fossil-fuel driven climate change is an existential "threat to human well-being and planetary health"[18] and that every increase in fossil fuel pollution pushes us further toward a dangerous and increasingly unlivable planet.[19]

Fossil fuel production, use, import and export must fall to zero as quickly as possible to avoid catastrophic damages from the climate crisis in the U.S. and around the world. An overwhelming scientific consensus makes clear that limiting global temperature rise to the Paris Agreement's 1.5°C climate limit requires governments to immediately halt approval of new fossil fuel production and infrastructure and rapidly phase out existing fossil fuel production and

---

[14] Intergovernmental Panel on Climate Change, Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (2021) at 5-19, https://www.ipcc.ch/report/sixth-assessment-report-working-group-i.

[15] United Nations Secretary-General, *António Guterres (UN Secretary-General) to the press conference launch of IPCC report* (February 28, 2022), https://media.un.org/en/asset/k1x/k1xcijxjhp.

[16] Intergovernmental Panel on Climate Change, Climate Change 2022, Impacts, Adaptation and Vulnerability (2022), https://www.ipcc.ch/report/ar6/wg2/; NOAA, National Centers for Environmental Information, Billion-Dollar Weather and Climate Disasters, https://www.ncdc.noaa.gov/billions/ (reporting that in 2021 alone in the U.S. , there were 20 weather and climate disaster events with losses exceeding $1 billion each and 688 deaths).

[17] Donaghy, Tim & Charlie Jiang for Greenpeace, Gulf Coast Center for Law & Policy, Red, Black & Green Movement, and Movement for Black Lives, Fossil Fuel Racism: How Phasing Out Oil, Gas, and Coal Can Protect Communities (2021), https://www.greenpeace.org/usa/wp-content/uploads/2021/04/Fossil-Fuel-Racism.pdf; U.S. Environmental Protection Agency, Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts, EPA 430-R-21-003 (2021), www.epa.gov/cira/social-vulnerability-report.

[18] Intergovernmental Panel on Climate Change, Climate Change 2022, Impacts, Adaptation and Vulnerability (2022) at SPM-35, https://www.ipcc.ch/report/ar6/wg2/.

[19] U.S. Global Change Research Program, Climate Science Special Report: Fourth National Climate Assessment, Vol. I (2017), https://science2017.globalchange.gov/; U.S. Global Change Research Program, Impacts, Risks, and Adaptation in the United States, Fourth National Climate Assessment, Vol. II (2018), https://nca2018.globalchange.gov/; Intergovernmental Panel on Climate Change, Summary for Policymakers. In: Global Warming of 1.5°C, Masson-Delmotte, V. et al. (eds.) (2018), https://www.ipcc.ch/sr15/; Intergovernmental Panel on Climate Change, Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (2021), https://www.ipcc.ch/report/sixth-assessment-report-working-group-i; Intergovernmental Panel on Climate Change, Climate Change 2022, Impacts, Adaptation and Vulnerability (2022), https://www.ipcc.ch/report/ar6/wg2/.

infrastructure in developed fields and mines.[20] The fossil fuels already in development globally contain enough carbon to exceed the 1.5°C limit, meaning that extraction in existing fields and mines must be shut down before their reserves are fully depleted.[21] Yet, as detailed in the landmark United Nations Production Gap Reports, fossil fuel producers are planning to extract more than double the amount of oil, gas and coal by 2030 than is consistent with limiting warming to 1.5°C.[22] In order to keep within the 1.5°C limit**,** the world's fossil fuel production must instead *decrease* by roughly 6% per year between 2020 and 2030.[23] The United States has a moral responsibility to lead the world in a rapid managed decline of fossil fuel production and use—including an end to fossil fuel imports and exports—based on its role as the historic, dominant driver of the climate crisis, its capacity for a just transition to clean energy, and the President's existing executive authority to accomplish this necessary fossil fuel phase-out.[24]

The climate emergency poses significant national and global security risks to the country and the planet that have long been documented. In a recent series of reports, the White House, Pentagon, and intelligence agencies have expressed deep concern that the shifts unleashed by

---

[20] Intergovernmental Panel on Climate Change, Summary for Policymakers. In: Global Warming of 1.5°C, Masson-Delmotte, V. et al. (eds.) (2018), https://www.ipcc.ch/sr15/; Oil Change International, Drilling Toward Disaster: Why U.S. Oil and Gas Expansion Is Incompatible with Climate Limits (2019), http://priceofoil.org/drilling-towards-disaster; Tong, Dan et al., Committed emissions from existing energy infrastructure jeopardize 1.5°C climate target, 572 Nature 373 (2019), https://www.nature.com/articles/s41586-019-1364-3; SEI, IISD, ODI, E3G, and UNEP, The Production Gap: The discrepancy between countries' planned fossil fuel production and global production levels consistent with limiting warming to 1.5°C or 2°C (2020), http://productiongap.org/; Teske, Sven & Sarah Niklas, Fossil Fuel Exit Strategy: An orderly wind down of coal, oil and gas to meet the Paris Agreement (June 2021), https://fossilfueltreaty.org/exit-strategy; Welsby, Dan et al., Unextractable fossil fuels in a 1.5 °C world, 597 Nature 230 (2021), https://doi.org/10.1038/s41586-021-03821-8.

[21] Oil Change International, Drilling Toward Disaster: Why U.S. Oil and Gas Expansion Is Incompatible with Climate Limits (2019), http://priceofoil.org/drilling-towards-disaster.

[22] SEI, IISD, ODI, E3G, and UNEP, The Production Gap: The discrepancy between countries' planned fossil fuel production and global production levels consistent with limiting warming to 1.5°C or 2°C (2020), http://productiongap.org/; SEI, IISD, ODI, E3G, and UNEP, The Production Gap Report 2021 (2021), http://productiongap.org/2021report.

[23] *Id.*

[24] Center for Biological Diversity et al., Petition for a Moratorium on the Leasing of Federal Fossil Fuels on Public Lands (July 2016), https://www.biologicaldiversity.org/campaigns/keep_it_in_the_ground/pdfs/Petition_for_a_Moratorium_on_the_Leasing_of_Federal_Public_Land_Fossil_Fuels.pdf; Center for Biological Diversity et al., Petition to End Federal Offshore Oil and Gas Leasing of the United States Outer Continental Shelf to Address Climate Change (March 29 2016), https://www.biologicaldiversity.org/campaigns/offshore_oil_drilling/pdfs/Petition_to_End_Offshore_Leasing_Center_3-28-16.pdf; Muttitt, Greg & Sivan Kartha, Equity, climate justice and fossil fuel extraction: principles for a managed phase out, 20 Climate Policy 1024 (2020), https://www.tandfonline.com/doi/abs/10.1080/14693062.2020.1763900?journalCode=tcpo20; Center for Biological Diversity et al., Petition to Halt the Approval of Fossil Fuel Infrastructure Permits as Contrary to the Public Interest and For Associated Actions and Rulemaking (October 6, 2021), https://www.biologicaldiversity.org/programs/climate_law_institute/energy_and_global_warming/pdfs/Petition-to-Halt-Army-Corps-Re-Fossil-Fuel-Infrastructure-Permits.pdf; Center for Biological Diversity et al., Petition to Reduce the Rate of Oil and Gas Production on Public Lands and Waters to Near Zero by 2035 (January 19, 2022), https://biologicaldiversity.org/programs/public_lands/energy/dirty_energy_development/pdfs/Petition-to-Phase-Down-Fossil-Fuel-Production-on-Public-Lands-and-Water-19-Jan-2022.pdf; Center for Biological Diversity, The Climate President's Emergency Powers (February 2022), https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Climate-Emergency-Powers-Report.pdf.

climate change can reshape U.S. strategic interests and threaten its geopolitical position.[25] The Department of Defense has concluded that climate change threatens "national security and defense" because it is "reshaping the geostrategic, operational, and tactical environments for the United States and is "exacerbating existing risks and creating new security challenges for U.S. interests.[26] In a 2021 report, the White House acknowledged the intimate relationship among climate change, migration and conflict.[27] Extreme weather events have been leading to climate migration and political unrest in at-risk countries which is expected to increase.[28] The Office of the Director of National Intelligence forecasted that climate change could spawn social upheaval and threaten political stability due to global famine.[29] These reports echo longstanding concerns from the intelligence and defense communities that called for action to reduce greenhouse gas emissions and in some cases have adopted renewable energy solutions.[30] The Army notes that climate change poses "an increased risk of armed conflict in places where established social orders and populations are disrupted."[31] The risk will rise even more where climate effects compound social instability, reduce access to basic necessities, undermine fragile governments and economies, damage vital infrastructure, and lower agricultural production."[32]

At the start of his presidency, Biden issued Executive Order 14008 that stated: "[i]t is the policy of my Administration that climate considerations shall be an essential element of United States foreign policy and national security."[33] Section 103 directs "[a]gencies that engage in extensive international work [to] develop . . . strategies and implementation plans integrating climate considerations into their international work."[34] It also directs DoD, Commerce, CEQ, EPA, the DNI, NASA, and other government agencies to make a joint risk analysis of climate

---

[25] U.S. Dep't of Defense, Office of the Undersecretary for Policy (Strategy, Plans, and Capabilities), *Department of Defense Climate Risk Analysis, Report Submitted to National Security Council* (2021), https://media.defense.gov/2021/Oct/21/2002877353/-1/-1/0/DOD-CLIMATE-RISK-ANALYSIS-FINAL.PDF; U.S. Dep't of the Army, Office of the Assistant Secretary of the Army for Installations, Energy and Environment, *United States Army Climate Strategy* (2022), https://www.army.mil/e2/downloads/rv7/about/2022_army_climate_strategy.pdf; White House, *Report on the Impact of Climate Change on Migration* (2021), https://www.whitehouse.gov/wp-content/uploads/2021/10/Report-on-the-Impact-of-Climate-Change-on-Migration.pdf. *See also* Christopher Flavelle et al., *Climate Change Poses a Widening Threat to National Security*, N.Y. Times, updated Oct. 24, 2021, https://www.nytimes.com/2021/10/21/climate/climate-change-national-security.html.

[26] U.S. Department of Defense, *supra*, note 25.

[27] White House, *supra* note 25.

[28] *Id.*; Shane Harris & Michael Birnbaum, *White House, Intelligence Agencies, Pentagon Issue Reports Warning Climate Change Threatens Global Security*, Wash. Post, Oct., 21, 2021, https://www.washingtonpost.com/national-security/intelligence-pentagon-climate-change-warnings/2021/10/21/ea3a2c84-31d3-11ec-a1e5-07223c50280a_story.html; Nat'l Intelligence Council, *Global Trends 2040: A More Contested World* (2021), https://www.dni.gov/files/ODNI/documents/assessments/GlobalTrends_2040.pdf.

[29] *Id.*

[30] Michael T. Clare, *All Hell Breaking Loose: The Pentagon's Perspective on Climate Change* (2020).

[31] In its first climate strategy report recently released in 2022, the U.S. military set the goals of using 100% pollution-free electricity on Army installations by 2030. U.S. Dep't of the Army, *supra* note 25.

[32] *Id.* at 4-5.

[33] Exec. Order No. 14,008, 86 Fed. Reg. 7619.

[34] *Id.* at 7621.

change to incorporate into the United States' "modeling, simulation, war-gaming, and other analyses."[35]

Fossil fuel extraction is unreliable and unsafe for reasons in addition to its contribution to the climate emergency. Extraction of fossil fuels, particularly in developing countries, is correlated with authoritarianism, volatile economies, a propensity for violent conflict, and social inequality in what is known as the resource curse.[36] In the private sector, fossil fuel and related companies have violated the Foreign Corrupt Practices Act more times than any other industry, including weapons traders.[37] According to Transparency International, the fossil fuel industry is the fourth most corrupt industry in the world.[38] Additionally, some of the largest exporters of crude oil products, like Saudi Arabia and Russia, have abysmal human rights records.[39] The effects of coercive economic practices, by these bad actors and others like them, have already been seen in the U.S. as early as the 1970's.[40] These effects are exacerbated by increased U.S. dependence on crude oil, and only further compounded by the rise of ransomware, as shown by the recent Colonial pipeline crisis.[41]

Fossil fuels are dangerous and unsafe due to the environmental damage from massive catastrophes such as the Deepwater Horizon and Exxon Valdez oil spills, not to mention the countless "smaller" spills that occur almost every day. The Deepwater Horizon oil gusher, for example, led to stark changes in environmental and energy policy regarding offshore oil drilling, motivated by the lackluster ability of BP to contain the spill until some three months later.[42] As

---

[35] *Id.*
[36] CARL OLSON & FRANK LENZMANN, THE SOCIAL AND ECONOMIC CONSEQUENCES OF THE FOSSIL FUEL SUPPLY CHAIN, 3 MRS ENERGY & SUSTAINABILITY 10 (2016).
[37] *Id.* at 12 (citing Guy Chazan, "The Secret World of Oil," by Ken Silverstein (June 1, 2014), https://www.ft.com/content/245fa82c-e0d2-11e3-875f-00144feabdc0).
[38] *Id.*
[39] *See* U.S. DEPT. OF STATE, BUREAU OF DEMOCRACY, HUMAN RIGHTS, AND LABOR, 2020 COUNTRY REPORTS ON HUMAN RIGHTS PRACTICES: SAUDI ARABIA (March 30, 2021), https://www.state.gov/reports/2020-country-reports-on-human-rights-practices/saudi-arabia/ (report by the Dept. of State detailing human rights violations by Saudi Arabia in 2020, including arbitrary and politically motivated killings, disappearances, denial of fair trials, and repression of civil liberties); *see also* U.S. DEPT. OF STATE, BUREAU OF DEMOCRACY, HUMAN RIGHTS, AND LABOR, 2020 COUNTRY REPORTS ON HUMAN RIGHTS PRACTICES: RUSSIA (March 30, 2021), https://www.state.gov/reports/2020-country-reports-on-human-rights-practices/russia/.
[40] Reis Thebault, *Long lines, high prices and fisticuffs: The 1970s gas shortages fueled bedlam in America*, WASHINGTON POST (May 13, 2021), https://www.washingtonpost.com/history/2021/05/13/gas-shortages-1970s/ (outlining the 1973 gas shortage as caused by OPEC and other factors of the "resources curse").
[41] Micheal D. Shear, Nicole Perlroth, & Clifford Krauss, *Colonial Pipeline Paid Roughly $5 Million in Ransom to Hackers*, NY TIMES (June 7, 2021), https://www.nytimes.com/2021/05/13/us/politics/biden-colonial-pipeline-ransomware.html (outlining the crisis caused when a hacker collective held an oil pipeline hostage through the installation of ransomware into their automated delivery system, additionally noting the disastrous consequences of future attacks and that many national security experts warn the most dangerous hacker collective are operating out of Russia, one of the largest crude oil importers to the U.S.).
[42] Charles K. Ebinger, *6 Years from the BP Deepwater Horizon Oil Spill: What We've Learned, and What We Shouldn't Misunderstand*, BROOKINGS INSTITUTION (Apr. 20, 2016), https://www.brookings.edu/blog/planetpolicy/2016/04/20/6-years-from-the-bp-deepwater-horizon-oil-spill-what-weve-learned-and-what-we-shouldnt-misunderstand/

climate change accelerates, effects such as increasingly severe weather events will make these spills more frequent.[43]

V. As the World's Largest Cumulative Greenhouse Emitter, the United States has a Moral Responsibility to Ban Fossil Fuel Imports from Russia in Conjunction with a Science-Based, All of Government Approach to the Climate Emergency

As stated by Svitlana Krakovska, Ukrainian delegate to IPCC: "Human induced climate change and the war on Ukraine have the same roots, fossil fuels…."[44] In addition to being the world's largest cumulative carbon emitter, the U.S. is the world's largest oil producer, and one of world's top coal producers.[45] The U.S. oil and gas industry is poised to release the world's largest burst of carbon emissions in the world over the next thirty years.[46]

For these reasons, the United States must ban fossil fuel imports from Russia in conjunction with an overall plan to phase out fossil fuels and decarbonize the U.S. economy. President Biden should fully utilize his ordinary and emergency executive powers to make substantial progress in rapidly phasing out fossil fuels and transition the country to a just and renewable energy system by 2030. This includes banning all fossil fuel infrastructure approvals and permanently ending federal fossil fuel leasing and drilling; enacting strong, technology forcing standards economy-wide under the Clean Air Act; declaring a national climate emergency to halt fossil fuel imports, exports, and overseas finance; igniting the green manufacturing base under the Defense Production Act to produce and deploy renewable energy and clean transportation while generating millions of good-paying, union jobs; and constructing distributed, resilient renewable energy systems in climate-vulnerable communities under the Stafford Act.

To decarbonize the U.S. economy and address the climate emergency, U.S. production, consumption, export, and import of fossil fuels must all fall to zero. If fossil fuel imports are left out of the policy equation, the threat they pose to national security will grow.[47]

Table 1 shows the overall oil consumption, production, imports, exports, and net imports by year, stated in millions of barrels per day. For the first time *ever*, the U.S. is now an overall oil exporting country according to recent statistics from the U.S. Energy Information Agency – the

---

[43] Alexandra Kelley, *Massive Number of Oil Spills Reported in Wake of Hurricane Ida*, THE HILL (Sept. 7, 2021), https://thehill.com/changing-america/sustainability/environment/571058-massive-number-of-oil-spills-reported-in-wake-of.

[44] Sarah Kaplan, *Russian climate delegate apologizes on Ukraine, saying many "fail to find any justification for the attack*," THE WASH. POST (February 27, 2022). https://www.washingtonpost.com/climate-environment/2022/02/27/ipcc-russian-apologizes-ukraine-climate/

[45] Statista, *Cumulative carbon dioxide emission from fossil fuel combustion from 1750 to 2020, by major country* https://www.statista.com/statistics/1007454/cumulative-co2-emissions-worldwide-by-country/; and GlobalData, *The top five coal producing countries*, https://www.eia.gov/tools/faqs/faq.php?id=709&t=6; https://www.globaldata.com/data-insights/mining/the-top-five-coal-producing-countries-million-tonnes-2021/ (both last visited on March 7, 2022).

[46] Kelly Trout, Drilling towards disaster: why U.S. oil and gas expansion is incompatible with climate limits (Oil Change International, January 2019), http://priceofoil.org/2019/01/16/report-drilling-towards-disaster/

[47] *See* Samantha Gross, *The United States Can Take Climate Change Seriously While Leading the World in Oil and Gas Production*, BROOKINGS (Jan. 27, 2020), https://www.brookings.edu/policy2020/bigideas/the-united-states-can-take-climate-change-seriously-while-leading-the-world-in-oil-and-gas-production/.

country exports more oil than it imports. In addition, U.S. oil production is at all-time high levels. Because the trade in oil itself contributes to global warming, and because the United States must begin to substantially reduce its oil consumption and production, national security dictates that the U.S. that drastically curtail both its imports and exports of this dangerous good under both its HTS numbers (2709 and 2710).

Table 1: Oil Flow in the United States in Millions of Barrels per Day

Year	Consumpt'n	Production	Imports	Exports	Net Imports
2016	19.687	14.625	10.055	5.261	4.795
2017	19.958	15.443	10.144	6.376	3.768
2018	20.504	17.732	9.943	7.601	2.341
2019	20.543	19.266	9.141	8.471	0.67
2020	18.12	18.4	7.857	8.508	-0.651

VI. Product Scope of this Petition

Petitioner herein identifies all imports of oil, gas, coal, petroleum and hydrocarbon products from Russia as impinging upon the national security of the United States. These articles and their subparts have an immense impact on GHG emissions both directly and indirectly. We request that the Department of Commerce investigate each of the requested articles and find that presidential action is necessary.

In addition to the emissions from the combustion of the oil itself, emissions from related production and transport operations also serve as a major cause of greenhouse gas pollution. Of chief importance is the release of significant methane pollution. Methane is a superpollutant, and traps eighty-seven times as much heat as carbon dioxide over a twenty-year period.[48] While the full extent of methane release from oil operations is not known because monitoring and measurement of leakage have not been historically required by U.S. law or regulations, EPA has estimated that "oil and gas systems are the largest human-made source of methane emissions and account for 37 percent of methane emissions in the United States and is expected to be one of the most rapidly growing sources of anthropogenic methane emissions in the coming decades."[49]

[48] IPCC, FIFTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, Chapter 8: Anthropogenic and Natural Radiative Forcing in Contribution of Working Group I, Table 8.7 (2013); Robert Howarth et al., Methane and the greenhouse-gas footprint of natural gas from shale formations, CLIMACTIC CHANGE (2011); D. Shindell, Improved Attribution of Climate Forcing to Emissions, 326 SCIENCE 716 (2009).

[49] *Natural Gas STAR Program, Basic Information, Major Methane Emission Sources and Opportunities to Reduce Methane Emissions*, U.S. EPA (Feb. 25, 2016) http://www3.epa.gov/gasstar/ basic-information/; *see also* G. Petron

That proportion is based on an estimated calculation of methane emissions, rather than measured actual emissions, which indicate that methane emissions may be much greater in volume than calculated.[50] For the oil industry, methane emissions result "primarily from field production operations . . . , oil storage tanks, and production-related equipment. . . ."[51] Emissions are released as planned, during normal operations and unexpectedly due to leaks and system upsets.[52] Significant sources of emissions include well venting and flaring, pneumatic devices, dehydrators and pumps, and compressors.[53]

Please see the Attachment for Crude and Refined Oil Imports, Gas, Coal, Petroleum and Hydrocarbon Products from Russia. This data is taken from existing U.S. federal government data compiled by the U.S. International Trade Commission (https://dataweb.usitc.gov/) and divided into tables for specific products described below.

A. HTS 2709 (crude oil products)

Petitioners identify all articles under HTS subchapter 2709.00 as within the scope of this petition. HTS subchapter 2709.00 categorizes crude oil products by density, under four subheadings: 2709.00.20; 2709.00.10.00; 2709.00.20.10; 2709.00.20.90. However, Crude oils is generally differentiated and compared by sulfur content and density. With respect to sulfur content, crude oil is either sweet, having a sulfur content of less than one percent, or sour, having a sulfur content of greater than one percent. With respect to density, crude oil can be light, medium, or heavy. Density is measured by A.P.I. gravity, the density of crude oil compared to the density of water. The greater the API gravity, the lighter the oil, and conversely, the lower the API gravity the heavier the oil. Lighter crude oils are typically more valuable. Oils with an API gravity of 22.3 to 31.1 degrees are considered medium crude oils. Oils with an API gravity of more than 31.1 degrees are considered light crude oils.

HTS 2709.00.20 applies to crude oil with an API gravity of 25 degrees or greater. This includes both light and medium crude oils.

HTS 2709.00.10.00 applies to crude oil with an API gravity under 25 degrees. This includes both medium and heavy crude oil. Heavy crude oils have a more severe environmental impact than lighter crude oils. According to the American Geoscientists Institute the lifecycle emissions of heavy crude oils range from 600 kg CO2 to nearly 750 kg CO2. Light crude oil is not far

---

et al., Hydrocarbon emissions characterization in the Colorado Front Range: A pilot study, 117 JOURNAL OF GEOPHYSICAL RESEARCH (2012).

[50] S.M. Miller et al.., Anthropogenic Emissions of Methane, PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES, EARLY EDITION (2013).

[51] MEGAN WILLIAMS & CINDY COPELAND, EARTHJUSTICE, METHANE CONTROLS FOR THE OIL AND GAS PRODUCTION SECTOR (2010), http://psbweb.co.kern.ca.us/UtilityPages/Planning/EIRS/mckittrick_landfill/Vol5/Williams%20&%20Copeland%20Earthjustice%202010_Methane%20Controls%20for%20the%20O&G.pdf

[52] *Id.*

[53] *Natural Gas STAR Program*, *supra* note 49.

behind with lifecycle emissions of 480 kg CO2 for typical West Texas oil.[54] Additionally, heavy crude oils are more energy and water intensive to extract, and contain contaminants that must either be disposed of or removed before they are commercially usable.

HTS 2709.00.20.10 applies to condensate wholly derived from gas. Gas condensate has a variety of uses in the oil production lifecycle. It is used as a feedstock in refining, heating, and plastics production, as well as a diluent to improve the flow of heavy oils which cannot flow well through pipelines due to the heavy oils' viscosity.

HTS 2709.00.20.90 is the other category for crude oils testing 25 degrees A.P.I. or more. Typically, these are synthetic crude oils. For example, two blends of synthetic crude oil, Zuata and Hamaca, originating from Venezuela were classified under HTS 2709.00.20.90 by U.S. Customs and Border Protection's Office of Trade Relations. The oil from these wells were fractioned with some of the resulting oils being used as refinery feedstock. Refinery feedstock is oils that are reused in the refining process to create higher value oils.

B. HTS 2710 (refined oil products)

The Center identifies the following articles as within the scope of this petition: all articles under 2710.12.15; 2710.19.06; 2710.19.11; 2710.19.16.00; all articles under 2710.20 except 2710.20.25.00; 2710.99.05.00; and 2710.99.10.00. These articles are various refined oils that are primarily used as fuels. Excluded from this petition are refined oil products that are either waste products or products that are not used as fuel.

C. COAL PRODUCTS UNDER HTS 2701, PETROLEUM GAS AND HYDROCARBON PRODUCTS UNDER HTS 2711, AND PETCOKE[55] UNDER HTS 2713

See the Attachment for more information on U.S. imports of coal, gas, petroleum, and hydrocarbon products from Russia.

VII. Relief Requested

President Biden and his Commerce Department clearly possess the authority to stop the import of dangerous and deadly petroleum products under Section 232 of the U.S. Trade Act. Now is the time to use and implement this authority to protect the national security of the country and advance the campaign goals of the President. *As it specifically relates to the Russian Federation, this petition asks for an agency recommendation of a complete ban of imports of all Russian oil, gas, coal, petroleum and hydrocarbon products into the United States*

[54] West Texas Oil is a benchmark oil produced in the United States. It is a lighter crude oil with an API gravity of 39.6 degrees, and a "sweet" oil, or an oil with low sulfur content.

[55] *See* U.S. Energy Information Administration (last visited March 6, 2022). https://www.eia.gov/dnav/pet/PET_MOVE_IMPCUS_A1_NRS_EPPCM_IM0_MBBL_M.htm

under HTS Numbers 2701, 2709, 2710, 2711, and 2713. See the Attachment to this Petition on relevant subheadings under these HTS Numbers.

Section 232 allows the President "to adjust the imports of the article and its derivatives," if Commerce decides that presidential action is required.[56] The previous President exercised his authority under Section 232 by imposing tariffs.[57] However, tariffs are only one type of action that a President might take.[58] *For national security reasons, an import ban by the U.S. is necessary and justified regarding the Russian Federation's export of fossil fuels to the United States.*[59] The amount of greenhouse pollution from these Russian imports is significant and there is reason to believe Russia will have difficulty finding substitute buyers. U.S. purchasing power should not fuel an illegal war in Ukraine.[60]

Petitioner notes that the President also possesses powers under the National Emergencies Act[61] and the International Emergency Economic Powers Act[62] to effectuate a ban on Russian oil and fossil fuel products.

[56] 19 U.S.C. § 1862(c)(1)(a)(ii).
[57] *See* Adjusting Imports of Aluminum into the United States, 83 Fed. Reg. 20677 (May 7, 2018) (imposing tariffs on aluminum imports into the United States); Adjusting Imports of Steel into the United States, 83 Fed. Reg. 45025 (Sept. 4, 2018) (imposing tariffs on steel imports into the United States).
[58] *See* BUREAU OF INDUS. & SEC., DEP'T OF COMMERCE, 2001 REPORT AT 13–20 (2001) (recording adjustable licensing fees, supplemental fees, conservation fees, termination of imports, adjusting existing domestic and foreign policy, embargoes, voluntary restraint agreements, as actions taken by the president after finding that the import of an article implicated the national security of the United States).
[59] Suriya Jayanti, an Eastern European energy expert and former diplomat explains many of the reasons why this action is justified by both law and policy. https://time.com/6151766/u-s-sanctions-against-russia-gas-oil/
[60] Hawaii has already effectively stopped the import of Russian oil. Press Release, *Grassroots Institute requests one year Jones Act waiver for fuel imports* (March 3, 2022). https://www.grassrootinstitute.org/2022/03/news-release-grassroot-institute-requests-1-year-jones-act-waiver-for-fuel-imports/

[61] 50 U.S.C. Section 1621.
[62] 50 U.S.C. Sections 1701 *et seq*.

VIII. Conclusion

For all the reasons so stated, we hereby petition the U.S. Department of Commerce to initiate an investigation on the impact of fossil fuel imports from the Russian Federation upon U.S. national security. Within 270 days after initiating this investigation, the Secretary of Commerce must provide a report to the President, with a determination as to whether the subject articles impinge on the national security and any recommendations as to actions necessary to protect U.S. national security. Fossil fuels from Russia are driving and funding the current Ukrainian crisis, significantly contributing to the calamity of climate change, and severely threatening the national security of the United States. Time of is of the essence and we urge you to act promptly.

Respectfully submitted,

/s/ WJ Snape, III

William J. Snape, III

Senior Counsel

Center for Biological Diversity

Contact Information:

Center for Biological Diversity

1411 K Street, NW

Suite 1300

Washington, DC 20005

202-536-9351

bsnape@biologicaldiversity.org

Dated: March 7, 2022

Attachment: U.S. Imports of Russian Fossil Fuels by HTS designation

ATTACHMENT TO RUSSIAN FOSSIL FUEL IMPORT PETITION
STATISTICS FROM U.S. INTERNATIONAL TRADE COMMISSION

https://dataweb.usitc.gov/

U.S. IMPORTS OF RUSSIAN CRUDE AND REFINED OIL PRODUCTS UNDER HTS 2709 & HTS 2710, COAL PRODUCTS UNDER HTS 2701, PETROLEUM GAS AND RELATED HYDROCARBON PRODUCTS UNDER HTS 2711, AND PETROLEUM COKE PRODUCTS UNDER HTS 2713 (2000-2021)

1. **HTS 2709 (crude oil products)**

HTS 2709.00.20 – Petroleum Oils

Imports For Consumption | Annual Data | HTS 2709.00.20	
Year	**Barrels**
2000	833,794
2001	0
2002	4,358,473
2003	21,996,394
2004	20,462,476
2005	31,564,385
2006	19,237,861
2007	21,573,382
2008	27,761,034
2009	35,191,022
2010	43,709,157
2011	29,581,866
2012	17,625,596
2013	7,682,244
2014	939,868
2015	2,890,867
2016	5,437,085
2017	11,264,506
2018	16,853,540
2019	26,832,521
2020	17,322,407
2021	48,718,241
Total	**411,836,719**

HTS 2709.00.20.10 – Petroleum Oils above 15 A.P.I. derived from Natural Gas

Imports For Consumption | Annual Data | HTS 2709.00.20.10	
Year	**Barrels**
2000	0
2001	0
2002	0
2003	0
2004	0
2005	1,095,048
2006	2,565,127
2007	3,524,644
2008	3,797,710
2009	2,009,241
2010	1,489,325
2011	100,830
2012	740,869
2013	0
2014	0
2015	0
2016	0
2017	0
2018	0
2019	0
2020	0
2021	0
Total	**15,322,794**

HTS 2709.00.20.90 – Petroleum Oils above 25 A.P.I.

Imports For Consumption | Annual Data | HTS 2709.00.20.90	
Year	**Barrels**
2000	0
2001	0
2002	4,358,473
2003	21,996,394
2004	20,462,476
2005	30,469,337
2006	16,672,734
2007	18,048,738
2008	23,963,324

2009	33,181,781
2010	42,219,832
2011	29,481,036
2012	16,884,727
2013	7,682,244
2014	939,868
2015	2,890,867
2016	5,437,085
2017	11,264,506
2018	16,853,540
2019	26,832,521
2020	17,322,407
2021	48,718,241
Total	**395,680,131**

2. HTS 2710 (refined oil products)

HTS 2710.12.15 – Light Motor Fuels

Imports For Consumption | Annual Data | HTS 2710.12.15	
Year	**Barrels**
2000	0
2001	0
2002	0
2003	0
2004	0
2005	0
2006	0
2007	0
2008	0
2009	0
2010	0
2011	0
2012	3,094,094
2013	4,627,478
2014	5,359,629
2015	4,539,899
2016	4,718,099
2017	4,539,580
2018	8,080,284
2019	15,844,448

2020	11,002,678
2021	16,642,909
Total	**78,449,098**

HTS 2710.19.06 – Residual Fuel Oil (Blends less than 25 A.P.I.)

Imports For Consumption | Annual Data | HTS 2710.19.06	
Year	**Barrels**
2000	0
2001	0
2002	0
2003	0
2004	0
2005	0
2006	0
2007	0
2008	0
2009	0
2010	0
2011	0
2012	124,285,662
2013	125,306,218
2014	76,435,753
2015	96,638,800
2016	116,389,292
2017	91,599,365
2018	87,566,488
2019	116,797,987
2020	149,845,109
2021	134,594,470
Total	**1,119,459,144**

HTS 2710.19.11 – Residual Fuel Oil (Blends above 25 A.P.I)

Imports For Consumption | Annual Data | HTS 2710.19.11	
Year	**Barrels**
2000	0
2001	0
2002	0
2003	0

2004	0
2005	0
2006	0
2007	0
2008	0
2009	0
2010	0
2011	0
2012	24,493,236
2013	19,298,355
2014	26,977,448
2015	21,055,335
2016	15,387,619
2017	15,690,103
2018	12,937,042
2019	9,781,417
2020	12,793,455
2021	21,866,315
Total	**180,280,325**

HTS 2710.19.16.00 – Kerosene-Type Jet Fuel

Imports For Consumption | Annual Data | HTS 2710.19.06	
Year	**Barrels**
2000	0
2001	0
2002	0
2003	0
2004	0
2005	0
2006	0
2007	0
2008	0
2009	0
2010	0
2011	0
2012	737,125
2013	368,074
2014	0
2015	10,318

2016	33,317
2017	561,855
2018	28,835
2019	56,685
2020	25,417
2021	1,402,939
Total	**3,224,565**

3. **HTS 2701 – Coal and Solid Fuels Manufactured from Coal**

HTS 2701.11 - Anthracite

Imports For Consumption | Annual Data | HTS 2701.11	
Year	**Metric Tons**
2000	0
2001	0
2002	0
2003	62,197
2004	128,043
2005	0
2006	16,480
2007	0
2008	64
2009	0
2010	0
2011	1
2012	13,000
2013	0
2014	0
2015	0
2016	5,501
2017	31,251
2018	27,583
2019	62,350
2020	198,839
2021	307,126
Total	**852,435**

HTS 2701.19 – Other Coal

Imports For Consumption | Annual Data | HTS 2701.19	
Year	**Metric Tons**

2000	0
2001	198,743
2002	0
2003	0
2004	56,703
2005	258,940
2006	749,204
2007	122,099
2008	0
2009	0
2010	0
2011	0
2012	0
2013	0
2014	0
2015	0
2016	0
2017	0
2018	0
2019	0
2020	0
2021	0
Total	**1,385,689**

HTS 2701.12 – Bituminous Coal

Imports For Consumption | Annual Data | HTS 2701.12	
Year	**Metric Tons**
2000	0
2001	0
2002	79,457
2003	0
2004	54,547
2005	98,120
2006	87,690
2007	0
2008	0
2009	0
2010	0
2011	160
2012	0

2013	33,017
2014	38,500
2015	0
2016	53,772
2017	0
2018	44,000
2019	0
2020	53,861
2021	0
Total	**543,124**

4. HTS 2711 – Petroleum Gases and other Gaseous Hydrocarbons

HTS 2711.11 – Liquified Natural Gas

Imports For Consumption | Annual Data | HTS 2711.11	
Year	**Cubic Meters**
2000	0
2001	0
2002	0
2003	0
2004	0
2005	0
2006	69,000
2007	17
2008	2,000
2009	0
2010	20,100
2011	0
2012	0
2013	0
2014	0
2015	0
2016	0
2017	35,897
2018	0
2019	258,379
2020	0
2021	0
Total	**385,393**

HTS 2711.21 – Natural Gas

Imports For Consumption | Annual Data | HTS 2711.21	
Year	**Cubic Meters**
2000	0
2001	0
2002	74,000
2003	128,448
2004	47,001
2005	100,000
2006	0
2007	0
2008	0
2009	0
2010	7,000
2011	12
2012	0
2013	2
2014	0
2015	0
2016	0
2017	0
2018	0
2019	0
2020	0
2021	0
Total	**356,463**

HTS 2711.12 – Propane (Liquefied)

Imports For Consumption | Annual Data | HTS 2711.12	
Year	**Cubic Meters**
2000	60,995
2001	1,942
2002	1,748,244
2003	2,433,780
2004	1,566,461
2005	1,253,099
2006	1,860,984
2007	2,286,906
2008	1,324,125
2009	2,743,814

2010	1,696,831
2011	1,999,828
2012	1,160,850
2013	1,020,263
2014	609,294
2015	170,121
2016	440,295
2017	244,141
2018	927,098
2019	323,995
2020	165,395
2021	410,204
Total	**24,448,665**

HTS 2711.13 – Butanes (Liquified)

Imports For Consumption | Annual Data | HTS 2711.13	
Year	**Cubic Meters**
2000	0
2001	0
2002	319,936
2003	566,903
2004	381,276
2005	569,500
2006	190,632
2007	771,570
2008	169,701
2009	1,411,860
2010	1,565,030
2011	2,797,200
2012	139,576
2013	536,573
2014	148,065
2015	0
2016	103,531
2017	187,484
2018	520,114
2019	153,319
2020	56,140
2021	138,472

Total	**10,726,882**

HTS 2711.14 – Ethylene, Propylene, Butylene, and Butadiene

Imports For Consumption | Annual Data | HTS 2711.14	
Year	**Kilograms**
2000	4,352,591
2001	12,057,850
2002	240,937,941
2003	257,584,778
2004	300,644,477
2005	252,601,711
2006	177,022,992
2007	187,660,488
2008	116,206,457
2009	196,500,525
2010	264,677,147
2011	157,250,661
2012	30,873,841
2013	18,890,959
2014	4,409,273
2015	0
2016	0
2017	637,973
2018	17,985,430
2019	69,486,610
2020	73,348,217
2021	114,646,730
Total	**2,497,776,651**

HTS 2711.19 – Ethane

Imports For Consumption | Annual Data | HTS 2711.19	
Year	**Kilograms**
2000	0
2001	4,728,209
2002	18,085,385
2003	26,276,508
2004	44,457,111
2005	18,336,297

2006	49,792,521
2007	39,410,628
2008	45,799,876
2009	21,707,922
2010	42,209,896
2011	21,534,315
2012	23,022,644
2013	5,420,785
2014	0
2015	1,810,668
2016	0
2017	0
2018	0
2019	2,026,020
2020	0
2021	0
Total	**364,618,785**

HTS 2711.29 – Petroleum Gases and Other Gaseous Hydrocarbons in a Gaseous State (Other Than Natural Gas)

Imports For Consumption | Annual Data | HTS 2711.29	
Year	**Kilograms**
2000	0
2001	0
2002	3,034,008
2003	5,300,762
2004	5,221,733
2005	4,741,978
2006	5,623,738
2007	6,539,804
2008	4,855,140
2009	7,462,488
2010	7,897,347
2011	7,853,536
2012	2,940,311
2013	2,359,451
2014	648,528
2015	985,434
2016	1,129,329
2017	1,183,156

2018	1,544,390
2019	529,832,444
2020	357,751,013
2021	391,187,911
Total	**1,348,092,501**

5. HTS 2713 – Petroleum Coke (Petcoke)

HTS 2713.11 – Petroleum Coke, Not Calcined

Imports For Consumption | Annual Data | HTS 2713.11	
Year	**Metric Tons**
2000	43,246
2001	0
2002	508,538
2003	868,134
2004	618,152
2005	559,622
2006	736,367
2007	991,797
2008	626,606
2009	985,540
2010	735,641
2011	702,414
2012	297,898
2013	294,716
2014	91,680
2015	80,244
2016	120,828
2017	199,085
2018	221,642
2019	665,463
2020	267,405
2021	400,479
Total	**10,015,497**

HTS 2713.12 – Petroleum Coke, Calcined

Imports For Consumption | Annual Data | HTS 2713.12	
Year	**Metric Tons**
2000	0

2001	0
2002	0
2003	0
2004	0
2005	0
2006	0
2007	0
2008	0
2009	22,531
2010	47,970
2011	251,524
2012	49,927
2013	0
2014	0
2015	0
2016	0
2017	0
2018	0
2019	0
2020	0
2021	0
Total	**371,952**

HTS 2713.20 – Petroleum Bitumen

Imports For Consumption | Annual Data | HTS 2713.20	
Year	**Metric Tons**
2000	0
2001	0
2002	135,787
2003	99,987
2004	160,689
2005	96,338
2006	125,006
2007	179,143
2008	78,182
2009	176,980
2010	171,594
2011	100,678
2012	53,114
2013	5,928

2014	57,517
2015	22,084
2016	42,320
2017	8,178
2018	70,458
2019	28,649
2020	92,472
2021	68,755
Total	**1,773,859**

HTS 2713.90 – Residues of Petroleum Oils or of Oils Obtained from Bituminous Minerals

Imports For Consumption | Annual Data | HTS 2713.90	
Year	**Metric Tons**
2000	0
2001	0
2002	4,928
2003	19,100
2004	0
2005	0
2006	7,839
2007	0
2008	1,130
2009	1,813
2010	244
2011	2,580
2012	0
2013	0
2014	0
2015	4,786
2016	0
2017	0
2018	0
2019	0
2020	0
2021	0
Total	**42,420**