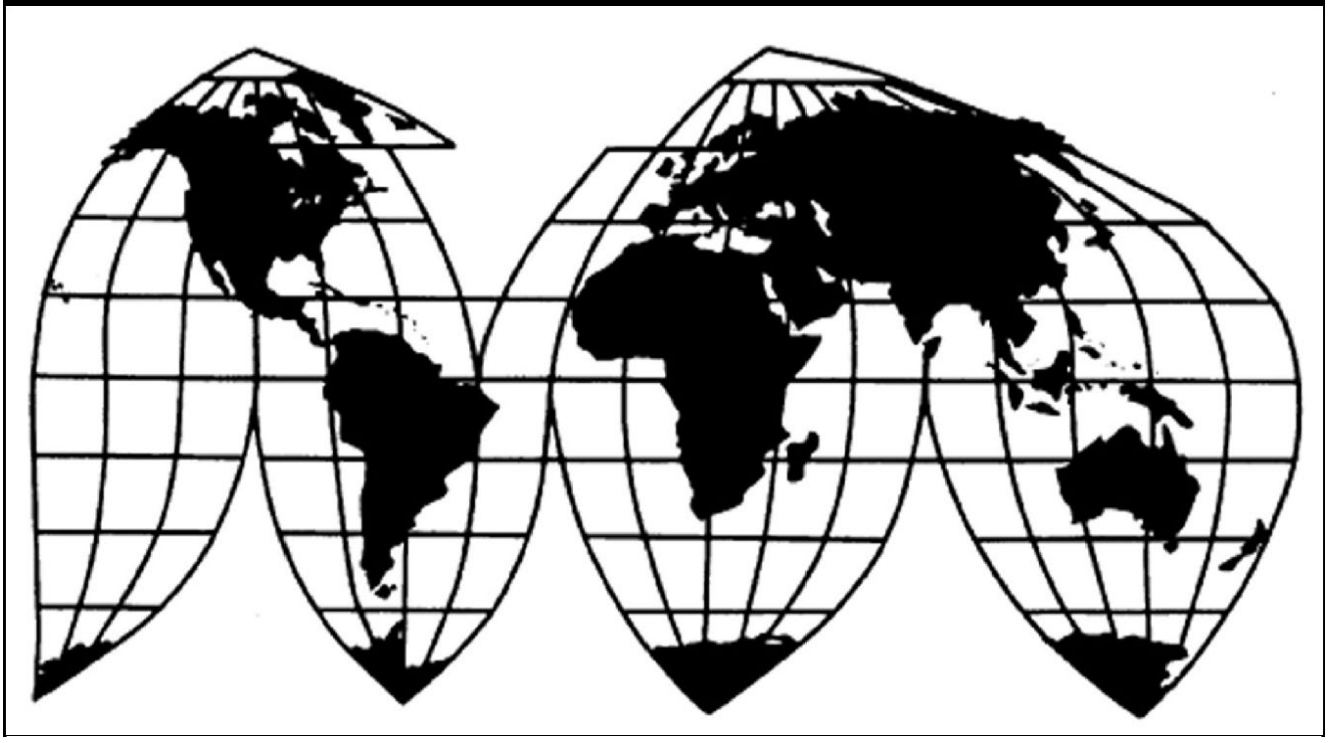
Common Alloy Aluminum Sheet from China

Investigation Nos. 701-TA-591 and 731-TA-1399 (Review)

Publication 5538 **August 2024**

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

COMMISSIONERS

Amy A. Karpel, Chair
David S. Johanson
Rhonda K. Schmidtlein
Jason E. Kearns

Catherine DeFilippo

Director of Operations

Staff assigned

Caitlyn Costello, Investigator
Kelsi Van Veen, Industry Analyst
James Horne, Economist
Frank Morgan, Attorney
Mary Messer, Supervisory Investigator

Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

Common Alloy Aluminum Sheet from China

Investigation Nos. 701-TA-591 and 731-TA-1399 (Review)

Publication 5538

August 2024

CONTENTS

Page

Appendixes

Note: Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets or by headings in confidential reports and is deleted and replaced with asterisks in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-591 and 731-TA-1399 (Review)

Common Alloy Aluminum Sheet from China

DETERMINATIONS

On the basis of the record[1] developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing and antidumping duty orders on common alloy aluminum sheet from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[2]

BACKGROUND

The Commission instituted these reviews on January 2, 2024 (89 FR 96) and determined on April 8, 2024 that it would conduct expedited reviews (89 FR 43873, May 20, 2024).

[1] The record is defined in § 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR 207.2(f)).

[2] Chair Amy A. Karpel not participating.

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the antidumping and countervailing duty orders on common alloy aluminum sheet ("CAAS") from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigations. On December 1, 2017, the Commission received a notification from the U.S. Department of Commerce ("Commerce") that it had self-initiated antidumping and countervailing duty investigations on imports of CAAS from China.[1] On November 15, 2018, Commerce determined that imports of CAAS from China were being sold at less than fair value ("LTFV") and subsidized by the government of China.[2] On January 30, 2019, the Commission determined that a domestic industry was materially injured by reason of imports of CAAS from China that Commerce determined were being sold at LTFV and subsidized.[3] Commerce issued countervailing and antidumping duty orders on CAAS from China on February 6 and 8, 2019, respectively.[4]

Current Reviews. On January 2, 2024, the Commission instituted these first five-year reviews to determine whether revocation of the antidumping and countervailing duty orders on CAAS from China would likely lead to the continuation or recurrence of material injury to a domestic industry.[5] The Aluminum Association Common Alloy Aluminum Sheet Trade Enforcement Working Group and its individual members ("Aluminum Association") filed the sole

[1] *Common Alloy Aluminum Sheet from China*, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final), Pub. 4861 (Jan. 2019) ("*Original Determination*") at I-1.

[2] *Antidumping Duty Investigation of Common Alloy Aluminum Sheet from the People's Republic of China: Affirmative Final Determination of Sales at Less than Fair Value*, 83 Fed. Reg. 57421 (Nov. 15, 2018); *Countervailing Duty Investigation of Common Alloy Aluminum Sheet from the People's Republic of China: Final Affirmative Determination*, 83 Fed. Reg. 57427 (Nov. 15, 2018).

[3] *Original Determination* at 1.

[4] *Common Alloy Aluminum Sheet from China: Countervailing Duty Order*, 84 Fed. Reg. 2157 (Feb. 6, 2019); *Common Alloy Aluminum Sheet from China: Antidumping Duty Order*, 84 Fed. Reg. 2813 (Feb. 8, 2019).

[5] *Common Alloy Aluminum Sheet from China: Institution of a Five-Year Review*, 89 *Fed.* Reg. 96 (Jan. 2, 2024).

response to the notice of institution.[6] The Commission did not receive a response from any respondent interested party. On April 8, 2024, the Commission determined that the domestic industry party group response was adequate and that the respondent interested party group response was inadequate.[7] Finding no other circumstances that would warrant conducting full reviews the Commission determined that it would conduct expedited reviews of the orders.[8] The Aluminum Association submitted final comments regarding the determinations that the Commission should reach.[9]

U.S. industry data in these reviews are based on information provided in response to the notice of institution by seven firms that accounted for approximately 91.4 percent of production of CAAS in the United States and publicly available information compiled by the Commission.[10] U.S. import data are based on official Commerce statistics.[11] Foreign industry data and related information are based on information from the original investigations and information submitted by the Aluminum Association in its response to the notice of institution, as well as publicly

---

[6] Aluminum Association's Response to the Notice of Institution ("NOI"), EDIS Doc. Nos. 813090 (Confidential Version) & 813191 (Public Version) (Feb. 1, 2024) ("Aluminum Association's NOI Response"). The Aluminum Association also submitted a supplemental response to the NOI. Aluminum Association's Supplement to the NOI, EDIS Doc. No. 815121 (Public Document) (Feb. 28, 2024). Finally, the Aluminum Association submitted a correction to its supplemental response. Aluminum Association's Correction to the Supplement to the NOI, EDIS Doc. Nos. 816406 (Confidential Version) & 816407 (Public Version) (Mar. 20, 2024). The Aluminum Association consists of the following individual members that produce the domestic like product in the United States: Arconic Corporation ("Arconic"), Commonwealth Rolled Products, Inc. ("Commonwealth Rolled Products"), Constellium Rolled Products Ravenswood, LLC ("Constellium Rolled Products"), Jupiter Aluminum Corporation ("Jupiter Aluminum"), JW Aluminum Company ("JW Aluminum"), Novelis Corporation ("Novelis"), and Texarkana Aluminum, Inc. ("Texarkana Aluminum").

[7] Explanation of Commission Determination on Adequacy, EDIS Doc. 818622 (Apr. 16, 2024).

[8] Explanation of Commission Determination on Adequacy, EDIS Doc. 818622 (Apr. 16, 2024).

[9] Aluminum Association's Final Comments, EDIS Doc. Nos. 828008 (Confidential Version) & 828009 (Public Version) (Aug. 1, 2024).

[10] Confidential Report ("CR"), INV-WW-006 at I-17; Public Report ("PR"), *CAAS from China*, Inv. Nos. 701-TA-591 and 731-TA-1399 (Review), USITC Pub. 5538 (Aug. 2024) at I-17. The seven U.S. producers that provided data were Arconic, Commonwealth Rolled Products, Constellium Rolled Products, Jupiter Aluminum, JW Aluminum, Novelis, and Texarkana Aluminum. CR/PR at I-2 n.5, Tables I-2, B-2.

[11] CR/PR at I-21 and Table I-7. Official import statistics are for HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, and 7606.92.6095. These data may be overstated as HTS statistical reporting numbers 7606.91.3095, 7606.91.6095, 7606.92.3035, and 7606.92.6095 may contain products outside the scope of these reviews. HTS statistical reporting numbers 7606.12.3090, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080 were discontinued; effective July 2019 (see "U.S. tariff treatment" section). *Id.* at Table I-7 Note.

available information compiled by the Commission.[12] Additionally, one firm, ***, identified by the Aluminum Association as a U.S. purchaser of CAAS, responded to the Commission's adequacy phase questionnaire.[13]

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."[14] The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle."[15] The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.[16]

Commerce has defined the imported merchandise within the scope of the orders under review as follows:

> The merchandise covered by this order is aluminum common alloy sheet (common alloy sheet), which is a flat-rolled aluminum product having a thickness of 6.3 mm or less, but greater than 0.2 mm, in coils or cut-to length, regardless of width. Common alloy sheet within the scope of this order includes both not clad aluminum sheet, as well as multi-alloy, clad aluminum sheet. With respect to not clad aluminum sheet, common alloy sheet is manufactured from a 1XXX-, 3XXX-, or 5XXX-series alloy as designated by the Aluminum Association. With respect to multi-alloy, clad aluminum sheet, common alloy sheet is produced from a 3XXX-series core, to which cladding layers are applied to either one or both sides of the core.

---

[12] CR/PR at I-25.

[13] CR/PR at D-3.

[14] 19 U.S.C. § 1677(4)(A).

[15] 19 U.S.C. § 1677(10); *see*, *e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

[16] *See*, *e.g.*, *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA- 752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731- TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

Common alloy sheet may be made to ASTM specification B209–14, but can also be made to other specifications. Regardless of specification, however, all common alloy sheet meeting the scope description is included in the scope. Subject merchandise includes common alloy sheet that has been further processed in a third country, including but not limited to annealing, tempering, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of this order is aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans. Aluminum can stock is produced to gauges that range from 0.200 mm to 0.292 mm, and has an H–19, H–41, H–48, or H–391 temper. In addition, aluminum can stock has a lubricant applied to the flat surfaces of the can stock to facilitate its movement through machines used in the manufacture of beverage cans. Aluminum can stock is properly classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7606.12.3045 and 7606.12.3055.

Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set for the above.[17]

CAAS is a thin wrought aluminum product that is produced via a rolling process.[18] It is produced in a variety of levels of thickness.[19] CAAS is used in a wide variety of industry sectors, including building and construction, electrical, infrastructure, marine, and transportation, where properties such as strength, light weight, formability, and corrosion resistance are desired.[20]

In its original determinations, the Commission defined a single domestic like product consisting of all CAAS coextensive with Commerce's scope.[21]

---

[17] *Common Alloy Aluminum Sheet from the People's Republic of China: Final Results of the First Expedited Sunset Review of the Countervailing Duty Order*, 89 Fed. Reg. 38095 (May 7, 2024) and accompanying Issues and Decision Memorandum at 2; *Common Alloy Aluminum Sheet from the People's Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 89 Fed. Reg. 38096 (May 7, 2024) and accompanying Issues and Decision Memorandum at 2.

[18] CR/PR at I-9.

[19] CR/PR at I-9.

[20] CR/PR at Table I-4.

[21] *Original Determination*, USITC Pub. 4861 at 11.

In the current reviews, the record does not contain any new information suggesting that the pertinent characteristics and uses of CAAS have changed since the original investigations so as to warrant revisiting the Commission's domestic like product definition.[22] The Aluminum Association agrees with the Commission's definition of the domestic like product from the original investigations.[23] Consequently, we again define a single domestic like product consisting of CAAS coextensive with the scope of the reviews.

B. Domestic Industry and Related Parties

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[24] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act.[25] This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[26] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[27]

---

[22] CR/PR at I-9.

[23] Aluminum Association's NOI Response at 20.

[24] 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

[25] *See* 19 U.S.C. § 1677(4)(B).

[26] *See Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.,* 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

[27] The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

(1) the percentage of domestic production attributable to the importing producer;

(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(Continued …)

1. Original Investigations

In the original investigations, the Commission defined a single domestic industry comprised of all domestic producers of CAAS.[28] In the current review, the Aluminum Association agrees with the Commission's definition of the domestic industry from the prior proceeding.[29]

2. Current Reviews

In these reviews, domestic producer Gränges Americas Inc. is affiliated with Granges Aluminum (Shanghai) Ltd., a producer of CAAS in China.[30] The Tariff Act provides that a domestic producer is a related party based on its relationship with an importer or exporter.[31] There is no evidence on the record that Gränges Americas Inc. imported subject merchandise during the POR or is affiliated with an importer who imported subject merchandise during the POR.[32] However, the evidence on the record does not indicate whether Granges Aluminum (Shanghai) Ltd. exported subject merchandise to the United States since the orders were issued in February 2019 (*i.e.*, during the period of review or "POR"). Therefore, the record does not allow a determination of whether Gränges Americas qualifies as a related party for purposes of the related parties provision.

Even if Gränges Americas Inc. were a related party, we find that appropriate circumstances would not exist to exclude it from the domestic industry. There is no evidence on the record that Gränges Americas Inc.'s affiliation with the Chinese producer benefitted its domestic production operations such that its inclusion would mask injury to the domestic industry, and no party has argued for its exclusion.

In sum, consistent with our definition of the domestic like product, we again define the domestic industry as all domestic producers of CAAS.

---

(4) the ratio of import shipments to U.S. production for the imported product; and
(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l Trade 2015), *aff'd*, 879 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

[28] *Original Determination*, USITC Pub. 4861 at 14.

[29] Aluminum Association's NOI Response at 20.

[30] Aluminum Association's Supplemental NOI Response at 2.

[31] *See* 19 U.S.C. § 1677(4)(B).

[32] Aluminum Association's Supplemental NOI Response at 2.

III. Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time."[33] The SAA states that "under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."[34] Thus, the likelihood standard is prospective in nature.[35] The U.S. Court of International Trade has found that "likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.[36]

The statute states that "the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of

---

[33] 19 U.S.C. § 1675a(a).

[34] SAA, H.R. Rep. No. 103-316 vol. I at 883-84. The SAA states that "{t}he likelihood of injury standard applies regardless of the nature of the Commission's original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed." *Id*. at 883.

[35] While the SAA states that "a separate determination regarding current material injury is not necessary," it indicates that "the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked." SAA at 884.

[36] *See NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int'l Trade 2003) ("'likely' means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)"), *aff'd mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) ("more likely than not" standard is "consistent with the court's opinion;" "the court has not interpreted 'likely' to imply any particular degree of 'certainty'"); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) ("standard is based on a likelihood of continuation or recurrence of injury, not a certainty"); *Usinor v. United States*, 26 CIT 767, 794 (2002) ("'likely' is tantamount to 'probable,' not merely 'possible'").

time."[37] According to the SAA, a "'reasonably foreseeable time' will vary from case-to-case, but normally will exceed the 'imminent' timeframe applicable in a threat of injury analysis in original investigations."[38]

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated."[39] It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).[40] The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.[41]

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.[42] In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country,

---

[37] 19 U.S.C. § 1675a(a)(5).

[38] SAA at 887. Among the factors that the Commission should consider in this regard are "the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities." *Id*.

[39] 19 U.S.C. § 1675a(a)(1).

[40] 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. *See Common Alloy Aluminum Sheet from the People's Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 89 Fed. Reg. 38096 (May 7, 2024).

[41] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[42] 19 U.S.C. § 1675a(a)(2).

which can be used to produce the subject merchandise, are currently being used to produce other products.[43]

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.[44]

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.[45] All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.[46]

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the CAAS industry in China. There is also limited information on the CAAS market in the United States during the POR.

---

[43] 19 U.S.C. § 1675a(a)(2)(A-D).

[44] *See* 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

[45] 19 U.S.C. § 1675a(a)(4).

[46] The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission "considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports." SAA at 885.

Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations, and the limited new information on the record in these five-year reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[47] The following conditions of competition inform our determination.

1. Demand Conditions

Original Investigations. U.S. demand for CAAS is derived from demand for downstream products; reported end uses included roof coil, common alloy coil, auto heat shields, commercial transportation equipment, residential siding, gutters and downspouts, general fabrication, and HVAC equipment.[48] Apparent U.S. consumption increased during the original investigations.[49]

Current Reviews. There is no new information on the record of these reviews indicating that the factors influencing demand have changed since the original investigations. The record indicates that demand for CAAS continues to derive from demand in downstream products.[50] The Aluminum Association claims that U.S. demand for CAAS generally increased during the POR but declined from 2020 to 2021 due to the impact of COVID-19.[51]

In 2023, apparent U.S. consumption of CAAS was 1.8 million short tons, 15.4 percent lower than the 2.2 million short tons recorded in 2017, the terminal year of the period of investigation ("POI").[52]

2. Supply Conditions

Original Investigations. In the original investigations, the domestic industry was the largest supplier to the U.S. market, accounting for 54.5 percent of apparent U.S. consumption.[53] Subject imports from China were the largest individual source of import supply in the U.S. market during the POI, accounting for 17.9 percent of apparent U.S. consumption at the end of the period

---

[47] 19 U.S.C. § 1675a(a)(4).
[48] *Original Determination*, USITC Pub. 4861 at 18.
[49] *Original Determination*, USITC Pub. 4861 at 18.
[50] Aluminum Association's NOI Response at 19.
[51] Aluminum Association's NOI Response at 19-20.
[52] Calculated from CR/PR at Table I-8.
[53] *Original Determination*, USITC Pub. 4861 at 18.

in 2017.[54] Nonsubject imports' collective share of apparent U.S. consumption was 27.6 percent in 2017.[55] The largest sources of nonsubject imports were Canada and Indonesia.[56]

Current Reviews. In the current reviews, the domestic industry remains the largest supplier of CAAS to the U.S. market, followed by nonsubject imports and subject imports.[57] The domestic industry's share of apparent U.S. consumption by quantity was 71.7 percent in 2023, up from 54.5 percent in 2017.[58] There were 14 known U.S. producers during the POR with the seven firms that provided U.S. industry data in response to the Commission's notice of institution accounting for approximately 91.4 percent of production of CAAS in the United States during 2023.[59]

Subject imports maintained a small presence in the U.S. market during the POR; their volume was 30,528 short tons in 2023 (1.7 percent of apparent U.S. consumption), a 92.2 percent decline since 2017.[60] Subject imports' market share was 1.7 percent in 2023, down from 17.9 percent in 2017.[61] Nonsubject import volume was 492,142 short tons in 2023, an 18.3 percent decline since 2017; their market share was 26.6 percent in 2023, down only slightly from 27.6 percent in 2017.[62] The leading source of nonsubject imports during the POR was Canada.[63]

3. Substitutability and Other Conditions

Original Investigations. In the original investigations, the Commission found a moderate-to-high degree of substitutability between domestically produced CAAS and CAAS imported from China.[64] The Commission also found that price was among the most important factors in purchasing decisions.[65]

Current Reviews. The record in these five-year reviews contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports, or the importance of price in purchasing decisions, have changed since the original investigations. The Aluminum Association asserts that the U.S. market remains highly price

---

[54] *Original Determination*, USITC Pub. 4861 at 19.
[55] *Original Determination*, USITC Pub. 4861 at 19.
[56] *Original Determination*, USITC Pub. 4861 at 19.
[57] CR/PR at Table I-8.
[58] CR/PR at Table I-8.
[59] CR/PR at I-17.
[60] CR/PR at Table I-8.
[61] CR/PR at Table I-8.
[62] CR/PR at Table I-8.
[63] CR/PR at Table I-7.
[64] *Original Determination*, USITC Pub. 4861 at 19.
[65] *Original Determination*, USITC Pub. 4861 at 20.

sensitive based on the continued, substitutable nature of imported and domestically produced CAAS, with price a very important factor in purchasing decisions.[66] Based on the available information in these expedited reviews, we again find that there is a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price remains important in purchasing decisions.

Effective March 23, 2018, CAAS imported from China became subject to an additional tariff of 10 percent *ad valorem* under Section 232 of the Trade Expansion Act of 1962, as amended ("Section 232").[67] Effective September 1, 2019, CAAS originating in China was subject to an additional 15 percent *ad valorem* duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for CAAS was reduced to 7.5 percent.[68]

C. Likely Volume of Subject Imports

1. Original Investigations

In the original investigations, the Commission found that subject imports had a significant and increasing presence in the U.S. market during the POI and captured market share directly at the domestic industry's expense.[69] The volume of subject imports increased from 296,495 short tons in 2015 to 303,720 short tons in 2016 and 390,905 short tons in 2017.[70] Subject imports' share of apparent U.S. consumption was 14.7 percent in 2015 and 2016 and increased to 17.9 percent in 2017.[71] The Commission noted that subject imports' market share increased by 3.2 percentage points from 2016 to 2017 while the domestic industry's market share declined by 5.1 percentage points.[72]

[66] Aluminum Association's NOI Response at 13.
[67] CR/PR at I-8 & n.15.
[68] CR/PR at I-9 & n.17.
[69] *Original Determination*, USITC Pub. 4861 at 22.
[70] *Original Determination*, USITC Pub. 4861 at 22.
[71] *Original Determination*, USITC Pub. 4861 at 22.
[72] *Original Determination*, USITC Pub. 4861 at 22.

2. Current Reviews

Subject imports remained in the U.S. market during the POR, but at much lower volumes than during the original investigation period given the disciplining effect of the orders.[73] Subject imports from China were 166,571 short tons in 2018, 50,827 short tons in 2019, 49,923 short tons in 2020, 76,853 short tons in 2021, 87,537 short tons in 2022, and 30,528 short tons in 2023.[74]

The record in these five-year reviews contains limited information on the CAAS industry in China. The available information indicates that subject producers have the means to export significant volumes of subject merchandise to the U.S. market if the orders were revoked.

The information available, including that submitted by the Aluminum Association, indicates that the subject industry possessed substantial capacity during the POR. According to information submitted by the Aluminum Association, there are more than 200 possible producers of CAAS in China,[75] and Chinese capacity to produce aluminum cold-rolled sheet and plate products, which includes CAAS, was *** million short tons in 2017 and *** million short tons in 2023.[76] Meanwhile, capacity utilization was *** percent in 2023.[77] A number of Chinese producers produced substantial volumes of CAAS in 2023. Henan Mingtai AI Industrial Co., Ltd. produced *** short tons of CAAS in 2023.[78] Luoyang Xinlong Aluminum Co., Ltd. produced *** short tons of CAAS in 2023 and reportedly has annual capacity to produce 500,000 tons.[79] Shandong Creative Sheet Materials Co., Ltd. produced *** short tons of CAAS in 2023 and reportedly has annual capacity to produce 400,000 tons.[80] Henan Yongtong Aluminum Co., Ltd. produced *** short tons in 2023 and reportedly has annual capacity to produce 650,000 tons.[81]

The information available also indicates that the Chinese industry is increasing capacity. It has approximately 25 aluminum plate, sheet, strip, and foil projects under construction with a total combined production capacity of 4.44 million short tons; these projects are expected to be

---

[73] CR/PR at Table I-7.

[74] CR/PR at Table I-7.

[75] CR/PR at I-25.

[76] Aluminum Association NOI Response at 7 and Exhibit 3. These data also contain a small amount of out-of-scope products and, thus, may be overstated.

[77] Aluminum Association NOI Response at 7 and Exhibit 3.

[78] Aluminum Association NOI Response at 8 and Exhibit 3. We note that Mingtai's website only reports annual production capacity of 400,000 metric tons, or 440,925 short tons. *Id.* at Exhibit 3.

[79] Aluminum Association NOI Response at 8 and Exhibit 4. The company's website does not specify whether the reported capacity is in metric or short tons.

[80] Aluminum Association NOI Response at 8 and Exhibit 4. The company's website does not specify whether the reported capacity is in metric or short tons.

[81] Aluminum Association NOI Response at 8 and Exhibit 4. The company's website does not specify whether the reported capacity is in metric or short tons.

on line by 2025.[82] Henan Mingtai AI Industrial Co., Ltd. announced plans to construct a new facility to produce CAAS and other products.[83] Novelis announced a $375 million investment to expand rolling and recycling capacity to be completed by mid-2024 and Shandong Nanshan Aluminum Co., Ltd. announced plans to add a new cold rolling mill with an annual capacity of 198,416 short tons.[84]

The information available also indicates that the subject industry remains a large exporter. Global Trade Atlas ("GTA") data covering Chinese exports of merchandise under Harmonized Schedule ("HS") subheadings 7606.11, 7606.12, 7606.91, and 7606.92, which also include out-of-scope products, show that China was the world's largest exporter of such merchandise in 2022.[85] Those data also show that such exports increased by 27.8 percent from 2018 to 2022, from 3.08 million short tons to 3.94 million short tons.[86]

The information available further indicates that the U.S. market remains attractive to subject producers. Subject imports maintained a presence in the U.S. market throughout the POR, accounting for 1.7 percent of apparent U.S. consumption in 2023,[87] reflecting both continued interest in the U.S. market on the part of subject producers and ready distribution networks in the United States that would enable them to quickly re-enter the U.S. market for CAAS after revocation. According to GTA data, the United States was the fifth largest destination market for Chinese exports of merchandise under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92 in 2023, and the nearby Mexican and Canadian markets were the largest and fourth largest destinations, respectively.[88] [89] Finally, several countries maintain antidumping duties on CAAS from China,[90] which makes it more likely that subject producers will re-direct shipments to the United States in the event of revocation.[91]

---

[82] CR/PR at I-25.

[83] Aluminum Association NOI Response at 8 and Exhibit 3.

[84] CR/PR at Table I-9.

[85] CR/PR at Table I-12. GTA data for 2023 are not used here due to incomplete reporting. *Id.* at Note.

[86] CR/PR at Table I-12; *see also* Aluminum Association's NOI Response at 9, Ex. 5 (submitting Trade Data Monitor data showing similar data and trends).

[87] CR/PR at Table I-8.

[88] CR/PR at Table I-10. As noted, the HS subheadings include out-of-scope products and, thus, may be overstated. China's exports to Mexico increased from 176,138 short tons in 2018 to 403,018 short tons in 2023, and China's exports to Canada increased from 119,551 short tons in 2018 to 172,698 short tons in 2023. *Id.*

[89] Aluminum Association's NOI Response at 9.

[90] CR/PR at Table I-11.

[91] Aluminum Association's NOI Response at 10-11.

Given the foregoing, including the significant volume and market share of subject imports during the original investigations, the continued presence of subject imports in the U.S. market during the POR (indicating the attractiveness of the US. market), the Chinese industry's substantial and increasing capacity, including excess capacity, and its large volume of exports, we find that the volume of subject imports from China would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.[92]

D. Likely Price Effects

1. Original Investigations

In the original investigations, the Commission found that subject imports were having a significant adverse effect on U.S. prices.[93] The Commission found a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price was an important factor in purchasing decisions.[94] The Commission found significant underselling by the subject imports over the POI given their predominant underselling of the domestic like product, on a quarterly and volume basis, a substantial number of lost sales, and a resulting market share shift.[95]

The Commission also observed that the domestic industry's price increases were not commensurate with rising costs.[96] The domestic industry's ratio of COGS to net sales increased by 3.0 percentage points from 2016 to 2017 as unit COGS increased more rapidly than the average unit value ("AUV") for net sales; in 2017, subject imports reached their peak volume while

---

[92] Although subject imports from China are currently subject to additional duties under sections 232 and 301, neither the Aluminum Association nor the responding purchaser indicated that the Section 232 and 301 duties would prevent subject imports from entering the U.S. market at significant levels if the orders were revoked. *See generally* Aluminum Association's NOI Response; CR/PR at D-3. Given the Chinese industry's large size and export orientation, and the attractiveness of the U.S. market, we find that the Section 232 and 301 duties would not likely prevent subject imports from increasing to significant levels if the orders were revoked.

The record of these five-year reviews does not contain information concerning product shifting or inventories of subject merchandise.

[93] *Original Determination*, USITC Pub. 4861 at 26.

[94] *Original Determination*, USITC Pub. 4861 at 23.

[95] *Original Determination*, USITC Pub. 4861 at 23-24. Subject imports undersold domestic product in 82 of 98 quarterly comparisons; the volume of subject imports in quarters with underselling was 403.1 million pounds, compared to 55.8 million pounds in quarters with overselling. The Commission also noted that underselling reached its highest level in 2017. *Id.*

[96] *Original Determination*, USITC Pub. 4861 at 25.

continuing to undersell pervasively.[97] Consequently, the Commission found subject imports prevented price increases that would otherwise have occurred to a significant degree.[98]

2. Current Reviews

As discussed in Section III.B.3 above, we have found that there is a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price remains important in purchasing decisions.

The record in these expedited reviews does not contain recent product-specific pricing information. Given that subject imports and the domestic like product are moderately to highly substitutable and that price is an important factor in purchasing decisions, we find that the likely significant volume of subject imports would likely undersell the domestic like product to a significant degree, as during the original investigations, as a means of gaining market share.[99] Absent the discipline of the order, the likely significant volume of low-priced subject imports would force the domestic industry to lower prices or forgo needed price increases, or else lose sales and market share to subject imports. Consequently, we find that subject imports would likely have significant price effects on the domestic like product if the orders were revoked.

E. Likely Impact

1. Original Investigations

In the original investigations, the Commission found that the domestic industry's financial performance, which was weak throughout the full years of the POI, sharply deteriorated towards the end of the POI when low-priced subject imports peaked and suppressed the domestic industry's prices for CAAS.[100] Although the Commission recognized that most of the domestic industry's performance indicators improved in interim 2018, those improvements coincided with declines in subject import volumes and increases in prices following the initiation of the investigations and the imposition of Section 232 tariffs.[101] Based on the foregoing, the

---

[97] *Original Determination*, USITC Pub. 4861 at 25.

[98] *Original Determination*, USITC Pub. 4861 at 26.

[99] The Aluminum Association argues the U.S. market for CAAS remains highly price sensitive and available pricing data show subject imports continue to sell at unit values below those of the U.S. industry. Aluminum Association's NOI Response at 13. The AUV of subject imports was $4,151 per ton in 2023; U.S. producers' was $4,702 per ton. CR/PR at Tables I-6 and I-7.

[100] *Original Determination*, USITC Pub. 4861 at 29.

[101] *Original Determination*, USITC Pub. 4861 at 30.

Commission concluded that subject imports had a significant impact on the domestic industry.[102]

The Commission considered and rejected respondents' arguments regarding allegations of insufficient domestic supply and attenuated competition.[103] It also examined the role of nonsubject imports and found they could not explain the industry's lost sales, market share losses, and declines in financial performance.[104]

2. Current Reviews[105]

The record in these five-year reviews contains limited information concerning the domestic industry's performance since the original investigations.

The information available indicates that the domestic industry's trade and financial performance was generally stronger in 2023 as compared to its performance in the last years of the period examined in the original investigations.[106] The domestic industry's capacity, at 2.0 million short tons, and production, at 1.4 million short tons, were higher in 2023 than during the original investigations, while its capacity utilization, at 70.8 percent, was lower.[107]

The AUV of the domestic industry's U.S. shipments was higher in 2023, at $4,702 per short ton, than during the original investigations.[108] The quantity of the domestic industry's U.S. shipments of CAAS, at 1.3 million short tons, and share of apparent U.S. consumption, at 71.7 percent, were both higher than during the original investigations.[109] The value of the domestic industry's U.S. shipments was higher, at $6.2 billion, than during the original investigations.[110]

The domestic industry's net sales value, at $6.4 billion, gross profit, at $808.9 million,

---

[102] *Original Determination*, USITC Pub. 4861 at 30.

[103] *Original Determination*, USITC Pub. 4861 at 30-31.

[104] *Original Determination*, USITC Pub. 4861 at 32.

[105] In its expedited review of the antidumping duty order, Commerce determined that revocation of the order would result in the continuation or recurrence of dumping, with margins of up to 59.72 percent. *Common Alloy Aluminum Sheet from the People's Republic of China: Final Results of the Expedited First Sunset Review of Antidumping Duty Order*, 89 Fed. Reg. 38096 (May 7, 2024).

[106] CR/PR at Table I-6.

[107] CR/PR at Table I-6. The domestic industry's capacity was 1.7 million short tons in 2015 and 2016, and 1.6 million short tons in 2017. *Id.* The domestic industry's production was 1.3 million short tons in 2015, 1.4 million short tons in 2016, and 1.3 million short tons in 2017. *Id.* The domestic industry's capacity utilization was 78.9 percent in 2015, 81.1 percent in 2016, and 81.3 percent in 2017. *Id.*

[108] CR/PR at Table I-6. U.S. producers' U.S. shipment AUV was $2,692 per short ton in 2015, $2,510 per short ton in 2016, and $2,896 per short ton in 2017. *Id.*

[109] CR/PR at Table I-8. The domestic industry's U.S. shipments were 1.2 million short tons in 2015, 2016, and 2017. *Id.* The domestic industry's share of apparent U.S. consumption was 59.9 percent in 2015, 59.6 percent in 2016, and 54.5 percent in 2017. *Id.*

[110] CR/PR at Table I-8. The value of the domestic industry's U.S. shipments was $3.3 billion in 2015, $3.1 billion in 2016, and $3.5 billion in 2017.

operating income, at $603.2 million, and operating income to net sales ratio, at 9.4 percent, were all higher in 2023 than during the original investigations.[111] The domestic industry's COGS to net sales ratio, at 87.3 percent, was lower than during the original investigations.[112] The limited available information is insufficient for us to make a finding as to whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available on the record, we find that revocation of the order would likely result in a significant volume of subject imports that likely would undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or depress or suppress domestic prices to a significant degree. The likely significant volume of low-priced subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. We thus conclude that, if the orders were revoked, subject imports from China would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Nonsubject imports have decreased their presence in the U.S. market since the original investigation period, accounting for 26.6 percent of apparent U.S. consumption in 2023 as compared to 27.6 percent in 2017, the terminal year of the original POI.[113] The record provides no indication that the presence of nonsubject imports would prevent subject imports from China from significantly increasing their presence in the U.S. market after revocation. In light of the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, it is likely that the

---

[111] CR/PR at Table I-6. The domestic industry's net sales value was $3.7 billion in 2015, $3.4 billion in 2016, and $3.8 billion in 2017. *Id.* The domestic industry's gross profit was $243.8 million in 2015, $306.9 million in 2016, and $230.0 million in 2017. *Id.* The domestic industry reported an operating income of $65.3 million in 2015, $98.2 million in 2016, and $25.6 million in 2017. *Id.* The domestic industry's operating income to net sales ratio was 1.8 percent in 2015, 2.9 percent in 2016, and 0.7 percent in 2017. *Id.*

[112] CR/PR at Table I-6. The domestic industry's COGS to net sales ratio was 93.4 percent in 2015, 91.0 percent in 2016, and 94.0 percent in 2017. *Id.*

[113] CR/PR at Table I-8.

increase in low-priced subject imports would come at least in part at the expense of the domestic industry and/or depress or suppress prices for the domestic like product. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

We recognize that apparent U.S. consumption of CAAS was 15.4 percent lower in 2023 than in 2017, the last year of the original POI.[114] The Aluminum Association stated that demand decreased from 2020 to 2021 as the result of COVID-19 but has generally increased from 2021 to 2023.[115] Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volume of low-priced subject imports that is likely after revocation would exacerbate any effects of slowing demand on the domestic industry, by further reducing the industry's sales and placing additional downward pressure on domestic prices. Given these considerations, we find that the likely effects attributable to subject imports are distinguishable from any likely effects of reduced demand if the orders were revoked.

IV. Conclusion

For the foregoing reasons, we determine that revocation of the antidumping and countervailing duty orders on CAAS from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

[114] Calculated from CR/PR at Table I-8.

[115] Aluminum Association NOI Response at 20.

Information obtained in these reviews

Background

On January 2, 2024, the U.S. International Trade Commission ("Commission") gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("the Act"),[1] that it had instituted reviews to determine whether revocation of the antidumping and countervailing duty orders on common alloy aluminum sheet ("CAAS") from China would likely lead to the continuation or recurrence of material injury to a domestic industry.[2] All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.[3] [4] Table I-1 presents information relating to the background and schedule of this proceeding:

Table I-1
CAAS: Information relating to the background and schedule of this proceeding

Effective date	Action
January 2, 2024	Notice of initiation by Commerce (89 FR 66, January 2, 2024)
January 2, 2024	Notice of institution by Commission (89 FR 96, January 2, 2024)
April 8, 2024	Commission's vote on adequacy
May 7, 2024	Commerce's results of its expedited reviews
August 23, 2024	Commission's determinations and views

[1] 19 U.S.C. 1675(c).

[2] 89 FR 96, January 2, 2024. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 89 FR 66, January 2, 2024. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

[3] As part of their response to the notice of institution, interested parties were requested to provide company-specific information. That information is presented in app. B. Summary data compiled in the original investigations are presented in app. C.

[4] Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

Responses to the Commission's notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of the Aluminum Association Common Alloy Aluminum Sheet Trade Enforcement Working Group and its individual members (collectively referred to herein as "domestic interested parties").[5]

A complete response to the Commission's notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table I-2.

Table I-2
CAAS: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage
U.S. producer	7	91.4%
U.S. business association	1	91.4%

Note: The U.S. business association consists of the seven U.S. producers presented. The coverage figures presented for the U.S. business association and U.S. producers are the domestic interested parties' estimates of their share of total U.S. production of CAAS during 2023. Domestic interested parties' response to the notice of institution, February 1, 2024, p. 18.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on CAAS.[6]

[5] The Aluminum Association Common Alloy Aluminum Sheet Trade Enforcement Working Group consists of the following individual members that produce the domestic like product in the United States: Arconic Corporation ("Arconic"), Commonwealth Rolled Products, Inc. ("Commonwealth Rolled Products"), Constellium Rolled Products Ravenswood, LLC ("Constellium Rolled Products"), Jupiter Aluminum Corporation ("Jupiter Aluminum"), JW Aluminum Company ("JW Aluminum"), Novelis Corporation ("Novelis"), and Texarkana Aluminum, Inc. ("Texarkana Aluminum").

[6] Domestic interested parties' comments on adequacy, March 11, 2024, p. 2.

The original investigations

The original investigations resulted from a notification of investigations self-initiated by Commerce and deemed by the Commission as having been filed on December 1, 2017.[7] On November 15, 2018, Commerce determined that imports of CAAS from China were being sold at less than fair value ("LTFV") and subsidized by the Government of China.[8] The Commission determined on January 30, 2019 that the domestic industry was materially injured by reason of LTFV and subsidized imports of CAAS from China.[9] On February 6, 2019, Commerce issued its countervailing duty order with net subsidy rates ranging from 46.48 to 116.49 percent and on February 8, 2019, Commerce issued its antidumping duty order with final weighted-average dumping margins ranging from 49.85 to 59.72 percent.[10]

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on CAAS and other aluminum merchandise, as presented in table I-3.

[7] Common Alloy Aluminum Sheet from China, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final), USITC Publication 4861, January 2019 ("Original publication"), p. I-1.

[8] 83 FR 57421, 83 FR 57427, November 15, 2018.

[9] 84 FR 1784, February 5, 2019.

[10] 84 FR 2157, February 6, 2019; 84 FR 2813, February 8, 2019.

Table I-3
CAAS: Previous and related Commission proceedings and current status

Date	Product	Number	Country	ITC original determination	Current status
2003	Aluminum plate	731-TA-1056	South Africa	Negative	---
2010	Aluminum extrusions	701-TA-475	China	Affirmative	Order continued after 2nd review, 11/02/2022
2010	Aluminum extrusions	731-TA-1177	China	Affirmative	Order continued after 2nd review, 11/02/2022
2016	Primary unwrought aluminum	TA-201-74	---	---	Petition withdrawn
2017	Aluminum foil	701-TA-570	China	Affirmative	Order continued after 1st review, 09/22/2023
2017	Aluminum foil	731-TA-1346	China	Affirmative	Order continued after 1st review, 09/22/2023
2020	CAAS	701-TA-639	Bahrain	Affirmative	Order in effect
2020	CAAS	701-TA-640	Brazil	Terminated	Terminated after Commerce negative determination
2020	CAAS	701-TA-641	India	Affirmative	Order in effect
2020	CAAS	701-TA-642	Turkey	Affirmative	Order in effect
2020	CAAS	731-TA-1475	Bahrain	Affirmative	Order in effect
2020	CAAS	731-TA-1476	Brazil	Affirmative	Order in effect
2020	CAAS	731-TA-1477	Croatia	Affirmative	Order in effect
2020	CAAS	731-TA-1478	Egypt	Affirmative	Order in effect
2020	CAAS	731-TA-1479	Germany	Affirmative	Order in effect
2020	CAAS	731-TA-1480	Greece	Terminated	Terminated after Commerce negative determination
2020	CAAS	731-TA-1481	India	Affirmative	Order in effect
2020	CAAS	731-TA-1482	Indonesia	Affirmative	Order in effect
2020	CAAS	731-TA-1483	Italy	Affirmative	Order in effect
2020	CAAS	731-TA-1484	South Korea	Terminated	Terminated after Commerce negative determination
2020	CAAS	731-TA-1485	Oman	Affirmative	Order in effect
2020	CAAS	731-TA-1486	Romania	Affirmative	Order in effect
2020	CAAS	731-TA-1487	Serbia	Affirmative	Order in effect
2020	CAAS	731-TA-1488	Slovenia	Affirmative	Order in effect
2020	CAAS	731-TA-1489	South Africa	Affirmative	Order in effect

Table continued.

Table I-3 Continued
CAAS: Previous and related Commission proceedings and current status

Date	Product	Number	Country	ITC original determination	Current status
2020	CAAS	731-TA-1490	Spain	Affirmative	Order in effect
2020	CAAS	731-TA-1491	Taiwan	Affirmative	Order in effect
2020	CAAS	731-TA-1492	Turkey	Affirmative	Order in effect
2020	Aluminum foil	701-TA-658	Oman	Affirmative	Order in effect
2020	Aluminum foil	701-TA-659	Turkey	Affirmative	Order in effect
2020	Aluminum foil	731-TA-1538	Armenia	Affirmative	Order in effect
2020	Aluminum foil	731-TA-1539	Brazil	Affirmative	Order in effect
2020	Aluminum foil	731-TA-1540	Oman	Affirmative	Order in effect
2020	Aluminum foil	731-TA-1541	Russia	Affirmative	Order in effect
2020	Aluminum foil	731-TA-1542	Turkey	Affirmative	Order in effect
2023	Aluminum extrusions	701-TA-695	China	Pending	Pending
2023	Aluminum extrusions	701-TA-696	Indonesia	Pending	Pending
2023	Aluminum extrusions	701-TA-697	Mexico	Pending	Pending
2023	Aluminum extrusions	701-TA-698	Turkey	Pending	Pending
2023	Aluminum extrusions	731-TA-1643	China	Pending	Pending
2023	Aluminum extrusions	731-TA-1644	Colombia	Pending	Pending
2023	Aluminum extrusions	731-TA-1645	Dominican Republic	Pending	Pending
2023	Aluminum extrusions	731-TA-1646	Ecuador	Pending	Pending
2023	Aluminum extrusions	731-TA-1647	India	Pending	Pending
2023	Aluminum extrusions	731-TA-1648	Indonesia	Pending	Pending
2023	Aluminum extrusions	731-TA-1649	Italy	Pending	Pending
2023	Aluminum extrusions	731-TA-1650	Malaysia	Pending	Pending
2023	Aluminum extrusions	731-TA-1651	Mexico	Pending	Pending
2023	Aluminum extrusions	731-TA-1652	South Korea	Pending	Pending
2023	Aluminum extrusions	731-TA-1653	Taiwan	Pending	Pending
2023	Aluminum extrusions	731-TA-1654	Thailand	Pending	Pending
2023	Aluminum extrusions	731-TA-1655	Turkey	Pending	Pending
2023	Aluminum extrusions	731-TA-1656	United Arab Emirates	Pending	Pending
2023	Aluminum extrusions	731-TA-1657	Vietnam	Pending	Pending

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: “Date” refers to the year in which the investigation was instituted by the Commission.

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of CAAS from China with the intent of issuing the final results of these reviews based on the facts available not later than May 1, 2024.[11] Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at https://access.trade.gov/public/FRNoticesListLayout.aspx and subsequently on the Commission's Electronic Document Information System (EDIS). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of CAAS from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

> *The merchandise covered by this order is aluminum common alloy sheet (common alloy sheet), which is a flat-rolled aluminum product having a thickness of 6.3 mm or less, but greater than 0.2 mm, in coils or cut-to-length, regardless of width. Common alloy sheet within the scope of this order includes both not clad aluminum sheet, as well as multi-alloy, clad aluminum sheet. With respect to not clad aluminum sheet, common alloy sheet is manufactured from a 1XXX-, 3XXX-, or 5XXX-series alloy as designated by the Aluminum Association. With respect to multi-alloy, clad aluminum sheet, common alloy sheet is produced from a 3XXX-series core, to which cladding layers are applied to either one or both sides of the core.*

[11] Letter from Jill E. Pollack, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, February 22, 2024.

Common alloy sheet may be made to ASTM specification B209–14, but can also be made to other specifications. Regardless of specification, however, all common alloy sheet meeting the scope description is included in the scope. Subject merchandise includes common alloy sheet that has been further processed in a third country, including but not limited to annealing, tempering, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of this order is aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans. Aluminum can stock is produced to gauges that range from 0.200 mm to 0.292 mm, and has an H–19, H–41, H–48, or H–391 temper. In addition, aluminum can stock has a lubricant applied to the flat surfaces of the can stock to facilitate its movement through machines used in the manufacture of beverage cans. Aluminum can stock is properly classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7606.12.3045 and 7606.12.3055.

Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set for the above.[12]

U.S. tariff treatment

CAAS is currently imported under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3095, 7606.91.6095, 7606.92.3035, and

[12] 84 FR 2157, February 6, 2019; 84 FR 2813, February 8, 2019.

7606.92.6095.[13] The general rate of duty is 3 percent ad valorem for HTS subheadings 7606.11.30, 7606.12.30, 7606.91.30 and 7606.92.30, 2.7 percent ad valorem for HTS subheadings 7606.11.60 and 7606.91.60, and 6.5 percent ad valorem for HTS subheadings 7606.12.60 and 7606.92.60.[14] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective March 23, 2018, CAAS originating in China is subject to an additional 10 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.[15] [16]

[13] For the purposes of assessing global and Chinese export data, this report also references trade data recorded under the 6-digit Harmonized System ("HS"). In the original investigations, CAAS was imported under HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. Effective July 2019, HTS statistical reporting numbers 7606.91.3090 and 7606.91.3075 were discontinued and HTS statistical reporting number 7606.91.3095 was established, consolidating products imported under the previous numbers. In a similar manner, and also effective July 2019, HTS statistical reporting numbers 7606.91.6080 and 7606.91.6060 were discontinued and replaced with 7606.91.6095, HTS statistical reporting numbers 7606.92.3090 and 7602.92.3075 were discontinued and replaced with 7606.92.3035, and HTS statistical reporting numbers 7606.92.6080 and 7606.92.6060 were discontinued and replaced with 7606.92.6095. Discontinued statistical reporting numbers 7606.91.3075, 7606.91.6060, 7606.92.3075, and 7606.92.6060 included out-of-scope products in circle and disk shapes. The newly established statistical reporting numbers consolidate products in circle and disk shapes (out-of-scope) with products in other shapes (in-scope). Thus, it is possible that the newly established statistical reporting numbers under which CAAS is currently imported include some product that is not covered by Commerce's scope in these reviews. Effective January 2020, HTS statistical reporting number 7606.12.3090 was discontinued and replaced with the newly established HTS statistical reporting numbers 7606.12.3091 and 7606.12.3096, which break out products made from heat-treatable alloys and other alloys. HTS Change Record 2019, USITC, HTS (2019) Basic Edition, USITC Publication 4862, January 2019, pp. 76-6 – 76-7.

[14] USITC, HTS (2024) Revision 1, USITC Publication 5491, January 2023, pp. 76-6 – 76.7.

[15] 86 FR 11619, March 15, 2018. See also HTS heading 9903.85.01 and U.S. notes 19(a) and 19(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 1, USITC Publication 5491, January 2023, pp. 99-III-23–99-III-26, 99-III-293.

[16] Section 232 import duties on aluminum articles currently cover all countries of origin except Argentina, Australia, Canada, and Mexico. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on aluminum articles, while imports from Argentina are exempt from duties but are instead subject to absolute quotas. European Union ("EU") member countries (effective January 1, 2022) and the United Kingdom (effective June 1, 2022) are currently subject to tariff-rate quotas ("TRQs") for aluminum articles, and imports that exceed the TRQ limits are subject to the section 232 tariffs. Effective March 10, 2023, section 232 duties on aluminum articles from Russia were increased to 200 percent ad valorem. 83 FR 11619, March 15, 2018; 83 FR 13355, March 28, 2018; 83 FR 25849, June 5, 2018; 84 FR 23983, May 23, 2019; 85 FR 68709, October 27, 2020; 87 FR 1, January 3, 2022; 87 FR 33583, June 3, 2022; 88 FR 13267, March 2, 2023.

Effective September 1, 2019, CAAS originating in China was subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for CAAS was reduced to 7.5 percent.[17]

Description and uses[18]

Aluminum sheet is a flat, thin, wrought[19] aluminum product that is produced via a rolling process. The subject product is common alloy aluminum sheet having a thickness of 6.3 mm or less, but greater than 0.2 mm, in coils or cut-to-length, regardless of width.[20] Aluminum sheet within Commerce's scope includes both not-clad and multi-alloy clad aluminum sheet.

Not-clad aluminum alloy sheet is derived from molten aluminum that is mixed with other nonferrous alloying metals,[21] and then cast into a semifinished form for further processing.

Multi-alloy clad aluminum sheet is produced through a roll bonding process, during which aluminum sheet and other nonferrous metal (alloying metals) sheets are passed concurrently through steel rollers that bind the metals together through the application of pressure. Multi-alloy clad aluminum sheet is produced from a 3XXX series alloy core, to which layers are applied to one or both sides of the core. This process increases the strength of the final product and holds it together.

Table I-4 presents information on common alloy series, type of alloying metals, properties of those alloys, and the end uses of those alloys. Alloys are added to aluminum for the purpose of increasing corrosion resistance, hardness, or strength. Commerce's scope includes 1XXX, 3XXX, and 5XXX series alloys, all of which are non-heat-treatable, but does not include 6XXX series alloys, which are heat-treatable.

[17] 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 1, USITC Publication 5491, January 2023, pp. 76.6 – 76.7.

[18] Unless otherwise noted, this information is based on the original publication, pp. I-12-I-14.

[19] Wrought aluminum consists of aluminum products that are rolled, drawn, extruded, or otherwise mechanically formed.

[20] Other flat-rolled, wrought aluminum products that are not included within the scope of these reviews include aluminum foil (which has a thickness no greater than 0.2 mm) and aluminum plate (which has a thickness greater than 6.3 mm).

[21] Alloying metals are metallic elements added during the melting of aluminum for the purpose of increasing corrosion resistance, hardness, or strength.

Table I-4
Aluminum alloys: Alloy series, alloying metal, properties, and end uses

Series	Alloying metal	Properties	End uses
1XXX	Pure aluminum (Al)	Commercially pure (99 percent or more Al by weight), non-heat-treatable, low strength, excellent formability, high thermal and electrical conductivity, high corrosion resistance, highly reflective	Aircraft frames, fuel filters, electric power grid lines, radiator tubing, lighting reflectors, decorative components, food packaging trays
3XXX	Manganese (Mn)	Non-heat-treatable, medium strength, good formability, good corrosion resistance	Storage tanks, beverage cans, home appliances, heat exchangers, pressure vessels, siding, gutters
5XXX	Magnesium (Mg)	Non-heat-treatable, medium to high strength, good formability, excellent marine corrosion resistance	Interior automotive, appliance trim, pressure vessels, armor plate, marine and cryogenic components
6XXX	Magnesium (Mg) and silicon (Si)	Heat-treatable, medium-high strength, good corrosion resistance, easily extruded	Exterior automotive, automotive profiles, railcars, tubing, marine vessel frames, screw stock, doors and windows

Note: While 1XXX, 3XXX, and 5XXX alloy series are included in Commerce's scope, the end uses described above may be produced from product that is out of scope (e.g., due to thickness) or excluded from the scope (e.g., can stock). 6XXX series alloys are not included in Commerce's scope. 4XXX and 7XXX series alloys also exist but are less common.

Source: Aluminum Association, "Aluminum Alloys 101," https://www.aluminum.org/sites/default/files/2021-09/AA-Infographic-Alloys-v5_0.jpg, retrieved February 25, 2024; ASM International, "Subject Guide: Aluminum and Aluminum Alloys," https://www.asminternational.org/aluminum-and-aluminum-alloys-subject-guide/, retrieved February 25, 2024; Aluminum: Competitive Conditions Affecting the U.S. Industry, Inv. No. 332-557, USITC Publication 4703, June 2017, pp. 530-531.

CAAS can be produced to the requirements of various international standard specifications, including but not limited to the American Society for Testing and Materials ("ASTM") International Standard B209-14 for aluminum and aluminum alloy sheet and plate.[22]

The scope of these reviews excludes "aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans." Can stock is produced to gauges ranging from 0.200 mm to 0.292 mm with any of the following tempers: H-19, H-41, H-48, or H-39.[23] Aluminum can stock also has a lubricant applied to its

[22] ASTM International, "ASTM B209-14,"https://www.astm.org/Standards/B209.htm, retrieved February 25, 2024.

[23] In metallurgy, tempering is a heat treating process that is used to strengthen or harden metal. The Aluminum Association identifies various aluminum products by specifying both an alloy and a temper for that product. H tempers indicate the degree of strain-hardening for that product.

surfaces in order to facilitate movement through equipment used to manufacture beverage cans.

Manufacturing process[24]

The manufacturing processes for CAAS are summarized below. In general, there are three distinct stages that include: (1) smelting and refining or remelting of scrap, (2) casting[25] aluminum into semi-finished forms such as sheet ingot,[26] and (3) rolling semi-finished forms into flat-rolled products such as aluminum sheet.

Melting and refining

Aluminum is produced using either the primary smelting process or the secondary remelting process.

Primary smelting

Inputs for the primary smelting process are derived from aluminum-containing ore (i.e., bauxite) that is first mined then refined into aluminum-oxide (i.e., alumina) through a chemical reaction known as the Bayer process.[27] The alumina is then electrolytically smelted to remove oxygen and produce molten aluminum metal (i.e., the Hall-Héroult process).[28] This process requires significant amounts of electricity. The molten aluminum produced through the smelting process is then alloyed with other nonferrous metals to enhance certain properties and characteristics. Aluminum can also be alloyed with other nonferrous metals later in the manufacturing process through a cladding process (described later in this section).

[24] Unless otherwise noted, this information is based on the original publication, pp. I-14-I-18.

[25] The two casting methods used in the production of aluminum sheet include continuous and direct chill casting.

[26] Sheet ingot is a large unwrought slab of aluminum that can weigh more than 20 metric tons and is approximately 6 feet wide, 20 feet long, and more than 2 feet thick. Sheet ingot is reduced in thickness to produce flat-rolled products such as sheet, plate, and foil.

[27] During the Bayer process, bauxite is crushed, washed, dried, and dissolved with caustic soda. The remaining mixture is then filtered to remove impurities and then transferred to a precipitator tank where it is chemically reduced into alumina. For more information see The Aluminum Association, "Alumina Refining 101," https://www.aluminum.org/alumina-refining-101, retrieved February 25, 2024.

[28] For more information on the Hall-Héroult process, see The Aluminum Association, "Primary Production 101," https://www.aluminum.org/primary-production-101, retrieved February 25, 2024.

Remelting of scrap

Instead of the primary smelting process, aluminum can also be produced by melting down aluminum scrap metal. This material is called secondary aluminum. Secondary producers purchase large volumes of aluminum scrap, melt it down, and alloy it with primary aluminum and other metals in order to adjust the chemical composition. Most U.S. secondary aluminum producers rely on a combination of primary aluminum and scrap aluminum and may adjust the amount of primary aluminum they mix in depending on the availability and price of scrap metal relative to primary aluminum, and the desired chemical composition.[29] The desired characteristics of the final end-use product are determined during the melting and refining stages.

Casting

Following the production of molten aluminum with the desired properties, the molten aluminum is cast into a semi-finished form that can enter a rolling process. The most common casting methods used during the production of aluminum sheet include continuous casting and direct chill casting. Direct chill casting requires more energy and entails higher production costs, but produces a higher-quality product when compared to continuous casting.

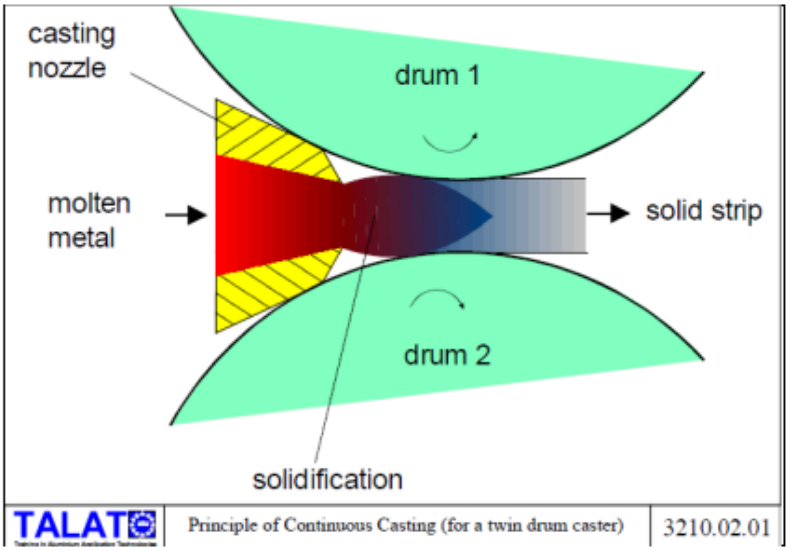
Continuous casting

During the continuous casting process, molten aluminum is transferred to a holding hearth where it is stored at the correct level of purity and temperature until it is ready to be fed into a casting unit. As the molten aluminum is fed into the casting unit, it flows between water-cooled rollers[30] and emerges as a continuous solid strip of aluminum (figure I-1). The strip of aluminum is fed into a combination stand where it is cut into designated lengths by shears before it is wound into a coil (figure I-2). Strips produced during this process can be between 3 and 20 mm (0.11811 and 0.787402 inches) in thickness. The coil is then transferred to a cold rolling mill where, depending on the desired level of thickness, it is then further reduced to produce different gauges of aluminum sheet.

[29] Aluminum: Competitive Conditions Affecting the U.S. Industry, Inv. No. 332-557, USITC Publication 4703, June 2017, pp. 138, 166-167.

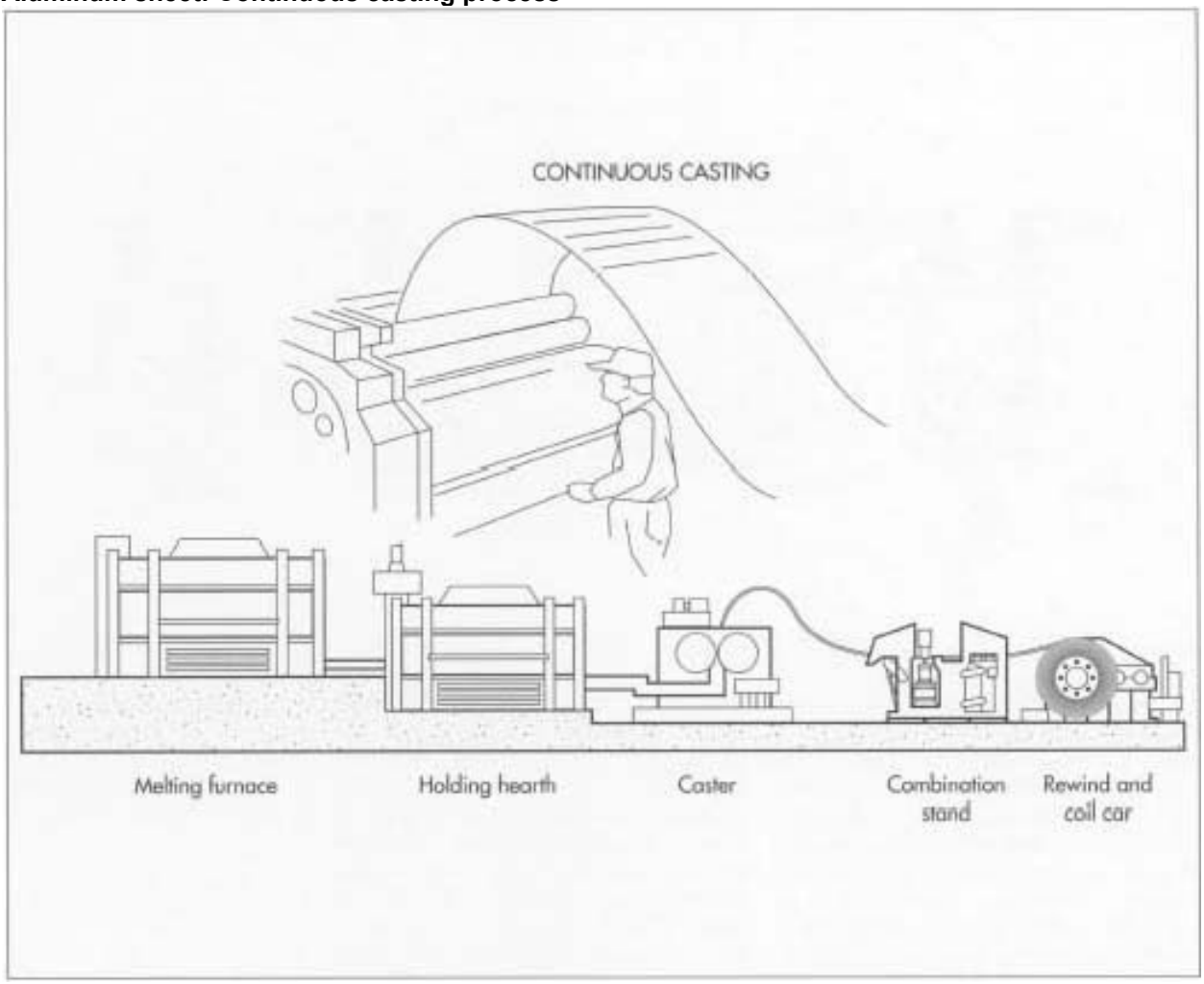
[30] The water-cooled rollers are labeled drum 1 and drum 2 in figure I-1.

Figure I-1
Aluminum sheet: Casting molten aluminum into solid strip (continuous casting process)



Source: Catrin Kammer, European Aluminum Association, “TALAT Lecture 3210, Continuous Casting of Aluminum,” 1999, 4.

Figure I-2
Aluminum sheet: Continuous casting process



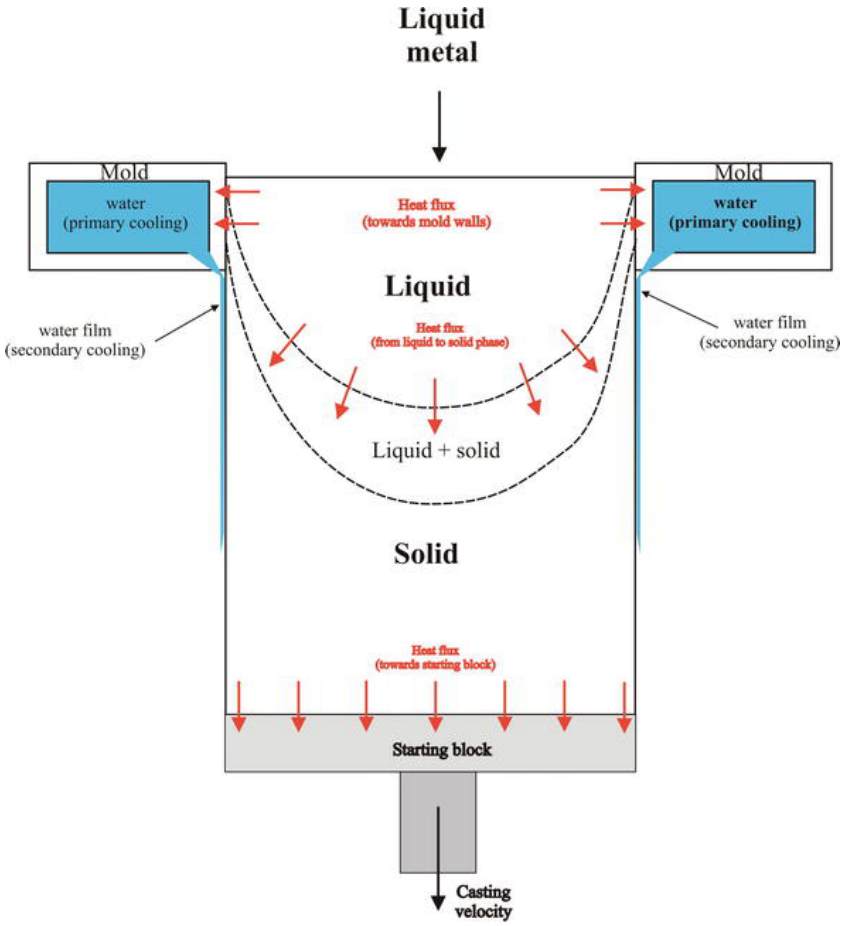
Source: How Products are Made, "Aluminum Foil", https://www.madehow.com/Volume-1/Aluminum-Foil.html, retrieved February 25, 2024.

Direct chill casting

Another method of casting used in the production of CAAS is direct chill casting. During this process, molten aluminum is transferred to a holding hearth where it is stored at the correct level of purity and temperature until it is ready to be fed into a casting unit with a mold. As the molten aluminum flows into in the casting unit, cold water is pumped around the base of the mold. This cools the molten aluminum, solidifying it into the shape of the mold, producing a semi-finished product known as slab or sheet ingot (figure I-3). These semi-finished products

are then removed from the casting unit and undergo a process known as scalping[31] before they are cooled to room temperature and transferred to a hot rolling mill for further processing.

Figure I-3
Aluminum sheet: Direct chill casting



Source: Mendez et. al., "Depicting Aluminum DC Casting by Means of Dimensionless Numbers," December 20, 2017.

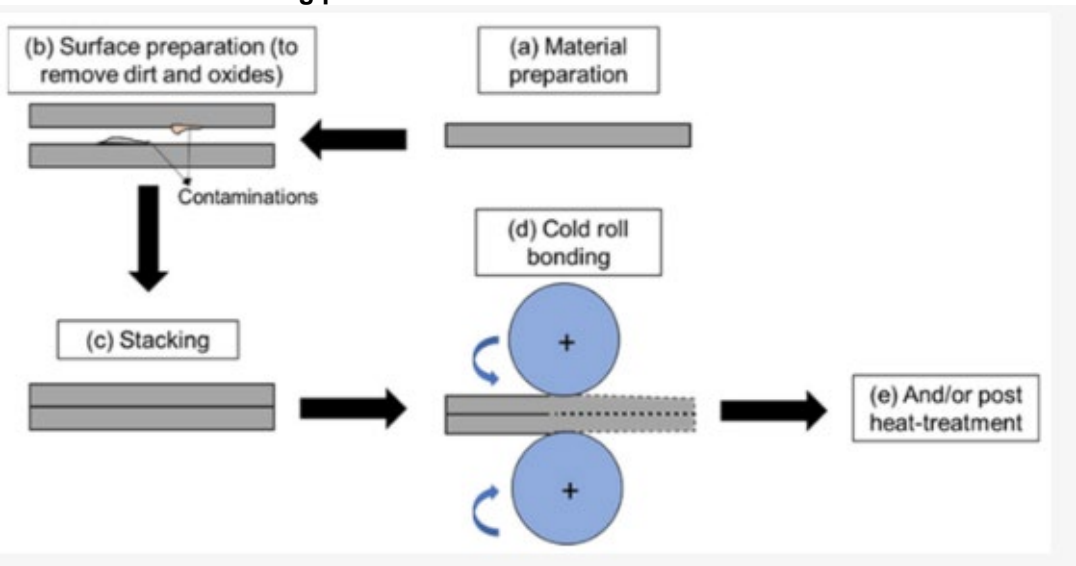
Rolling

Semi-finished forms of aluminum derived from the continuous casting and direct chill casting processes are reduced in thickness in a rolling mill. Hot rolling and cold rolling are two different methods by which semi-finished forms of aluminum are reduced in thickness between rollers. The major differences between these methods are how the input (in coils, slabs, sheet ingot) is treated before it is reduced, and the desired qualities and end uses of the resulting product.

[31] Scalping removes irregularities or undesirable chemical compositions from the surface of the ingot.

Certain product described in Commerce's scope can be alloyed through a cladding process. During this process, clad multi-alloy aluminum sheet is produced through a roll-bonding process, in which sheets of aluminum alloys are bound together through the rolling process. Some manufacturers apply surface treatment to the aluminum and the alloying metal(s) before stacking the sheets together. Once stacked, the sheets are then passed through a series of steel rollers that apply pressure to bond the metals together. The product is then cut and further processed for various end-use applications (figure I-4).[32]

Figure I-4
Clad aluminum sheet: Roll-bonding process



Source: Khan et. al., "Roll Bonding Processes: State-of-the-Art and Future Perspectives," August 2021.

[32] Certain aluminum flat-rolled products such as coils can be further worked through re-rolling the metal. During this process, the metal is passed through steel rollers again in order to reduce it to the desired level of thickness. In addition, depending on the intended end-use application and alloying metal present, certain flat-rolled aluminum products can undergo a heat-treating process known as annealing. However, heat-treated aluminum sheet (e.g., 6XXX alloy series) is not covered by Commerce's scope.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from 10 firms, which accounted for the vast majority of production of CAAS in the United States during 2017.[33]

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of 14 known and currently operating U.S. producers of CAAS.[34] Seven firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately 91.4 percent of production of CAAS in the United States during 2023.[35]

Recent developments

Table I-5 presents events in the U.S. industry since the Commission's original investigations.[36]

Table I-5
CAAS: Developments in the U.S. industry

Item	Firm	Event
Expansion	JW Aluminum	In June 2018, JW Aluminum announced a $300 million expansion of its Goose Creek, South Carolina facility, which is expected to include 220,000 square feet of additional space and 50 new jobs to produce flat-rolled aluminum. The first phase of the expansion was originally expected to be completed in 2020, though several fires (see below) may have resulted in a delay until 2021. Information on the current status of the expansion could not be located.

[33] Original publication, pp. I-4, III-1.

[34] Domestic interested parties' response to the notice of institution, February 1, 2024, pp. 15-16. The domestic interested parties reported that Alcoa and Reynolds, firms that provided U.S. producer questionnaire responses in the original investigations, are no longer producing CAAS. Further, the domestic interested parties reported that five U.S. producers listed in their response (i.e., Golden, Kaiser, Tri-Arrows, United, and Vulcan) produce "relatively modest volumes of CAAS" and are not new entrants in the U.S. CAAS market. Domestic interested parties' supplemental response, February 28, 2024, p. 3.

[35] Domestic interested parties' response to the notice of institution, February 1, 2024, p. 18.

[36] For recent developments regarding tariff treatment and tariffs under Sections 232 and 301, please see "U.S. tariff treatment" section. For information on antidumping and countervailing duty orders issued on imports of the subject product, please see "Previous and related investigations" section.

Item	Firm	Event
Divestiture	Arconic	On October 1, 2018, Arconic announced the sale of its Texarkana, Texas rolling mill to Ta Chen International, Inc. The facility officially reopened under the new ownership in October 2019.
Expansion	Arconic	In February 2019, Arconic announced that it would invest $100 million into its aluminum rolling mill operations in Alcoa, Tennessee. The expansion was expected to bring 200 new jobs to the facility. The most recent available news on the expansion from 2021 indicates that the expansion was still ongoing at that time.
Closure	Arconic	In November 2019, Arconic announced it was closing its San Antonio, Texas rolling mill at the end of the year.
Acquisition	Novelis	In April 2020, Novelis completed its acquisition of Aleris. Novelis acquired rolling mills in Uhrichville, Ohio, and Richmond, Virginia, and casting and finishing facilities in Davenport, Iowa. It was required to divest one plant in Lewisport, Kentucky to meet regulatory conditions of the merger. The Lewisport plant was acquired by American Industrial Partners (“AIP”) and the business was renamed “Commonwealth Rolled Products.”
Production curtailments	JW Aluminum	JW Aluminum’s Goose Creek, South Carolina facility endured several fires between August and December of 2020, leading to operational disruptions, reduced production, and capital expenditures. At least one of the fires resulted in a delay of the facility’s expansion project (which was expected to be complete in 2020) to 2021.
Expansion	Gränges	In March 2021, Gränges announced that it would invest $33 million to expand its aluminum casting operations in Huntingdon, Tennessee to meet growing demand from North American customers. The casting capacity is expected to increase by about 25,000 metric tons (27,558 short tons) per year and enable higher capacity utilization in the downstream rolling and slitting operations.
Expansion	Arconic	In April 2021, Arconic announced a $46 million expansion of its aluminum sheet mill in Mainheim, Pennsylvania. The expansion is expected to bring 70 jobs and increase production capacity by 33 percent.
Expansion	Logan Aluminum	In January 2022, Logan Aluminum, a joint venture owned by Tri-Arrows Aluminum and Novelis, announced an expansion of its rolling mill in Russellville, Kentucky.
Production curtailment	Kaiser Aluminum	In July 2022, Kaiser Aluminum declared force majeure and reduced production at its rolling mill in Warrick, Indiana, due to limited availability of magnesium, an alloy used in many of its products. Kaiser lifted its force majeure and announced full restoration of its capacity in September 2022.
Plant opening	Novelis	In October 2022, Novelis broke ground on a $2.5 billion aluminum recycling and rolling plant in Bay Minette, Alabama. The facility is expected to create up to 1,000 jobs and have a capacity of 600,000 metric tons (661,387 short tons).

Item	Firm	Event
Market entry	Aluminum Dynamics	In July 2022, Steel Dynamics announced it would be entering the aluminum industry with its new company, Aluminum Dynamics. The company broke ground on a new rolling mill in Columbus, Mississippi in March 2023, with an expected capacity of 650,000 metric tons (716,502 short tons). The facility is expected to come online in the first half of 2025.

Source: South Carolina Department of Commerce, "JW Aluminum Investing $255 Million in Berkeley County Operations," June 11, 2018, https://www.sccommerce.com/news/jw-aluminum-investing-255-million-berkeley-county-operations, retrieved February 24, 2024; Light Metal Age, "Texarkana Aluminum Opens Aluminum Rolling Mill Plant," October 29, 2019, https://www.lightmetalage.com/news/industry-news/flat-rolled-sheet/texarkana-aluminum-opens-aluminum-rolling-plant/, retrieved February 24, 2024; Argus Media, "Arconic to Idle Al Rolling Capacity in Texas," November 5, 2019; https://www.argusmedia.com/en/news-and-insights/latest-market-news/2009507-arconic-to-idle-al-rolling-capacity-in-texas, retrieved February 24, 2024; Recycling Today, "DOJ Sues to Stop Novelis Purchase of Aleris, September 5, 2019, https://www.recyclingtoday.com/news/department-justice-lawsuit-novelis-acquisition-aleris/, retrieved February 24, 2024; Recycling Today, "Arconic to Invest $100 million in Expansion," February 13, 2019, https://www.recyclingtoday.com/news/arconic-upgrades-alcoa-tennessee-plant/, retrieved February 24, 2024; Light Metal Age, "Arconic Continues Aluminum Sheet Expansion in Tennessee," August 24, 2021, https://www.lightmetalage.com/news/industry-news/flat-rolled-sheet/arconic-continues-aluminum-sheet-expansion-in-tennessee/, retrieved February 24, 2024; Post and Courier, "Cause of Fire at the Center of SC Aluminum Maker's $100M Insurance Fight," June 25, 2021, https://www.postandcourier.com/business/cause-of-fire-at-the-center-of-sc-aluminum-makers-100m-insurance-fight/article_dc181f5c-d5bd-11eb-acf9-1f50d9796bb5.html, retrieved February 24, 2024; S&P Global, "JW Aluminum Downgraded by S&P Global Ratings to CCC+ on Weakened Metrics," December 22, 2020, https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-III-9 headlines/jw-aluminum-downgraded-by-s-p-global-ratings-to-ccc-on-weakened-metrics-61859111, retrieved February 24, 2024; Gränges, "Gränges to Invest USD 33 Million to Increase Aluminum Casting Capacity in the US," March 25, 2021, https://www.granges.com/newsroom/press-releases/2021/granges-to-invest-usd-33-million-to-increase-aluminium-casting-capacity-in-the-us/, retrieved February 24, 2024; Lancaster Online, "Arconic Eyes $46M Expansion of Manheim Pike Mill, Creating 75 Jobs," April 17, 2021, https://lancasteronline.com/business/local_business/arconic-eyes-46m-expansion-of-manheim-pike-mill-creating-75-jobs/article_3b49da1a-9f04-11eb-a3eb-ebdd831e6239.html, retrieved February 24, 2024; Logan Aluminum, "Logan Aluminum Plans to Expand Beverage Can Sheet Production," January 26, 2022, https://www.lightmetalage.com/news/industry-news/flat-rolled-sheet/logan-aluminum-plans-to-expand-beverage-can-sheet-production/, retrieved February 24, 2024; Kaiser Aluminum, "Kaiser Aluminum Lifts Force Majeure at its Warrick Rolling Mill," September 6, 2022, https://investors.kaiseraluminum.com/investors/news/news-details/2022/Kaiser-Aluminum-Lifts-Force-Majeure-at-its-Warrick-Rolling-Mill-09-06-2022/default.aspx, retrieved February 24, 2024; Novelis, "Novelis Breaks Ground on $2.5 Billion Aluminum Recycling & Rolling Plant," October 7, 2022, https://investors.novelis.com/2022-10-07-Novelis-Breaks-Ground-on-2-5-Billion-Aluminum-Recycling-Rolling-Plant, retrieved February 24, 2024; Steel Dynamics, "Steel Dynamics Announces Investment in New State-of-the-Art Low-Carbon Aluminum Flat Rolled Mill, Aligned with Its Core Steelmaking and Recycling Platforms," July 19, 2022, https://ir.steeldynamics.com/steel-dynamics-announces-investment-in-new-state-of-the-art-low-carbon-aluminum-flat-rolled-mill-aligned-with-its-core-steelmaking-and-recycling-platforms/, retrieved February 24, 2024; Light Metal Age, "Aluminum Dynamics Breaks Ground and Orders New Equipment for Its Mississippi Rolling Plant," March 21, 2023, https://www.lightmetalage.com/news/industry-news/flat-rolled-sheet/aluminum-dynamics-breaks-ground-and-orders-new-equipment-for-its-mississippi-rolling-plant/, retrieved February 24, 2024.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews.[37] Table I-6 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and these current five-year reviews.

Table I-6
CAAS: Trade and financial data submitted by U.S. producers, by period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Item	Measure	2015	2016	2017	2023
Capacity	Quantity	1,675,550	1,674,300	1,623,622	1,955,365
Production	Quantity	1,322,116	1,357,023	1,320,581	1,384,978
Capacity utilization	Ratio	78.9	81.1	81.3	70.8
U.S. shipments	Quantity	1,207,766	1,230,301	1,191,255	1,325,077
U.S. shipments	Value	3,251,632	3,088,303	3,450,041	6,230,324
U.S. shipments	Unit value	2,692	2,510	2,896	4,702
Net sales	Value	3,678,215	3,405,815	3,815,525	6,391,473
COGS	Value	3,434,366	3,098,947	3,585,658	5,582,595
COGS to net sales	Ratio	93.4	91.0	94.0	87.3
Gross profit or (loss)	Value	243,849	306,868	229,867	808,879
SG&A expenses	Value	178,579	208,643	204,288	205,656
Operating income or (loss)	Value	65,270	98,225	25,579	603,223
Operating income or (loss) to net sales	Ratio	1.8	2.9	0.7	9.4

Source: For the years 2015-17, data are compiled using data submitted in the Commission's original investigations. For the year 2023, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, exh. 1.

Note: According to the domestic interested parties, the increase in the unit value of U.S. commercial shipments of CAAS since the final investigations is largely due to the increase in the London Metal Exchange ("LME") price of primary aluminum, which is the principal raw material for CAAS. The LME price of primary aluminum increased from $1,845 per metric ton in January 2019 to $2,488 per metric ton in January 2023. Domestic interested parties' supplemental response, February 28, 2024, p. 3.

Note: For a discussion of data coverage, please see "U.S. producers" section.

[37] Individual company trade and financial data are presented in app. B.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.[38]

In its original determinations, the Commission defined a single domestic like product consisting of all CAAS coextensive with Commerce's scope and it defined the domestic industry to include all domestic producers of CAAS.[39]

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 49 firms, which accounted for approximately 90 percent of total U.S. imports of CAAS from China and 90 percent of imports from nonsubject sources during 2017.[40] Import data presented in the original investigations are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 64 potential U.S. importers of CAAS.[41]

U.S. imports

Table I-7 presents the quantity, value, and unit value of U.S. imports from China, as well as from Canada (the top nonsubject source of U.S. imports in 2023), from countries under previous CAAS orders, and from other nonsubject sources.

[38] Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).
[39] 89 FR 96, January 2, 2024.
[40] Original publication, p. I-4.
[41] Domestic interested parties' response to the notice of institution, February 1, 2024, exh. 7.

Table I-7
CAAS: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons

U.S. imports from	Measure	2018	2019	2020	2021	2022	2023
China	Quantity	166,571	50,827	49,923	76,853	87,537	30,528
Canada	Quantity	151,852	138,302	140,875	143,500	158,716	153,074
Countries under previous orders	Quantity	498,284	660,935	272,792	219,738	268,249	150,131
All other sources	Quantity	172,617	203,287	118,674	204,308	264,555	188,936
Nonsubject sources	Quantity	822,753	1,002,523	532,342	567,546	691,521	492,142
All import sources	Quantity	989,324	1,053,350	582,265	644,399	779,057	522,669
China	Value	465,708	177,469	170,571	322,478	427,439	126,717
Canada	Value	528,353	416,698	373,797	496,636	621,208	532,557
Countries under previous orders	Value	1,558,926	2,007,957	772,666	744,076	1,124,528	555,768
All other sources	Value	681,750	763,790	429,527	829,762	1,347,711	888,626
Nonsubject sources	Value	2,769,029	3,188,445	1,575,990	2,070,474	3,093,448	1,976,950
All import sources	Value	3,234,737	3,365,914	1,746,561	2,392,952	3,520,887	2,103,667
China	Unit value	2,796	3,492	3,417	4,196	4,883	4,151
Canada	Unit value	3,479	3,013	2,653	3,461	3,914	3,479
Countries under previous orders	Unit value	3,129	3,038	2,832	3,386	4,192	3,702
All other sources	Unit value	3,949	3,757	3,619	4,061	5,094	4,703
Nonsubject sources	Unit value	3,366	3,180	2,960	3,648	4,473	4,017
All import sources	Unit value	3,270	3,195	3,000	3,713	4,519	4,025

Table continued.

Table I-7 Continued
CAAS: U.S. imports, by source and period

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, and 7606.92.6095, accessed February 13, 2024. These data may be overstated as HTS statistical reporting numbers 7606.91.3095, 7606.91.6095, 7606.92.3035, and 7606.92.6095 may contain products outside the scope of these reviews. HTS statistical reporting numbers 7606.12.3090, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080 were discontinued, effective July 2019 (see "U.S. tariff treatment" section).

Note: Because of rounding, figure may not add to total shown.

Note: On April 27, 2021, Commerce issued antidumping and/or countervailing duty orders on CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey. The import data presented for "countries under previous orders" include these 16 countries.

Apparent U.S. consumption and market shares

Table I-8 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table I-8
CAAS: Apparent U.S. consumption and market shares, by source and period

Quantity in short tons; value in 1,000 dollars; shares in percent

Source	Measure	2015	2016	2017	2023
U.S. producers	Quantity	1,207,766	1,230,301	1,191,255	1,325,077
China	Quantity	296,495	303,270	390,905	30,528
Nonsubject sources	Quantity	511,084	531,436	602,629	492,142
All import sources	Quantity	807,579	834,706	993,534	522,669
Apparent U.S. consumption	Quantity	2,015,345	2,065,007	2,184,789	1,847,746
U.S. producers	Value	3,251,632	3,088,303	3,450,041	6,230,324
China	Value	739,731	656,865	972,825	126,717
Nonsubject sources	Value	1,542,750	1,460,312	1,746,343	1,976,950
All import sources	Value	2,282,481	2,117,177	2,719,168	2,103,667
Apparent U.S. consumption	Value	5,534,113	5,205,480	6,169,209	8,333,991
U.S. producers	Share of quantity	59.9	59.6	54.5	71.7
China	Share of quantity	14.7	14.7	17.9	1.7
Nonsubject sources	Share of quantity	25.4	25.7	27.6	26.6
All import sources	Share of quantity	40.1	40.4	45.5	28.3
U.S. producers	Share of value	58.8	59.3	55.9	74.8
China	Share of value	13.4	12.6	15.8	1.5
Nonsubject sources	Share of value	27.9	28.1	28.3	23.7
All import sources	Share of value	41.2	40.7	44.1	25.2

Source: For the years 2015-17, data are compiled using data submitted in the Commission's original investigations. For the year 2023, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 7606113060, 7606116000, 7606123090, 7606123091, 7606123096, 7606126000, 7606913090, 7606913095, 7606916080, 7606916095, 7606923035, 7606923090, 7606926080, and 7606926095, accessed February 22, 2024. HTS statistical reporting numbers 7606.12.3090, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080 were discontinued, effective July 2019 (see "U.S. tariff treatment" section).

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from 12 firms, which accounted for approximately 23.7 percent of production of CAAS in China during 2017, and more than 89 percent of U.S. imports of CAAS from China during 2017.[42]

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of more than 200 possible producers of CAAS in China.[43]

Recent developments

Table I-9 presents events in the Chinese industry since the Commission's original investigations. According to Shanghai Metals Market ("SMM"), there are currently around 25 aluminum plate, sheet, strip, and foil projects under construction in China with a total combined production capacity of 4.03 million metric tons (4.44 million short tons). These projects are expected to be online by 2025.[44]

[42] Original publication, p. I-4.

[43] Domestic interested parties' response to the notice of institution, February 1, 2024, exh. 8.

[44] SMM, "SMM Analysis: With The Gradual Release Of New Capacity, The Chinese Aluminum Plate/Sheet, Strip And Foil Industry May Be Reshuffled," January 3, 2024, https://news.metal.com/newscontent/102562015/smm-analysis-with-the-gradual-release-of-new-capacity-the-chinese-aluminum-platesheet-strip-and-foil-industry-may-be-reshuffled, retrieved February 24, 2024.

Table I-9
CAAS: Developments in the Chinese industry

Item	Firm	Event
Expansion	Novelis	In October 2021, Novelis announced a $375 million investment to expand rolling and recycling capacity at its plant in Zhenjiang. The project is expected to be completed by mid-2024.
Expansion	Shandong Nanshan Aluminum Co., Ltd.	In June 2023, Shandong Nanshan Aluminum Co., Ltd. announced an expansion of its sheet plant in the Shandong province. The expansion project will add a new cold rolling mill with an annual capacity of 180,000 metric tons (198,416 short tons).

Source: PRNewswire, Novelis Announces $375 Million Expansion of Automotive Sheet Production and Recycling Operations in China," October 28, 2021, https://www.prnewswire.com/news-releases/novelis-announces-375-million-expansion-of-automotive-sheet-production-and-recycling-operations-in-china-301411605.html, retrieved February 25, 2024; "Light Metal Age, "Shandong Nanshan to Expand Rolling Operations in China," June 19, 2023, https://www.lightmetalage.com/news/industry-news/flat-rolled-sheet/shandong-nanshan-to-expand-rolling-operations-in-china/, retrieved February 25, 2024.

Exports

Table I-10 presents export data for aluminum plates, sheets, and strip, a category that includes CAAS and out-of-scope products, from China (by export destination in descending order of quantity for 2023).

Table I-10
Aluminum plates, sheets, and strip: Quantity of exports from China, by destination and period

Quantity in short tons

Destination market	2018	2019	2020	2021	2022	2023
Mexico	176,138	306,099	307,370	398,058	529,312	403,018
South Korea	345,786	263,836	250,863	282,588	341,878	265,548
Vietnam	123,440	138,856	136,945	199,847	255,325	216,820
Canada	119,551	117,618	147,295	220,965	163,047	172,698
United States	272,548	163,086	145,041	213,735	265,127	151,966
Thailand	145,671	146,694	121,689	162,192	218,473	149,119
Australia	69,911	78,693	96,661	139,354	150,040	129,639
Indonesia	207,036	124,776	85,154	87,234	109,116	104,230
India	198,480	123,411	53,670	77,947	110,315	102,150
Nigeria	116,326	122,606	130,809	137,427	116,497	100,498
All other markets	1,305,808	1,298,218	1,100,309	1,340,644	1,677,993	1,260,945
All markets	3,080,695	2,883,892	2,575,805	3,259,990	3,937,126	3,056,631

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92, February 22, 2024. These data may be overstated as HS subheadings may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to totals shown.

Third-country trade actions

Table I-11 provides information on third country trade actions covering CAAS and other aluminum merchandise from China.

Table I-11
Aluminum sheet: Third country trade actions on imports from China since January 1, 2019

Third countries	Subject products	Date and nature of most recent action	AD or CVD action
Argentina	1XXX or 3XXX aluminum sheet under HS subheadings 7606.91.00 and 7606.92.00	February 21, 2020, final determination	Antidumping rate of 28 percent ad valorem
Armenia	Aluminum alloy strips under HS subheadings 7606.11 and 7606.12	October 24, 2020, final determination	Antidumping rate of 13.14 percent ad valorem
Brazil	Aluminum laminates under HS subheadings 7606.12.90, 7606.91.00, 7606.92.00, 7607.11.90, and 7607.19.90	January 28, 2022, final determination	After an affirmative preliminary determination in February 2021, Brazil's Ministry of Development, Industry, Commerce, and Services made a negative final determination on aluminum laminates from China, citing no sufficient evidence of a causal link between the investigated imports at dumping prices and damages suffered by the domestic industry.
European Union	Aluminum flat-rolled products under HS subheadings 7606.11.10, 7606.11.91, 7606.11.93, 7606.11.99, 7606.12.20, 7606.12.92, 7606.12.93, 7606.12.99, 7606.91.00, 7606.92.00, and 7607.11.90	October 11, 2021, final determination	Antidumping rates ranging between 14.3 and 26.4 percent ad valorem. These duties were suspended for a period of nine months before being reinstated in July 2022.
India	Certain flat-rolled products of aluminum under HS headings 7606 and 7607	September 9, 2021, final determination	Antidumping rates ranging between $0 and $449 per metric ton
Kazakhstan	Aluminum alloy strips under HS subheadings 7606.11 and 7606.12	October 24, 2020, final determination	Antidumping rate of 13.14 percent ad valorem

Third countries	Subject products	Date and nature of most recent action	AD or CVD action
Kyrgyzstan	Aluminum alloy strips under HS subheadings 7606.11 and 7606.12	October 24, 2020, final determination	Antidumping rate of 13.14 percent ad valorem
Russia	Aluminum alloy strips under HS subheadings 7606.11 and 7606.12	October 24, 2020, final determination	Antidumping rate of 13.14 percent ad valorem

Source: Argentina Ministry of Productive Development, "Resolution 88/2020," March 5, 2020, https://servicios.infoleg.gob.ar/infolegInternet/anexos/330000-334999/334757/norma.htm, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/350/ARM, April 19, 2021, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N350ARM.pdf&Open=True, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/370/BRA, October 18, 2022, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N370BRA.pdf&Open=True, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/364/EU, April 13, 2022, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N364EU.pdf&Open=True, retrieved February 25, 2024; Official Journal of the European Union, Commission Implementing Decision EU 2022/1178, July 7, 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022D1178, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/364/IND, April 22, 2022, https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=284069&CurrentCatalogueIdIndex=0&FullTextHash=&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/350/KAZ, April 19, 2020, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N350KAZ.pdf&Open=True, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/350/KGZ, April 19, 2021, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N350KGZ.pdf&Open=True, retrieved February 25, 2024; WTO, Semi-Annual Report Under Article 16.4 of the Agreement, G/ADP/N/350/RUS, April 19, 2021, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N350RUS.pdf&Open=True, retrieved February 25, 2024.

The global market

Table I-12 presents global export data for aluminum plates, sheets, and strip, a category that includes CAAS and out-of-scope products, (by source in descending order of quantity for 2022).[45] China was the largest global exporter of aluminum plates, sheets, and strip in 2022, accounting for approximately 32.6 percent of exports by volume. Germany and South Korea

[45] Complete reporting of export data by all countries for 2023 were not available at the time in which this report was drafted.

were the second and third largest global exporters in 2022, accounting for 12.6 percent and 6.2 percent of exports by volume, respectively.

Table I-12
Aluminum plates, sheets, and strip: Quantity of global exports by country and period

Quantity in short tons

Exporting country	2018	2019	2020	2021	2022
China	3,080,695	2,883,892	2,575,805	3,259,990	3,937,126
Germany	1,758,051	1,841,037	1,521,663	1,658,108	1,524,602
South Korea	608,381	681,299	678,096	701,766	744,976
United States	913,039	747,813	589,742	568,192	613,179
France	526,637	536,306	429,796	527,703	538,332
Italy	361,284	391,874	339,412	377,786	336,869
Belgium	325,745	292,515	250,564	309,987	319,177
Switzerland	318,812	315,135	265,974	296,997	315,124
Turkey	230,216	266,446	240,188	347,113	314,712
Greece	239,328	236,059	228,070	268,199	278,166
All other exporters	3,558,131	3,570,283	3,187,764	3,729,582	3,137,592
All exporters	11,920,320	11,762,658	10,307,074	12,045,425	12,059,855

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7606.11, 7606.12, and 7606.91. These data may be overstated as HS subheadings may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to total shown. Data for 2023 are not presented due to incomplete reporting.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
89 FR 66 January 2, 2024	*Initiation of Five-Year (Sunset) Reviews*	https://www.govinfo.gov/content/pkg/FR-2024-01-02/pdf/2023-28822.pdf
89 FR 96 January 2, 2024	*Common Alloy Aluminum Sheet From China; Institution of Five-Year Reviews*	https://www.govinfo.gov/content/pkg/FR-2024-01-02/pdf/2023-28536.pdf

APPENDIX B

COMPANY-SPECIFIC DATA

* * * * * * *

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDING

Co-extensive single like product: CAAS

Table C-1
CAAS: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, Unit labor costs (dollars per short ton), and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount	2,015,345	2,065,007	2,184,789	1,118,724	1,145,707	8.4	2.5	5.8	2.4
Producers' share (fn1)	59.9	59.6	54.5	55.9	55.6	(5.4)	(0.3)	(5.1)	(0.3)
Importers' share (fn1):									
China	14.7	14.7	17.9	18.0	12.8	3.2	(0.0)	3.2	(5.2)
Nonsubject sources	25.4	25.7	27.6	26.1	31.6	2.2	0.4	1.8	5.5
All import sources	40.1	40.4	45.5	44.1	44.4	5.4	0.3	5.1	0.3
U.S. consumption value:									
Amount	5,534,113	5,205,480	6,169,209	3,084,040	3,624,105	11.5	(5.9)	18.5	17.5
Producers' share (fn1)	58.8	59.3	55.9	57.5	56.5	(2.8)	0.6	(3.4)	(0.9)
Importers' share (fn1):									
China	13.4	12.6	15.8	15.6	10.9	2.4	(0.7)	3.2	(4.7)
Nonsubject sources	27.9	28.1	28.3	26.9	32.5	0.4	0.2	0.3	5.6
All import sources	41.2	40.7	44.1	42.5	43.5	2.8	(0.6)	3.4	0.9
U.S. imports from:									
China:									
Quantity	296,495	303,270	390,905	201,636	146,707	31.8	2.3	28.9	(27.2)
Value	739,731	656,865	972,825	482,141	396,033	31.5	(11.2)	48.1	(17.9)
Unit value	$2,495	$2,166	$2,489	$2,391	$2,699	(0.3)	(13.2)	14.9	12.9
Ending inventory quantity	68,615	83,128	100,728	92,490	69,288	46.8	21.2	21.2	(25.1)
Nonsubject sources:									
Quantity	511,084	531,436	602,629	292,096	362,197	17.9	4.0	13.4	24.0
Value	1,542,750	1,460,312	1,746,343	829,549	1,179,007	13.2	(5.3)	19.6	42.1
Unit value	$3,019	$2,748	$2,898	$2,840	$3,255	(4.0)	(9.0)	5.5	14.6
Ending inventory quantity	88,337	74,637	77,221	66,811	107,982	(12.6)	(15.5)	3.5	61.6
All import sources:									
Quantity	807,579	834,706	993,534	493,732	508,904	23.0	3.4	19.0	3.1
Value	2,282,481	2,117,177	2,719,168	1,311,690	1,575,041	19.1	(7.2)	28.4	20.1
Unit value	$2,826	$2,536	$2,737	$2,657	$3,095	(3.2)	(10.3)	7.9	16.5
Ending inventory quantity	156,952	157,765	177,949	159,301	177,270	13.4	0.5	12.8	11.3
U.S. producers':									
Average capacity quantity	1,675,550	1,674,300	1,623,622	836,474	848,768	(3.1)	(0.1)	(3.0)	1.5
Production quantity	1,322,116	1,357,023	1,320,581	687,733	701,796	(0.1)	2.6	(2.7)	2.0
Capacity utilization (fn1)	78.9	81.1	81.3	82.2	82.7	2.4	2.1	0.3	0.5
U.S. shipments:									
Quantity	1,207,766	1,230,301	1,191,255	624,992	636,803	(1.4)	1.9	(3.2)	1.9
Value	3,251,632	3,088,303	3,450,041	1,772,350	2,049,064	6.1	(5.0)	11.7	15.6
Unit value	$2,692	$2,510	$2,896	$2,836	$3,218	7.6	(6.8)	15.4	13.5
Export shipments:									
Quantity	121,656	110,008	109,913	50,326	63,037	(9.7)	(9.6)	(0.1)	25.3
Value	426,583	317,511	365,485	161,312	234,796	(14.3)	(25.6)	15.1	45.6
Unit value	$3,506	$2,886	$3,325	$3,205	$3,725	(5.2)	(17.7)	15.2	16.2
Ending inventory quantity	150,504	167,218	186,837	179,839	189,473	24.1	11.1	11.7	5.4
Inventories/total shipments (fn1)	11.3	12.5	14.4	13.3	13.5	3.0	1.2	1.9	0.2
Production workers	5,055	5,005	5,032	4,917	4,921	(0.5)	(1.0)	0.5	0.1
Hours worked (1,000s)	11,131	11,190	11,175	5,665	5,781	0.4	0.5	(0.1)	2.0
Wages paid ($1,000)	324,212	338,942	359,016	177,149	194,055	10.7	4.5	5.9	9.5
Hourly wages (dollars per hour)	$29.13	$30.29	$32.13	$31.27	$33.57	10.3	4.0	6.1	7.3
Productivity (short tons per hour)	118.8	121.3	118.2	121.4	121.4	(0.5)	2.1	(2.6)	(0.0)
Unit labor costs (dollars per short ton)	$245.22	$249.77	$271.86	$257.58	$276.51	10.9	1.9	8.8	7.3
Net sales:									
Quantity	1,329,421	1,340,308	1,301,168	675,318	699,840	(2.1)	0.8	(2.9)	3.6
Value	3,678,215	3,405,815	3,815,525	1,933,660	2,283,860	3.7	(7.4)	12.0	18.1
Unit value	$2,767	$2,541	$2,932	$2,863	$3,263	6.0	(8.2)	15.4	14.0
Cost of goods sold (COGS)	3,434,366	3,098,947	3,585,658	1,779,633	2,058,241	4.4	(9.8)	15.7	15.7
Gross profit or (loss)	243,849	306,868	229,867	154,027	225,619	(5.7)	25.8	(25.1)	46.5
SG&A expenses	178,579	208,643	204,288	100,644	79,148	14.4	16.8	(2.1)	(21.4)
Operating income or (loss)	65,270	98,225	25,579	53,383	146,471	(60.8)	50.5	(74.0)	174.4
Net income or (loss)	(26,969)	18,830	(75,643)	11,842	82,176	180.5	(169.8)	(501.7)	593.9
Capital expenditures	175,069	172,884	186,046	84,941	54,930	6.3	(1.2)	7.6	(35.3)
Unit COGS	$2,583	$2,312	$2,756	$2,635	$2,941	6.7	(10.5)	19.2	11.6
Unit SG&A expenses	$134	$156	$157	$149	$113	16.9	15.9	0.9	(24.1)
Unit operating income or (loss)	$49	$73	$20	$79	$209	(60.0)	49.3	(73.2)	164.8
Unit net income or (loss)	($20)	$14	($58)	$18	$117	186.6	(169.3)	(513.8)	569.6
COGS/sales (fn1)	93.4	91.0	94.0	92.0	90.1	0.6	(2.4)	3.0	(1.9)
Operating income or (loss)/sales (fn1)	1.8	2.9	0.7	2.8	6.4	(1.1)	1.1	(2.2)	3.7
Net income or (loss)/sales (fn1)	(0.7)	0.6	(2.0)	0.6	3.6	(1.2)	1.3	(2.5)	3.0

Notes:

fn1.--Reported data are in percent and period changes are in percentage points.

Source: Compiled from data submitted in response to Commission questionnaires, and official U.S. import statistics for HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080, accessed August 22, 2018.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties and it provided contact information for the following three firms as top purchasers of CAAS: ***. Purchaser questionnaires were sent to these three firms and one firm *** provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for CAAS that have occurred in the United States or in the market for CAAS in China since January 1, 2019?

Purchaser	Yes / No	Changes that have occurred
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for CAAS in the United States or in the market for CAAS in China within a reasonably foreseeable time?

Purchaser	Yes / No	Anticipated changes
***	***	***