

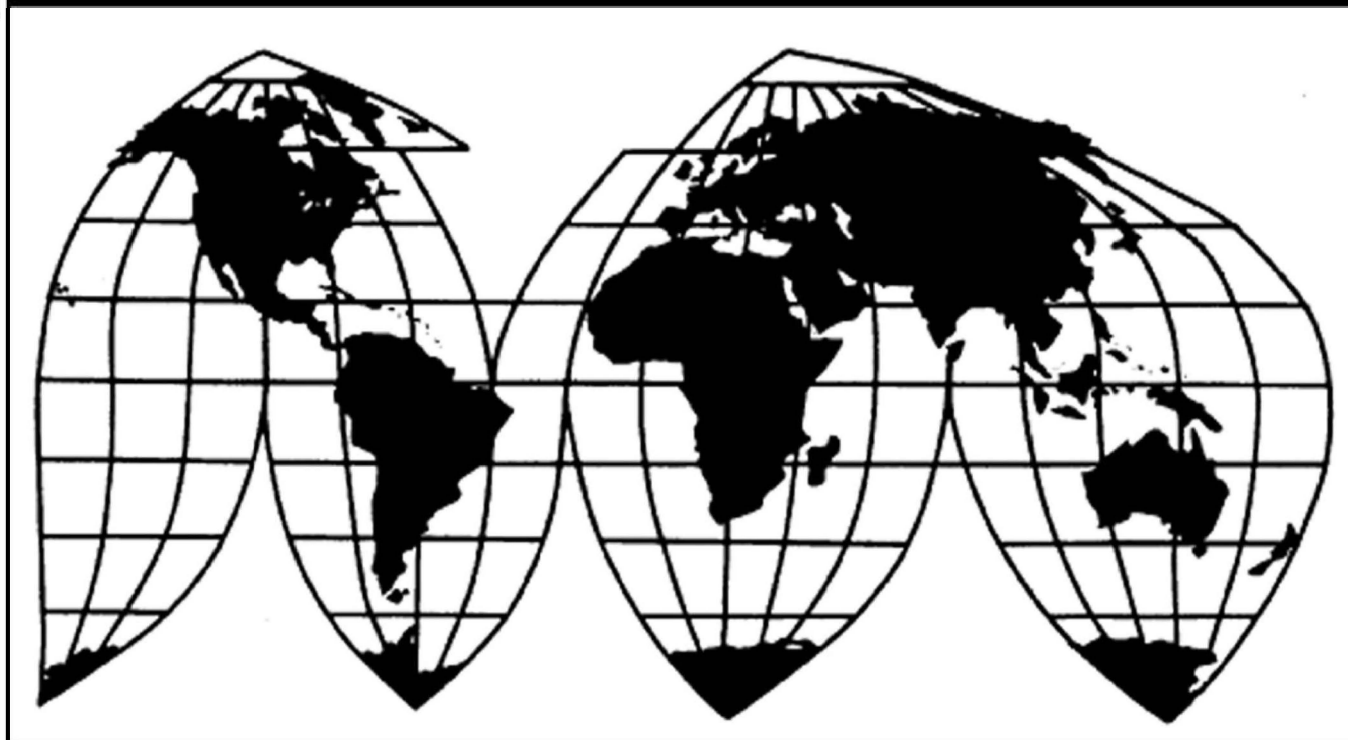
Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

Investigation Nos. 701-TA-639 and 641-642 and
731-TA-1475-1479, 1481-1483, and 1485-1492 (Final)

Publication 5182

April 2021

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	Page
Determinations	1
Views of the Commission	3
Part I: Introduction	I-1
Background	I-1
Statutory criteria	I-3
Organization of report.....	I-4
Market summary	I-4
Summary data and data sources	I-5
Previous and related investigations.....	I-6
Nature and extent of subsidies and sales at LTFV.....	I-8
Subsidies	I-8
Sales at LTFV	I-10
The subject merchandise.....	I-15
Commerce’s scope.....	I-15
Tariff treatment	I-16
Section 232 tariff treatment	I-17
Section 301 tariff treatment	I-18
The product	I-19
Description and applications	I-19
Manufacturing processes.....	I-22
Domestic like product issues	I-26
Intermediate products.....	I-28
Uses	I-29
Markets.....	I-29
Characteristics and functions.....	I-29
Value.....	I-30
Transformation processes	I-30

CONTENTS

	Page
Part II: Conditions of competition in the U.S. market.....	II-1
U.S. market characteristics.....	II-1
U.S. purchasers.....	II-4
Channels of distribution	II-5
Geographic distribution.....	II-11
Supply and demand considerations.....	II-11
U.S. supply	II-11
U.S. demand	II-16
Substitutability issues.....	II-20
Lead times	II-21
Knowledge of country sources.....	II-21
Factors affecting purchasing decisions	II-22
Comparisons of domestic products, subject imports, and nonsubject imports.....	II-25
Comparison of U.S.-produced and imported CAAS.....	II-29
Elasticity estimates.....	II-32
U.S. supply elasticity	II-32
U.S. demand elasticity	II-33
Substitution elasticity	II-33
Part III: U.S. producers' production, shipments, and employment.....	III-1
U.S. producers.....	III-1
Recent developments in U.S. industry	III-6
U.S. production, capacity, and capacity utilization.....	III-10
Alternative products.....	III-16
U.S. producers' U.S. shipments and exports.....	III-17
U.S. producers' inventories	III-19
U.S. producers' imports and purchases.....	III-19
U.S. employment, wages, and productivity.....	III-30

CONTENTS

	Page
Part IV: U.S. imports, apparent U.S. consumption, and market shares.....	IV-1
U.S. importers.....	IV-1
U.S. imports.....	IV-5
Critical circumstances.....	IV-15
Negligibility.....	IV-20
Cumulation considerations.....	IV-22
Fungibility	IV-22
Geographical markets.....	IV-30
Presence in the market.....	IV-34
Apparent U.S. consumption	IV-42
U.S. market shares.....	IV-46
Part V: Pricing data	V-1
Factors affecting prices.....	V-1
Raw material costs.....	V-1
Transportation costs to the U.S. market.....	V-4
U.S. inland transportation costs.....	V-4
Pricing practices	V-5
Pricing structure	V-5
Pricing methods.....	V-6
Sales terms and discounts	V-8
Price leadership	V-8
Price data	V-8
Price trends.....	V-37
Price comparisons.....	V-41
Lost sales and lost revenue.....	V-42

CONTENTS

	Page
Part VI: Financial experience of U.S. producers.....	VI-1
Background	VI-1
Operations on CAAS	VI-2
Revenue.....	VI-14
Cost of goods sold and gross profit or loss	VI-17
SG&A expenses and operating income or loss.....	VI-21
Interest expense, other expenses and income, and net income or loss	VI-21
Capital expenditures and research and development expenses	VI-22
Assets and return on assets.....	VI-25
Capital and investment.....	VI-25
Part VII: Threat considerations and information on nonsubject countries	VII-1
The industry in Bahrain	VII-3
Changes in operations	VII-3
Operations on CAAS.....	VII-4
Alternative products	VII-6
Exports.....	VII-6
The industry in Brazil	VII-8
Changes in operations	VII-9
Operations on CAAS.....	VII-10
Alternative products	VII-13
Exports.....	VII-14
The industry in Croatia	VII-16
Changes in operations	VII-16
Operations on CAAS.....	VII-17
Alternative products	VII-19
Exports.....	VII-20

CONTENTS

	Page
The industry in Egypt.....	VII-22
Changes in operations	VII-23
Operations on CAAS.....	VII-23
Alternative products	VII-25
Exports.....	VII-26
The industry in Germany	VII-28
Changes in operations	VII-29
Operations on CAAS.....	VII-30
Alternative products	VII-32
Exports.....	VII-33
The industry in India	VII-35
Changes in operations	VII-37
Operations on CAAS.....	VII-38
Alternative products	VII-40
Exports.....	VII-41
The industry in Indonesia	VII-43
Exports.....	VII-44
The industry in Italy.....	VII-46
Changes in operations	VII-47
Operations on CAAS.....	VII-48
Alternative products	VII-50
Exports.....	VII-52
The industry in Oman	VII-54
Changes in operations	VII-54
Operations on CAAS.....	VII-55
Alternative products	VII-57
Exports.....	VII-58

CONTENTS

	Page
The industry in Romania.....	VII-60
Changes in operations	VII-60
Operations on CAAS.....	VII-61
Alternative products	VII-63
Exports.....	VII-64
The industry in Serbia.....	VII-66
Changes in operations	VII-66
Operations on CAAS.....	VII-67
Alternative products	VII-69
Exports.....	VII-70
The industry in Slovenia	VII-72
Changes in operations	VII-72
Operations on CAAS.....	VII-73
Alternative products	VII-75
Exports.....	VII-76
The industry in South Africa	VII-78
Changes in operations	VII-78
Operations on CAAS.....	VII-79
Alternative products	VII-82
Exports.....	VII-83
The industry in Spain	VII-85
Changes in operations	VII-86
Operations on CAAS.....	VII-87
Alternative products	VII-90
Exports.....	VII-91

CONTENTS

	Page
The industry in Taiwan	VII-93
Changes in operations	VII-93
Operations on CAAS.....	VII-94
Alternative products	VII-96
Exports.....	VII-97
The industry in Turkey.....	VII-99
Changes in operations	VII-100
Operations on CAAS.....	VII-101
Alternative products	VII-103
Exports.....	VII-104
Subject countries combined.....	VII-106
U.S. inventories of imported merchandise	VII-108
U.S. importers' outstanding orders	VII-113
Antidumping or countervailing duty orders in third-country markets.....	VII-114
Information on nonsubject countries	VII-114
The industry in Canada.....	VII-117
The industry in China.....	VII-119
The industry in Greece	VII-120
The industry in Korea.....	VII-121
The industry in Mexico	VII-122

CONTENTS

	Page
Appendixes	
A. <i>Federal Register</i> notices.....	A-1
B. List of hearing witnesses.....	B-1
C. Summary data.....	C-1
D. Section 232 developments	D-1
E. Channels of distribution, U.S. producers' financial results, foreign producers' production and exports to the U.S. by temper type	E-1
F. U.S. shipments by alloy type (series and cladding) and by temper type	F-1
G. Interchangeability and factors other than price between subject countries	G-1
H. Nonsubject country price data	H-1

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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-639 and 641-642 and 731-TA-1475-1479, 1481-1483, and 1485-1492
(Final)

Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of common alloy aluminum sheet from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey, provided for in subheadings 7606.11.30, 7606.11.60, 7606.12.30, 7606.12.60, 7606.91.30, 7606.91.60, 7606.92.30, and 7606.92.60 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”), and to be subsidized by the governments of Bahrain, India, and Turkey.^{2 3}

BACKGROUND

The Commission instituted these investigations effective March 9, 2020, following receipt of petitions filed with the Commission and Commerce by the Aluminum Association Common Alloy Aluminum Sheet Working Group and its Individual Members, Aleris Rolled Products, Inc., Beachwood, Ohio; Arconic, Inc., Bettendorf, Iowa; Constellium Rolled Products Ravenswood, LLC, Ravenswood, West Virginia; JW Aluminum Company, Daniel Island, South

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

² The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determination are not likely to undermine seriously the remedial effect of the countervailing duty order on common alloy aluminum sheet from Turkey or the antidumping duty order on common alloy aluminum sheet from Indonesia.

³ The Commission terminated its countervailing duty investigation on common alloy aluminum sheet from Brazil and its antidumping duty investigations on common alloy aluminum sheet from Greece and Korea (86 FR 14338, March 15, 2021) following negative final determinations by Commerce.

Carolina; Novelis Corporation, Atlanta, Georgia; and Texarkana Aluminum, Inc., Texarkana, Texas. The final phase of the investigations was scheduled by the Commission following notification of a preliminary determinations by Commerce that imports of common alloy aluminum sheet from Bahrain, Brazil, India and Turkey were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and imports of common alloy aluminum sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey were sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on November 18, 2020 (85 FR 73511). In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing through written testimony and video conference on March 2, 2021. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of common alloy aluminum sheet (“CAAS”) from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and subsidized by the governments of Bahrain, India, and Turkey. We also find that critical circumstances do not exist with respect to imports of CAAS from Indonesia and Turkey subject to Commerce’s affirmative critical circumstances determinations.¹

I. Background

The petitioner in these investigations is the Aluminum Association Common Alloy Aluminum Sheet Trade Enforcement Working Group and its individual members: Aleris Rolled Products, Inc. (“Aleris”); Arconic, Inc. (“Arconic”); Constellium Rolled Products Ravenswood, LLC (“Constellium”); JW Aluminum Company (“JW Aluminum”); Novelis Corporation (“Novelis”); and Texarkana Aluminum, Inc. (“Texarkana”), domestic producers of CAAS (collectively, “Petitioners”).

Several respondents participated in the final phase of these investigations by filing briefs with the Commission.

- AKG North America Inc. (“AKG”), an importer of subject merchandise;
- Alro, S.A. (“Alro”), a producer and exporter of subject merchandise in Romania;
- Chart Industries Inc. (“Chart”), an importer of the subject merchandise;

¹ Commerce issued negative final determinations in three of its investigations, *Common Alloy Aluminum Sheet From Brazil: Final Negative Countervailing Duty Determination*, 86 Fed. Reg. 13289 (Mar. 8, 2021); *Common Alloy Aluminum Sheet From Greece: Final Negative Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 13300 (Mar. 8, 2021); and *Common Alloy Aluminum Sheet From the Republic of Korea: Final Negative Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 13307 (Mar. 8, 2021). The Commission therefore terminated its corresponding investigations of subsidized imports from Brazil and dumped imports from Greece and Korea. *Common Alloy Aluminum Sheet From Brazil, Greece, and Korea; Termination of Investigations*, 86 Fed. Reg. 14338 (Mar. 15, 2021).

- Companhia Brasileira de Alumínio and CBA Itapissuma Ltda (collectively, “CBA”), producers and/or exporters of subject merchandise in Brazil;
- Compañía Valenciana de Aluminio Baux S.L.U. (“Baux”), a producer and exporter of subject merchandise in Spain;
- Government of Bahrain, Gulf Aluminium Rolling Mill B.S.C. (c), a producer and exporter of subject merchandise in Bahrain, and GARMCO USA, Inc., an importer of the subject merchandise (collectively, “GARMCO”);
- Hindalco Industries Limited (“Hindalco”), a producer and exporter of subject merchandise in India;
- Hulamin Operations Proprietary Limited (“Hulamin”), a producer and exporter of the subject merchandise in South Africa;
- Hydro Aluminum Rolled Products GmbH (“HARP”), a producer and exporter of the subject merchandise in Germany;
- Impol d.o.o., (“Impol”), a foreign producer and exporter of the subject merchandise in Slovenia, Croatia, and Serbia;
- Istanbul Ferrous and Non-Ferrous Metals Exporters’ Association, an association of producers and exporters in Turkey and Assan Aluminyum Sanayi ve Ticaret A.S., a producer and exporter of subject merchandise in Turkey (collectively, “Turkish Producers and Exporters”); and
- Oman Aluminium Rolling Company LLC (“OARC”), a producer and exporter of the subject merchandise in Oman.²

² In addition to their individual briefs, Alro, CBA, GARMCO, Hulamin, HARP, and the Turkish Producers and Exporters (“Joint Respondents”) filed a joint prehearing brief and final comments. The European Commission also filed brief comments. ElvalHalcor Hellenic Copper and Aluminum Industry S.A. (“ElvalHalcor”), a producer and exporter of subject merchandise in Greece, also filed a brief before the investigation involving Greece was terminated. In addition to filing briefs, industry witnesses and/or counsel on behalf of several respondents attended the Commission’s public hearing of March 2, 2021.

U.S. industry data for the CAAS industry are based on the questionnaire responses of 11 firms, which accounted for the vast majority of U.S. production of CAAS in 2019.³ U.S. import data are based on official import statistics except as otherwise noted.⁴ The Commission also received questionnaire responses from 95 U.S. importers, accounting for 92.4 percent of U.S. imports from subject sources.⁵ It received responses to its foreign producer questionnaire from one firm in Bahrain, three firms in Brazil, one firm in Croatia, one firm in Egypt, four firms in Germany, three firms in India, seven firms in Italy, one firm in Oman, one firm in Romania, one firm in Serbia, one firm in Slovenia, one firm in South Africa, three firms in Spain, one firm in Taiwan, and five firms in Turkey.⁶ The Commission also received questionnaire responses from 52 purchasers of CAAS.⁷

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁸ Section 771(4)(A) of the Tariff Act of 1930, as amended (“The Tariff Act”), defines the relevant domestic industry as the “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

See CR/PR at B-3 to B-8. In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted the hearing by videoconference and written witness testimony as set forth in procedures provided to the parties.

³ Confidential Report, INV-TT-042 (Mar. 19, 2021), as revised by INV-TT-047 (Mar. 30, 2021) (“CR”) at I-5; Public Report (“PR”) at I-5.

⁴ CR/PR at IV-2.

⁵ CR/PR at IV-1 to IV-2.

⁶ CR/PR at VII-3, VII-8, VII-16, VII-22, VII-28, VII-35, VII-46, VII-54, VII-60, VII-66, VII-72, VII-78, VII-85, VII-93, and VII-99. No foreign producer in Indonesia responded to the Commission questionnaire. CR/PR at VII-43.

⁷ CR/PR at V-43. Of the 52 responding purchasers, 43 purchased domestic CAAS, and 41 purchased imports of the subject merchandise (Bahrain (18), Brazil (11), Croatia (7), Egypt (9), Germany (18), India (15), Indonesia (10), Italy (11), Oman (16), Romania (8), Serbia (1), Slovenia (6), South Africa (10), Spain (11), Taiwan (8), and Turkey (15)). CR/PR at II-4.

⁸ 19 U.S.C. § 1677(4)(A).

the product.”⁹ In turn, 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.”¹⁰

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.¹¹ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”¹² The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹³ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.¹⁴ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁵ The

⁹ 19 U.S.C. § 1677(4)(A).

¹⁰ 19 U.S.C. § 1677(10).

¹¹ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

¹² *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹³ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

¹⁴ *See, e.g., Cleo*, 501 F.3d at 1299; *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co.*, 747 F. Supp. at 749 n.3 (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁵ *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁶

B. Product Description

In its final determinations, Commerce defined the imported merchandise within the scope of the investigations as:

common alloy aluminum 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 investigation 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. The use of a proprietary alloy or non-proprietary alloy that is not specifically registered by the Aluminum Association as a discrete 1XXX-, 3XXX-, or 5XXX-series alloy, but that otherwise has a chemistry that is consistent with these designations, does not remove an otherwise in-scope product from the scope.

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 this investigation if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of these investigations 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, H-39, or H-391 temper. In addition, aluminum can stock has a lubricant applied to the flat

¹⁶ *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

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.

Common alloy sheet is currently classifiable under HTSUS subheadings 7606.11.3060, 7606.11.6000, 7606.12.3096, 7606.12.6000, 7606.91.3095, 7606.91.6095, 7606.92.3035, and 7606.92.6095. Further, merchandise that falls within the scope of these investigations may also be entered into the United States under HTSUS subheadings 7606.11.3030, 7606.12.3015, 7606.12.3025, 7606.12.3035, 7606.12.3091, 7606.91.3055, 7606.91.6055, 7606.92.3025, 7606.92.6055, 7607.11.9090. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.¹⁷

CAAS is a thin wrought aluminum product that is produced via a rolling process. It is produced in a variety of gauges or levels of thickness, though the subject product has a thickness greater than 0.2 mm up to 6.3 mm.¹⁸ CAAS is used in a wide variety of applications, with different aluminum alloys used to elicit required characteristics of the aluminum. Some common alloys of CAAS are 3003, 3105 and 5052.¹⁹ Common applications for Alloy 3003 sheet include heat exchangers, air conditioner evaporators, motor vehicle radiators, piping, oil tanks, and home appliances. Alloy 3105 sheet is commonly used in manufacturing mobile homes, residential siding, and rain carrying goods (*e.g.*, gutters and downspouts). Common applications for Alloy 5052 sheet include architecture, general sheet metal work, heat exchangers, and vehicle applications such as meter display panels, AT drums, air bag inflators, fuel tanks, and covers.²⁰

¹⁷ See, *e.g.*, *Common Alloy Aluminum Sheet from Bahrain: Final Affirmative Determination of Sales at Less than Fair Value*, 86 Fed. Reg. 13331, 13333 (Mar. 8, 2021); *Common Alloy Aluminum Sheet from Bahrain: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 13333, 13335 (Mar. 8, 2021); *Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey: Scope Comments Final Decision Memorandum* (Mar. 1, 2021).

¹⁸ CR/PR at I-19.

¹⁹ CR/PR at I-20.

²⁰ CR/PR at I-19 to I-20.

There are three distinct stages in manufacturing CAAS: (1) melting and refining aluminum, (2) casting aluminum into semi-finished forms such as sheet ingot, and (3) rolling semi-finished forms into flat-rolled products such as aluminum sheet.²¹ “Re-roll” is an intermediate in-scope CAAS product for which the first two steps of the three-step process have been completed. Re-roll is therefore a semi-finished product and given an F-temper designation, meaning that it is fabricated, but must undergo additional shaping, finishing, or thermal processes in order to be later designated as a finished temper product that can be used in downstream applications.²²

C. Arguments of the Parties

1. Petitioners

Petitioners argue that the Commission should define a single domestic like product consisting of all CAAS coextensive with Commerce’s scope as it did in the preliminary phase of these investigations. They assert that there is no information on the record that indicates a different domestic like product definition is appropriate.²³

Petitioners also argue that re-roll is a semi-finished upstream product that is suitable for use only in producing downstream final gauge and temper products, and the Commission should reject any argument that re-roll coils should be a separate domestic like product. They contend that the Commission’s semi-finished product analysis indicates that a single domestic like product is appropriate in these investigations.²⁴ Petitioners claim that all domestically-produced re-roll is dedicated to the production of final gauge or temper aluminum product, that there is no separate market for re-roll, and that re-roll generally shares the same physical characteristics as other in-scope CAAS with respect to alloy designation and chemistry, which they view as the two most significant physical characteristics.²⁵ According to Petitioners, the cost of producing final temper products from re-roll aluminum sheet is less than that of

²¹ CR/PR at I-23.

²² CR/PR at I-26 n.50.

²³ Petitioners’ Prehearing Brief at 4-5 (citing *Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey*, USITC Pub. 5049 (Prelim.) (Apr. 2020) at 9 (“Preliminary Determinations”)); Petitioners’ Posthearing Brief, Exhibit 1 at 109-11.

²⁴ Petitioners’ Prehearing Brief at 6-9.

²⁵ Petitioners’ Prehearing Brief at 7.

producing the re-roll product.²⁶ They recognize that the amount of capital equipment and labor required to transform upstream re-roll into a final gauge/temper product is not insignificant, but contend that it is far less than the capital equipment and labor required to melt, cast, and hot-roll the intermediate coil.²⁷

2. Respondents

OARC asserts that, under the Commission's semi-finished like product analysis, it is appropriate to define the in-scope intermediate upstream product, re-roll, as a separate domestic like product from in-scope finished CAAS.²⁸ First, OARC argues that re-roll is not dedicated to the production of CAAS and can be used to produce out-of-scope aluminum foil.²⁹ It further argues that there is a separate market for re-roll, as demonstrated by the commercial sales purchases of re-roll by domestic producers. OARC asserts that purchasers' questionnaire responses confirm that there is a separate market.³⁰

OARC also maintains that the physical characteristics and functions of re-roll stock change significantly when processed into CAAS products. It claims that re-roll is always designated as F temper, unlike the other temper designations of finished CAAS that require additional rolling and/or annealing. OARC notes that ten U.S. producers indicated that there are differences in the physical characteristics and functions of re-roll stock and CAAS, and it argues that the additional cost of producing downstream CAAS products from re-roll stock is substantial as confirmed by 25 of 36 U.S. purchasers that indicated there is a significant difference in the cost or value between re-roll stock and CAAS. It also asserts that 22 of 36 U.S. purchasers indicated that the processes used to transform re-roll stock into final temper CAAS are significant and labor or capital intensive.³¹

²⁶ They calculate that the raw materials, labor, and energy cost associated with producing semi-finished re-roll coils account for *** percent of the overall cost of a final gauge/temper product. Petitioners' Prehearing Brief at 8 (*citing* Exhibit 3 (Keown Decl.) and Exhibit 2 (Vrablec Decl.)).

²⁷ Petitioners' Prehearing Brief at 8-9.

²⁸ The Joint Respondents do not disagree with the Commission's definition of the domestic like product from the preliminary phase of these investigations, *i.e.* coextensive with Commerce's scope definition. Joint Respondents' Prehearing Brief at 5.

²⁹ OARC estimates that the vast majority of re-roll stock that it sells to U.S. customers is used to produce aluminum foil, with a significantly smaller percentage used in the production of in-scope CAAS. OARC's Posthearing Brief at 6.

³⁰ OARC's Prehearing Brief at 12-13.

³¹ OARC's Prehearing Brief at 12-14.

D. Analysis

In its preliminary determinations, the Commission defined a single domestic like product as all CAAS, coextensive with the scope of the investigations.³² It indicated that the preliminary phase investigations involved the same product and scope definition as *Common Alloy Aluminum Sheet from China*,³³ contained no new information in the record to warrant reaching a different definition, and no party had raised any arguments to the contrary. The Commission therefore defined the domestic like product to be coextensive with the scope of the investigations.³⁴

In the final phase of these investigations, Hulamin, OARC, and the United Aluminum Corporation (“UAC”) requested in their comments on the draft questionnaires that the Commission collect separate data for “F temper” or “re-roll” an intermediate CAAS product, along with data for finished CAAS products.³⁵ OARC requested that the Commission consider in the final phase of these investigations whether re-roll should be defined as a separate domestic like product.³⁶

We consider below whether the upstream product – re-roll – and the downstream product – final temper CAAS – are part of a single domestic like product. We agree with the parties that the use of the semifinished products analysis is appropriate for this inquiry concerning upstream and downstream CAAS products.³⁷ As explained below, we find that it is

³² *Preliminary Determinations*, USITC Pub. 5049, at 9.

³³ *Common Alloy Aluminum Sheet from China*, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final) USITC Pub. 4861 (Jan. 2019) (hereinafter, “*CAAS from China*”).

³⁴ *Preliminary Determinations*, USITC Pub. 5049, at 9.

³⁵ See CR/PR at I-26 to I-27.

³⁶ See Hulamin’s Comments on Draft Questionnaires, July 31, 2020, at 3-5; OARC’s Comments on Draft Questionnaires, July 31, 2020, at 13-14; UAC’s Comments on Draft Questionnaires, July 31, 2020, at 13-14.

³⁷ In a semi-finished products analysis, the Commission examines the following: (1) the significance and extent of the processes used to transform the upstream into the downstream articles; (2) whether the upstream article is dedicated to the production of the downstream article or has independent uses; (3) differences in the physical characteristics and functions of the upstream and downstream articles; (4) whether there are perceived to be separate markets for the upstream and downstream articles; and (5) differences in the costs or value of the vertically differentiated articles. See, e.g., *Glycine from India, Japan, and Korea*, Inv. Nos. 731-TA-1111-1113 (Preliminary), USITC Pub. No. 3921 at 7 (May 2007); *Artists’ Canvas from China*, Inv. No. 731-TA-1091 (Final), USITC Pub. No. 3853 at 6 (May 2006); *Live Swine from Canada*, Inv. No. 731-TA-1076 (Final), USITC Pub. 3766 at 8 n.40 (Apr. 2005); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Preliminary), USITC Pub. No. 3533 at 7 (Aug. 2002).

not appropriate to define upstream re-roll or downstream final temper CAAS to be a separate domestic like product.

Dedication for Use. Petitioners assert that re-roll stock is a semifinished product that is consumed in producing final gauge/temper CAAS products and has no independent uses or function separate from that of a finished product.³⁸ Although OARC states that its U.S. imports of re-roll from Oman are used for aluminum foil, according to the domestic producers, all domestically produced re-roll is used to produce CAAS.³⁹

Separate Markets. All ten responding domestic producers reported that there is no separate market for re-roll that is distinct from the market for final temper CAAS. On the other hand, 24 of 39 responding U.S. purchasers reported that there are separate markets for re-roll and final temper CAAS.⁴⁰ During the POI there were limited amounts of re-roll sold to other domestic producers to be converted into finished CAAS products.⁴¹ In 2017, domestic producers sold *** short tons of re-roll.⁴² Sales of re-roll increased to *** short tons in 2019, but the increase was due to ***.⁴³ In any case, sales of finished CAAS were far greater than that of re-roll, totaling *** short tons in 2019, and the sales of domestically produced re-roll were for the purpose of producing finished CAAS.⁴⁴

Differences in Physical Characteristics and Functions of the Upstream and Downstream Articles. Although certain physical characteristics such as alloy and chemistry are identical between re-roll stock CAAS and final temper CAAS, they have different tempers, gauges, thickness, and widths.⁴⁵ All ten responding U.S. producers and 28 of 38 responding U.S. purchasers also reported differences in physical characteristics.⁴⁶

Differences in Value. Questionnaire data collected from domestic firms that produce re-roll indicate that the average unit value (“AUV”) for re-roll was \$***, while the AUV for finished

³⁸ Petitioners’ Prehearing Brief at 6; *see also* Tr. at 141 (Mr. Herrmann) and Petitioners’ Posthearing Brief, Exhibit 1 at 110.

³⁹ Hearing Tr. at 141-142 (Keown, Ricci, Stemple, Vrabec). OARC does not identify the firms it claims are producing products other than CAAS from re-roll, but it appears that it is referring to re-roll from Oman whereas the Commission’s domestic like product analysis focuses on domestically produced products. *See* OARC’s Final Comments at 2 (“OARC estimates that the vast majority of re-roll stock that it sells to U.S. customers is used to produce aluminum foil, with a significantly smaller percentage used in the production of in-scope CAAS products.”).

⁴⁰ CR/PR at Table I-29.

⁴¹ CR/PR at Table E-3.

⁴² CR/PR at Table E-3.

⁴³ CR/PR at VI-15 n.9 and Table E-3. ***. CR/PR at III-14 n.4.

⁴⁴ CR/PR at Table E-5.

⁴⁵ CR/PR at I-29.

⁴⁶ CR/PR at I-29.

CAAS was \$*** in 2019, indicating that the value added by the finishing process is roughly *** percent of the total value of finished CAAS.⁴⁷

Extent of Processes Used to Transform Downstream Product into Upstream Product. The process for manufacturing re-roll into finished CAAS consists of cold rolling and in some cases, annealing.⁴⁸ Four of ten responding U.S. producers and 22 of 36 responding U.S. purchasers described the processes used to transform re-roll stock CAAS into final temper CAAS as significant and labor or capital intensive.⁴⁹

Conclusion. We find the record indicates that it is appropriate to define a single domestic like product coextensive with Commerce's scope definition and not define re-roll as a separate domestic like product. According to domestic producers, all domestically-manufactured re-roll is dedicated for use to produce finished CAAS, and there is no separate market for re-roll CAAS.⁵⁰ Although there are some significant differences in physical characteristics between re-roll CAAS and final temper CAAS, certain physical characteristics such as alloy and chemistry are identical. We recognize that the process to transform re-roll into finished CAAS is not insignificant, but the evidence indicates that the value added is modest. Weighing the above factors, we conclude that it is not appropriate to define re-roll as a separate domestic like product.

We therefore define the domestic like product to be coextensive with the scope of the investigations.⁵¹

⁴⁷ CR/PR at Tables E-3 and E-5.

⁴⁸ CR/PR at I-25 n.50. *See also* OARC's Prehearing Brief at 12; Petitioners' Prehearing Brief at 8.

⁴⁹ CR/PR at I-30.

⁵⁰ Petitioners' Prehearing Brief at 6; *see also* Tr. at 141 (Mr. Herrmann) and Petitioners' Posthearing Brief, Exhibit 1 at 110.

⁵¹ Chart's argument concerning exclusion of 3003 aluminum alloy clad sheet from the scope of the investigation as a separate domestic like product because the product is not produced in the United States is unavailing. Chart's Posthearing Brief at 3-6. Chart raised this argument for the first time at the Commission's hearing and does not address any of the Commission's like product factors. *Id.*; Hearing Tr. at 194 (Hayward). The Commission has consistently rejected arguments that it has the authority to "exclude" an article from the scope of an antidumping or countervailing duty investigation. *See, e.g., Certain Cold Rolled Steel Products from Australia et al.*, Inv. Nos. 731-TA-965, -971-72, -979, -980 (Final), USITC Pub. 3536 (Sept. 2002) at 10, n. 31. The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989). Therefore, exclusion of a product from the scope is an issue for Commerce and not the Commission. Although Chart also proposes that the clad sheet product should be a separate domestic like product, the argument is not only untimely (*see* Section 207.20(b)) but inconsistent with the statute. Commission

III. Domestic Industry

The statute defines the relevant industry as the “producers as a {w}hole 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.”⁵² 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.

In defining the domestic industry, we consider 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. 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.⁵³ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.⁵⁴

Seven domestic producers – *** – are subject to the related party provision because they are an importer of subject merchandise and/or are controlled by an importer or exporter

cannot define a type of product within the scope as a separate domestic like product for which there is no domestic industry; instead, the statute requires it to define as the domestic like product the product which is “most similar in characteristics and uses with, the article subject to an investigation.” 19 U.S.C. § 1677(10); see, e.g., *Certain Aluminum Extrusions from China*, Inv. Nos. 701-TA-475 and 731-TA-1177 (Review), USITC Pub. 4677 at 11-16 (Mar. 2017); *Grain-Oriented Electrical Steel from Germany, Japan, and Poland*, Inv. Nos. 731-TA-1233, 1234, and 1236 (Final), USITC Pub. 4491 at 10 & n.49 (Sept. 2014).

⁵² 19 U.S.C. § 1677(4)(A).

⁵³ 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).

⁵⁴ 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;
- (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. U.S. Int’l Trade Comm’n*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int’l Trade 2015); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

of subject merchandise.⁵⁵ In the preliminary phase of the investigations, the Commission found that appropriate circumstances did not exist to exclude any of the seven domestic producers that implicate the related parties provision.⁵⁶ As we explain below, we do not find appropriate circumstances to exclude any of the related party producers from the domestic industry based upon the related party provision in the final phase investigations.

A. Arguments of the Parties

1. Petitioners

Petitioners argue that appropriate circumstances do not exist to exclude any of the seven domestic producers that are related parties from the domestic industry. They argue that each of the related parties either reported not importing at all or importing or purchasing small quantities of subject merchandise in order to supplement their production. In each case, they maintain that the producer's primary interest lies in domestic production and sales of CAAS.⁵⁷ With respect to Texarkana, petitioners contend that the *** and the over \$*** made to *** primary focus is in domestic production. They note that in interim 2020 *** largest domestic producer.⁵⁸

2. Respondents

Joint Respondents argue that there are appropriate circumstances to exclude *** as a related party. They emphasize that it is 100 percent owned by ***, the *** importer of CAAS and responsible for *** percent of all subject imports in 2019. Joint Respondents contend that *** imports and sales of CAAS from subject sources are far greater than *** domestic production. They claim that *** results will skew the results for the domestic industry as it operated at low capacity utilization, relied on imports, and made *** of CAAS. In short, they assert the record demonstrates that *** primary interest, as a *** foreign-production and import business.⁵⁹

⁵⁵ *** are subject to the related parties provision because they imported subject CAAS during the POI. See CR/PR at Table III-10. In addition, *** are related parties because they are related to an importer or exporter of subject merchandise. See CR/PR at Table III-2.

⁵⁶ *Preliminary Determinations*, USITC Pub. 5049, at 10-14.

⁵⁷ Petitioners' Prehearing Brief at 10-14.

⁵⁸ Petitioners' Posthearing Brief, Exhibit 1 at 103.

⁵⁹ Joint Respondents' Prehearing Brief at 7-11.

AKG argues that petitioners *** should be excluded as related parties. AKG contends that they are both owned by foreign producers and have a primary interest in worldwide rather than domestic production.⁶⁰

B. Analysis

***⁶¹ *** in 2020, so it is now related to exporters of subject merchandise in ***. ***⁶² *** imports and the exports from the related exporters are, however, modest compared to *** production of CAAS.⁶³

We find that appropriate circumstances do not exist to exclude *** from the domestic industry. Its U.S. production is considerably larger than the exports to the United States from the related exporters or ***' imports of subject merchandise, indicating that *** principal interest is in domestic production.⁶⁴

***⁶⁵ *** is subject to the related party provision because it imported subject merchandise during the POI. *** imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2018 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2019 (the equivalent of *** percent of its domestic production), *** short tons from *** in interim 2019 (the equivalent of *** percent of its domestic production), and *** short tons from *** in interim 2020 (the equivalent of *** percent of its domestic production).⁶⁶

The ***. Also, no party has argued that *** should be excluded from the definition of the domestic industry. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

⁶⁰ AKG's Posthearing Statement at 17-18.

⁶¹ CR/PR at Table III-1. *** was the *** domestic producer in 2019, accounting for *** percent of domestic production. *Id.*

⁶² See CR/PR at III-10. *** imports from subject sources totaled *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in interim 2019, and *** short tons in interim 2020. CR/PR at Table III-10.

⁶³ *** reported production of *** short tons in 2019. CR/PR at Table III-5. *** exported *** short tons to the United States in 2019. CR/PR at Table VII-4. *** exported *** short tons of CAAS to the United States in 2019 and *** exported *** short tons to the United States in 2019. CR/PR at Table VII-18. *** exported *** short tons to the United States in 2019. CR/PR at Table VII-29.

⁶⁴ While *** also purchased subject imports from *** during the POI, CR/PR at Table III-12, these purchases were not substantial and do not demonstrate control of large volumes of subject imports as required by the statute. See CR/PR at Tables III-12 and IV-2; 19 U.S.C. § 1677(4)(B)(ii)(III).

⁶⁵ *** was the *** domestic producer in 2019, accounting for *** percent of domestic production. CR/PR at Table III-1.

⁶⁶ CR/PR at Table III-10.

***.⁶⁷ Although *** did not import subject merchandise during the POI, it nonetheless implicates the related party provision because it has a related exporter of subject merchandise in ***.⁶⁸

*** U.S. production of *** short tons in 2019 is considerably larger than the *** short tons which it *** source (*** in 2019 (representing just *** percent of the company's domestic production),⁶⁹ and is also considerably larger than the *** short tons of exports to the United States in 2019 from its related exporter, indicating that *** principal interest is in domestic production.⁷⁰ We find that the appropriate circumstances do not exist to exclude *** from the domestic industry.

***.⁷¹ *** is subject to the related party provision because it ***.⁷² *** imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2018 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2019 (the equivalent of *** percent of its domestic production), *** short tons from *** in interim 2019 (the equivalent of *** percent of its domestic production), and *** short tons from *** in interim 2020 (the equivalent of *** percent of its domestic production).⁷³ *** stated that it ***.⁷⁴

The ***. Also, no party has argued that *** be excluded from the definition of the domestic industry. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

***.⁷⁵ *** is subject to the related party provision because it imported subject merchandise during the POI. It imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons in 2018 (the equivalent of *** percent of its domestic production), *** short tons in 2019 (the equivalent of *** percent

⁶⁷ CR/PR at Table III-1. *** was the *** domestic producer in 2019, accounting for *** percent of domestic production. *Id.*

⁶⁸ CR/PR at Table III-2; VII-28. *** exported *** short tons to the United States in 2019. CR/PR at Table VII-18.

⁶⁹ CR/PR at Tables III-5, III-10.

⁷⁰ CR/PR at Tables III-10, VII-18.

⁷¹ *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production. CR/PR at Table III-1.

⁷² *** has a wholly owned subsidiary, ***, a producer and exporter of CAAS in ***. CR/PR at Table III-2. The firm exported *** short tons of CAAS to the United States in 2019. CR/PR at Table VII-59.

⁷³ CR/PR at Table III-10.

⁷⁴ CR/PR at Table III-10.

⁷⁵ CR/PR at Table III-1. *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production. *Id.*

of its domestic production), *** short tons in interim 2019 (the equivalent of *** percent of its domestic production), and *** short tons in interim 2020 (the equivalent of *** percent of its domestic production).⁷⁶ It stated that it imported to ***.⁷⁷

The small share of *** imports relative to its domestic production indicates that its principal interest lies in domestic production. Also, no party has argued that it be excluded from the definition of the domestic industry. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

***.⁷⁸ *** is subject to the related party provision because it ***.⁷⁹ It imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2018 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2019 (the equivalent of *** percent of its domestic production), *** short tons from *** in interim 2019 (the equivalent of *** percent of its domestic production), and *** short tons from *** in interim 2020 (the equivalent of *** percent of its domestic production).⁸⁰ *** stated that it imported to ***.⁸¹

***' imports of subject merchandise were modest relative to its domestic production over most of the POI and *** suggesting that it is committed to production of CAAS in the United States.⁸² There is no indication that its imports of the subject merchandise shielded it from subject imports to any significant degree or benefited its domestic CAAS production operations.⁸³ Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

***.⁸⁴ *** is subject to the related party provision because it imported subject merchandise during the POI and ***.⁸⁵ Notably, ***.⁸⁶

⁷⁶ CR/PR at Table III-10.

⁷⁷ CR/PR at Table III-10.

⁷⁸ *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production. See CR/PR at Table III-1.

⁷⁹ *** Moreover, ***, owns *** CR/PR at Table III-2. *** exported *** short tons of CAAS to the United States in 2019. Table VII-23.

⁸⁰ CR/PR at Table III-10.

⁸¹ CR/PR at Table III-21, Table III-10. ***. CR/PR at III-20.

⁸² CR/PR at Table III-3.

⁸³ All of *** affiliates during the period of investigations involved CAAS products that were further processed in the United States by *** into out-of-scope products. ***. CR/PR at III-20.

⁸⁴ CR/PR at Table III-1. *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production. *Id.*

⁸⁵ CR/PR at Tables III-2 and III-11. See 19 U.S.C. § 1677(4)(B)(ii)(III).

⁸⁶ See CR/PR at VI-1 n.3, Tables III-3, III-11.

*** directly imported *** short tons of CAAS from *** in 2019 (the equivalent of *** percent of its domestic production) and *** short tons of CAAS from *** in interim 2019 (the equivalent of *** percent of its domestic production).⁸⁷ Further, *** during the POI.⁸⁸ It imported *** short tons of subject merchandise during 2019 equivalent to *** percent of *** short tons during 2019, *** short tons of subject merchandise during interim 2019 equivalent to *** percent of *** short tons during interim 2019, and *** short tons of subject merchandise during interim 2020 equivalent to *** percent of *** short tons during interim 2020.⁸⁹ ***,⁹⁰ and reported *** during the POI.⁹¹ It *** the imposition of antidumping and countervailing duties.⁹²

***. Despite *** ratio of imports to *** domestic production until interim 2020, ***.⁹³ Further, *** suggesting the focus for *** increasingly lies in domestic production. Thus, the additional information available in the final phase of these investigations indicates that *** principal interest is in domestic production.⁹⁴ Nor is there an indication that ***. We consequently find appropriate circumstance do not exist to exclude *** from definition of the domestic industry.

Therefore, we include all domestic producers of CAAS in the definition of the domestic industry.

IV. Negligibility

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product shall be deemed negligible if they account for less than three percent (or four percent in the case of a developing country in a countervailing duty investigation) of all such merchandise imported into the United States

⁸⁷ CR/PR at Table III-10. ***. It explained ***. *Id.*

⁸⁸ See CR/PR at Table IV-1.

⁸⁹ CR/PR at Tables III-10 and III-11. ***. See CR/PR at Table III-11.

⁹⁰ CR/PR at VI-1 n.3.

⁹¹ ***.

⁹² See *** Producer Questionnaire at I-4.

⁹³ See CR/PR at Tables III-10 and III-11.

⁹⁴ Additional indication of *** focus on growing its domestic production can be found in the questionnaire it submitted to the Commission. With respect to actual and anticipated negative effects of subject imports on investment, growth and development during the POI, *** reported as follows: *** CR/PR at Table VI-9; see also Petitioners' Posthearing Brief, Exhibit 1 at 27, 34-35.

during the most recent 12 months for which data are available preceding the filing of the petition.⁹⁵

The statute further provides that subject imports from a single country that comprise less than 3 percent of such total imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.⁹⁶ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (USTR)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.⁹⁷

A. Arguments of the Parties

1. Petitioners

Petitioners contend that the Commission should not terminate any of the current investigations on the basis of negligibility. They argue that subject imports from nine countries (Bahrain, Brazil, Germany, India, Indonesia, Oman, South Africa, Taiwan, and Turkey) subject to antidumping duty investigations are not negligible because subject imports from each country surpass the 3 percent threshold of total U.S. imports during the relevant period (March 2019-February 2020).⁹⁸ Petitioners observe that subject imports from seven countries (Croatia, Egypt, Italy, Romania, Serbia, Slovenia, and Spain) are under the 3 percent threshold, but argue that they exceed the 7 percent threshold in the aggregate.⁹⁹

2. Respondents

Baux argues that subject imports from Spain were below the 3 percent negligibility threshold during the relevant 12-month period. It contends that if Commerce finds ministerial errors in its calculations and these errors change the affirmative final determination to a

⁹⁵ 19 U.S.C. §§ 1671d(b), 1673d(b), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

⁹⁶ 19 U.S.C. § 1677(24)(A)(ii).

⁹⁷ 19 U.S.C. § 1677(24)(B).

⁹⁸ Petitioners' Prehearing Brief at 15.

⁹⁹ Petitioners' Prehearing Brief at 15.

negative final determination for the countries now under 3 percent, the current 9.3 percent aggregated negligible imports could fall below the 7 percent threshold.¹⁰⁰

B. Analysis

We examine whether subject imports are negligible in any of the antidumping and countervailing duty investigations. As we explain below, we find that subject imports are not negligible in all investigations.¹⁰¹

Imports from nine of the 16 subject countries are above the statutory negligibility threshold of 3 percent. These subject countries, and their percentages of total imports for March 2019 through February 2020, the 12-month period preceding filing of the petitions, are as follows for the antidumping duty investigations: Bahrain (***) percent), Brazil (***) percent), Germany (***) percent), India (***) percent), Indonesia (***) percent), Oman (***) percent), South Africa (***) percent), Taiwan (***) percent), and Turkey (***) percent).¹⁰² In the three countervailing duty investigations, the percentages of total imports for March 2019 through February 2020 are as follows: Bahrain (***) percent), India (***) percent), and Turkey (***) percent).

Accordingly, we find that imports from these nine subject countries are not negligible for purposes of the antidumping duty investigations on the aforementioned countries: Bahrain, Brazil, Germany, India, Indonesia, Oman, South Africa, Taiwan, and Turkey, and the countervailing duty investigations concerning CAAS from Bahrain, India, and Turkey.

Seven of the 16 subject countries are below the 3 percent individual subject country statutory negligibility threshold applicable to antidumping duty investigations, and none of these involve countervailing duty investigations. These subject countries, and their percentages of total imports for March 2019 through February 2020 are as follows: Croatia (0.9 percent), Egypt (***) percent), Italy (***) percent), Romania (***) percent), Serbia (***) percent), Slovenia

¹⁰⁰ Baux's Posthearing Brief at 2-3. AKG argues that imports from Romania were under 3 percent as well during the relevant period but does not address the aggregation of otherwise negligible subject imports. AKG's Posthearing Brief at 20.

¹⁰¹ After termination of the three investigations noted above with respect to Brazil (countervailing duty), Greece (antidumping duty), and Korea (antidumping duty), there are antidumping duty investigations on 16 countries and countervailing duty investigations on three countries: Bahrain, India, and Turkey. Although subject imports from Turkey in the countervailing duty investigation are below 4 percent, such imports are over 3 percent and Turkey is not a developing country in which the 4 percent threshold would apply. See *Designations of Developing and Least-Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613, 7615-16 (USTR Feb. 10, 2020).

¹⁰² CR/PR at Table IV-8. Table IV-8 is based on official import statistics and data submitted in response to Commission questionnaires.

(*** percent), and Spain (***) percent).¹⁰³ The aggregate percentage of total imports from these seven countries is *** percent.¹⁰⁴ Because this exceeds the 7 percent statutory threshold pertinent to aggregated imports from individually negligible sources, we find that subject imports are not negligible for purposes of the antidumping duty investigations on CAAS from Croatia, Egypt, Italy, Romania, Serbia, Slovenia, and Spain. Thus, we conclude that subject imports are not negligible in any of the subject investigations.¹⁰⁵

V. Cumulation

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.¹⁰⁶

¹⁰³ CR/PR at Table IV-8.

¹⁰⁴ CR/PR at Table IV-8.

¹⁰⁵ While respondents address negligibility, no respondent argues that subject imports from a particular country are not eligible to be aggregated if they are under 3 percent.

¹⁰⁶ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.¹⁰⁷ Only a “reasonable overlap” of competition is required.¹⁰⁸

A. Arguments of the Parties

Petitioners’ Arguments. Petitioners argue that there is a reasonable overlap of competition because subject imports compete directly with each other and with the domestic like product. They assert that producers, importers, and purchasers generally reported that subject imports and the domestic product are used interchangeably and that nonprice differences are “never” or only “sometimes” not significant.¹⁰⁹ Petitioners maintain that substantial quantities of CAAS from all subject countries and domestically produced CAAS compete in the majority of regions of the United States, are sold through the same channels of distribution, and were present in the U.S. market during parts of 2018, 2019, and interim 2020.¹¹⁰

Petitioners assert the record does not support OARC’s argument that subject imports from Oman should not be cumulated because they are re-roll rather than CAAS and therefore differ from imports from other subject countries. They observe that the majority of Oman’s exports to the United States consist of finished CAAS and not re-roll.¹¹¹

Respondents’ Arguments. OARC argues that subject imports from Oman should not be cumulated because they play a complementary roll in the U.S. market and do not compete with domestically produced CAAS. It asserts that re-roll products imported from Oman are unavailable from domestic sources and are sold to a limited number of customers who further process re-roll into finished CAAS products. Finally, it claims the lack of competition of re-roll

¹⁰⁷ See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹⁰⁸ The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (citing *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902); see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

¹⁰⁹ Petitioners’ Prehearing Brief at 18-22.

¹¹⁰ Petitioners’ Prehearing Brief at 20-22.

¹¹¹ Petitioners’ Posthearing Brief, Exhibit 1 at 100-102.

from Oman is demonstrated by the absence of shipments of domestically produced CAAS meeting the Commission's pricing products.¹¹²

AKG asserts that the respondents in these investigations are located in diverse countries, both geographically and in their level of economic development. It maintains that there is no evidence that the subject imports are the same type of CAAS, sold to the same ports or regions, in the same time period, or in similar channels of distribution. On this basis, AKG concludes that cumulation is inappropriate in these investigations.¹¹³

B. Analysis and Conclusion

Petitioners filed the antidumping and countervailing duty petitions with respect to all subject countries on the same day, March 9, 2020.¹¹⁴ As explained below, we find a reasonable overlap of competition between subject imports from the 16 subject countries, and between subject imports from each source and the domestic like product.

Fungibility. CAAS is typically produced to certain specifications that include alloy series, temper designations, thickness, and width.¹¹⁵ CAAS may also be produced to the requirements of various international standard specifications, including, but not limited to, the ASTM International Standard B209-14 for aluminum and aluminum alloy sheet and plate.¹¹⁶

Market participants' questionnaire responses indicate that CAAS from domestic and subject sources are used interchangeably. When comparing the domestic product to the subject imports from each country, a majority of responding U.S. producers, importers, and purchasers reported that the domestic product and imports from each subject source are "always" or "frequently" used interchangeably.¹¹⁷

For comparisons between imports from subject sources, all responding U.S. producers indicated that CAAS from each subject source is "always" used interchangeably with CAAS from every other subject source.¹¹⁸ Moreover, the great majority of importers indicated that CAAS from each subject source was "always" or "frequently" used interchangeably with CAAS from

¹¹² OARC's Prehearing Brief at 17-19 and Exhibit 1.

¹¹³ AKG's Posthearing Brief at 6-7. It highlights as an example subject imports from Romania, which it claims are entirely "3003 alloy clad with 4045 and 4004 alloy."

¹¹⁴ CR/PR at I-1.

¹¹⁵ CR/PR at I-19.

¹¹⁶ CR/PR at I-21.

¹¹⁷ See CR/PR at Table II-11. Purchasers did not provide responses with respect to CAAS from Taiwan. *Id.*

¹¹⁸ See CR/PR at Table G-1.

other subject sources.¹¹⁹ Purchasers also generally reported that CAAS from each subject source was “always” or “frequently” used interchangeably with CAAS from other subject sources although there were a handful of exceptions.¹²⁰ Of 120 comparisons between CAAS from subject sources, a majority of purchasers indicated that the two subject sources are “always” or “frequently” used interchangeably for all but eight comparisons.¹²¹

In addition, virtually all U.S. producers reported that there are “never” significant differences other than price between subject imports and domestically produced CAAS and between imports from different subject countries.¹²² U.S. importers and purchasers generally indicated that there are “sometimes” or “never” significant differences other than price between subject imports and domestically produced CAAS and between imports from different subject countries.¹²³

In comparisons between products from different sources concerning 17 purchasing factors, purchasers reported that U.S. and subject CAAS were comparable on the majority of factors.¹²⁴ Domestically produced CAAS was, however, rated as superior for delivery time in several instances when compared to CAAS from subject countries, and domestically produced CAAS was also rated as superior compared to subject sources in a more limited number of

¹¹⁹ See CR/PR at Table G-1.

¹²⁰ See CR/PR at Table G-1.

¹²¹ See CR/PR at Table G-1. When comparing CAAS from Bahrain with that from Turkey, a majority of purchasers indicated that the CAAS from these countries was “sometimes” or “never” used interchangeably though a sizable minority (three of seven) indicated they are “always” used interchangeably. When comparing CAAS from Bahrain with that from Slovenia, half of the purchasers indicated that the CAAS from these two countries was “always” used interchangeably and half indicated that it is “sometimes” used interchangeably. When comparing CAAS from Brazil with that from Turkey, over half of the purchasers indicated that the CAAS from these two countries was “sometimes” used interchangeably; the remainder indicated that it is “always” used interchangeably. Further, when comparing CAAS from Spain with that from Bahrain, Egypt, India or Romania, half of the purchasers indicated CAAS products from the sources were “always” or “frequently” used interchangeably and half indicated they are “sometimes” used interchangeably. Over half of the purchasers responding also indicated that CAAS from Spain is “sometimes” used interchangeably with that from Indonesia though a sizable minority (three of seven) indicated they are “always” used interchangeably. *Id.* There were also 14 comparisons for which no purchaser rated the interchangeability of imports from the two subject sources.

¹²² See CR/PR at Tables II-13 and G-2.

¹²³ See CR/PR at Table II-13 and G-2. There were 13 comparisons for which no purchaser rated the importance of factors other than price for imports from the two subject sources.

¹²⁴ See CR/PR at Table II-10.

instances for availability, delivery terms, payment terms, price, product range, reliability of supply, size range, and technical support.¹²⁵

The product mix of alloy type shipped by domestic producers and importers of subject merchandise also suggests that there is an overlap in the products being sold. The vast majority of reported U.S. shipments of U.S. producers were ***, accounting for *** percent and *** percent of total U.S. producer shipments, respectively during 2019.¹²⁶ Subject imports from each subject country were also primarily comprised of ***.¹²⁷ Moreover, the majority of shipments of the domestic product and subject imports from every subject country ***.¹²⁸ The record therefore does not support OARC's and AKG's arguments that subject imports from Oman and Romania differ from domestically produced CAAS or CAAS from other subject countries.¹²⁹

Channels of Distribution. Subject imports and the domestic like product shared the same general channels of distribution. During the period of investigation, domestic producers split their sales relatively evenly among distributors, converters, and end users while the transportation sector accounted for a smaller, though appreciable, portion of the industry's U.S. shipments.¹³⁰ More than half of U.S. shipments of subject imports were to distributors with smaller portions sold to other end users followed by converters.¹³¹ Although the concentration

¹²⁵ See CR/PR at Table II-10.

¹²⁶ CR/PR at Table IV-9. See also Fig. IV-4 and Table F-1.

¹²⁷ See CR/PR at Table IV-9. See also CR/PR at Table F-1.

¹²⁸ See CR/PR at Table IV-10.

¹²⁹ As the petitioners noted, subject imports from Oman mostly consisted of final temper CAAS and not re-roll. In 2019, *** percent of shipments of subject imports from Oman consisted of final temper CAAS. CR/PR at Table IV-10. Subject imports from Oman also were *** in 2019. CR/PR at Table IV-9. See also CR/PR at F-15. Thus, OARC's argument that subject imports from Oman differ from other CAAS in the U.S. market is misplaced as ***. Contrary to OARC's argument that its sales did not meet the pricing products, importers sold *** pounds of CAAS meeting pricing product 3. See CR/PR at Table V-9 and V-10. Pricing data reported by importers accounted for *** percent of importers' shipments of subject imports from Oman, exceeding the coverage of the pricing data for subject imports from Croatia and Germany. CR/PR at V-9.

Similarly, the record does not support AKG's claim that subject imports from Romania were only 3003 alloy clad with 4045 and 4004 alloy. AKG's Posthearing Brief at 8. The Commission's shipment data show that subject imports from Romania were often non-clad 5XXX series. See CR/PR at F-16.

¹³⁰ See CR/PR at Table II-2. The portion of the industry's U.S. shipments to the transportation sector ranged from *** percent in interim 2019 to *** percent in interim 2020. CR/PR at Table II-2. Transportation-related users of CAAS produce truck trailers, passenger cars and light trucks, and trucks and buses. CR/PR at I-21.

¹³¹ See CR/PR at Table II-2.

of subject imports in each channel of distribution varied by country, a substantial portion of subject imports from each subject source was sold to distributors.¹³²

Geographic Overlap. U.S. producers reported selling CAAS to all regions of the contiguous United States.¹³³ Likewise, importers sold imports from each subject country in all six regions, except for subject imports from Brazil which were sold in five regions.¹³⁴ Subject imports also entered at ports throughout the United States.¹³⁵ In 2019, official import statistics show that 60.4 percent of subject imports entered through the Eastern border of entry of the United States, followed by the Southern, Western, and Northern borders of entry with 16.3 percent, 15.7 percent, and 7.5 percent, respectively.¹³⁶

Simultaneous Presence in Market. The monthly import statistics indicate that U.S. imports of CAAS from each subject country were present during all 45 months of the POI, with the exception of Croatia (28 of 45 months), Egypt (28 of 45 months), Serbia (17 of 45 months), and Slovenia (30 of 45 months).¹³⁷

Conclusion. The information in the record indicates that imports from each subject country are fungible with the domestic like product and each other, that imports from each of the subject countries and the domestic like product are sold in similar channels of distribution, similar geographic markets, and have been simultaneously present in the U.S. market. As noted above, the record contradicts respondents' arguments that subject imports from Oman and Romania are not fungible with the domestic product or CAAS from other subject sources.

In light of the foregoing, we find that there is a reasonable overlap of competition between the domestic like product and imports from each subject country and among imports from each subject country and cumulate subject imports from all 16 countries for purposes of our analysis of present material injury.

¹³² See CR/PR at Table II-2. Subject imports from Oman were primarily sold to converters and other end users. *Id.* A more limited portion of subject imports from Oman than other subject countries was sold to distributors; however, the domestic product, and substantial quantities of subject imports from Oman as well as subject imports from Bahrain, Brazil, Croatia, Egypt, Germany, India, Italy, Romania, Serbia, Spain, and Turkey were also sold to end users during interim 2020. See CR/PR at Table II-2.

¹³³ CR/PR at Table II-3.

¹³⁴ CR/PR at Table II-3.

¹³⁵ CR/PR at IV-30, Table IV-11.

¹³⁶ CR/PR at IV-30, Table IV-11. Imports from some subject sources entered in relatively small volumes at certain borders of entry but there were substantial quantities from all subject sources entering at the eastern ports of entry. See CR/PR at Table IV-11.

¹³⁷ See CR/PR at Table IV-12.

VI. Material Injury by Reason of Subject Imports

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.¹³⁸ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.¹³⁹ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”¹⁴⁰ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.¹⁴¹ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁴²

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,¹⁴³ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.¹⁴⁴ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports

¹³⁸ 19 U.S.C. §§ 1671d(b), 1673d(b). The Trade Preferences Extension Act (“TPEA”) of 2015, Pub. L. 114-27, amended the provision of the Tariff Act pertaining to Commission determinations of material injury and threat of material injury by reason of subject imports in certain respects. We have applied these amendments in this investigation.

¹³⁹ 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

¹⁴⁰ 19 U.S.C. § 1677(7)(A).

¹⁴¹ 19 U.S.C. § 1677(7)(C)(iii).

¹⁴² 19 U.S.C. § 1677(7)(C)(iii).

¹⁴³ 19 U.S.C. §§ 1671d(a), 1673d(a).

¹⁴⁴ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.¹⁴⁵

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.¹⁴⁶ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.¹⁴⁷ Nor does

¹⁴⁵ The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. U.S. Int’l Trade Comm’n*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred “by reason of” the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. U.S. Int’l Trade Comm’n*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

¹⁴⁶ SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the Petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

¹⁴⁷ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have

the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.¹⁴⁸ It is clear that the existence of injury caused by other factors does not compel a negative determination.¹⁴⁹

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”¹⁵⁰ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”¹⁵¹ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”¹⁵²

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

¹⁴⁸ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

¹⁴⁹ *See Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

¹⁵⁰ *Mittal Steel*, 542 F.3d at 876 &78; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) (citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75.). In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

¹⁵¹ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

¹⁵² *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

evidence standard.¹⁵³ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.¹⁵⁴

B. Conditions of Competition

The following conditions of competition inform our analysis of whether there is material injury or threat of material injury by reason of subject imports.

1. Demand Conditions

CAAS is used in a wide variety of applications, principally in the construction, automotive, electrical, marine, and aerospace industries, which account for the vast majority of demand for CAAS.¹⁵⁵ End uses for CAAS include automotive body parts, tractor-trailers, gutters and down-spouts, building facades, street signs and license plates, electrical boxes, and kitchen appliances.¹⁵⁶ Demand for CAAS depends on demand for the end use products in which CAAS is incorporated.¹⁵⁷ The construction and automotive industries are the largest drivers of demand for CAAS.¹⁵⁸

A plurality of U.S. producers and purchasers reported an increase in U.S. demand for CAAS since January 1, 2017, while a slight plurality of importers reported that demand had fluctuated.¹⁵⁹ Apparent U.S. consumption of CAAS increased by *** percent over the first three years of the POI; it was *** short tons in 2017, *** short tons in 2018, and *** short tons in 2019.¹⁶⁰ It was *** short tons in interim 2019 and *** short tons in interim 2020.¹⁶¹ A virtual shutdown in automobile production during the second quarter of 2020 due to the COVID-19

¹⁵³ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

¹⁵⁴ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

¹⁵⁵ CR/PR at II-1.

¹⁵⁶ CR/PR at II-1 n.2, II-16 to II-17.

¹⁵⁷ CR/PR at II-16. Many U.S. producers and most importers and purchasers indicated that CAAS was not subject to business cycles, but some importers reported seasonality in the construction, irrigation, HVAC, and recreational vehicle markets, with strong demand during the spring and summer, and less demand during the fall and winter months. CR/PR at II-17.

¹⁵⁸ CR/PR at II-18.

¹⁵⁹ CR/PR at Table II-5.

¹⁶⁰ CR/PR at Table IV-13.

¹⁶¹ CR/PR at Table IV-13.

pandemic reportedly accounts for reduced apparent U.S. consumption of CAAS during interim 2020.¹⁶²

2. Supply Conditions

The domestic industry supplied the largest volume of CAAS to the U.S. market during the POI. Its market share increased from *** percent in 2017 to *** percent in 2018 before declining to *** percent in 2019.¹⁶³ The domestic industry increased its production capacity over the POI. After initially declining from *** short tons in 2017 to *** short tons in 2018, the industry's capacity increased to *** short tons in 2019.¹⁶⁴ Domestic producers' inventories of CAAS increased over the POI from *** short tons in 2017 to *** short tons in 2018, and then to *** short tons in 2019.¹⁶⁵

Four U.S. producers (***) reported capital expenditures for plant expansions, upgrades, or openings including ***, ***, ***, and ***. Five producers (***) reported production or employment curtailments, as well as shutdowns, ***.¹⁶⁶

Subject imports' share of apparent U.S. consumption increased over the POI as they became the second largest source of CAAS in the U.S. market in 2018. Subject imports' market share was *** percent in 2017, *** percent in 2018, and *** percent in 2019.¹⁶⁷

Nonsubject imports' share of apparent U.S. consumption declined over the POI. Their share was *** percent in 2017, *** percent in 2018, and *** percent in 2019.¹⁶⁸ The largest

¹⁶² CR/PR at II-18. As reflected in U.S. automobile production data, there was a brief shutdown in production in the spring of 2020. CR/PR at Fig. II-2.

¹⁶³ CR/PR at Table IV-14. The industry's market share was *** percent in interim 2019 and *** percent in interim 2020. *Id.*

¹⁶⁴ CR/PR at Table III-5. Its capacity was 1.41 million short tons in interim 2019 and 1.57 million short tons in interim 2020. *Id.*

¹⁶⁵ CR/PR at Tables III-9. Its inventories totaled 217,788 short tons in interim 2019 and 203,391 short tons in interim 2020. *Id.*

¹⁶⁶ CR/PR at Tables III-3 and III-4. There were two major acquisitions involving U.S. plants during the POI. Novelis acquired Aleris in April 2020 after Department of Justice approval and Arconic sold its aluminum rolling mill facility in Texarkana, Texas to Ta Chen in October 2018. *Id.*

¹⁶⁷ CR/PR at Table IV-14. Subject imports' market share was *** percent in interim 2019 and *** percent in interim 2020. *Id.* Importers' inventories of subject merchandise increased overall during the POI (2017-19), with inventories of subject imports increasing from *** short tons in 2017 to *** short tons in 2018, *** short tons in 2019, *** short tons in interim 2019 and *** short tons in interim 2020. CR/PR at Table VII-74.

¹⁶⁸ CR/PR at Table IV-14. Nonsubject imports' market share was *** percent in interim 2019 and *** percent in interim 2020. *Id.*

sources of nonsubject imports during the POI were China and Canada.¹⁶⁹ Imports of CAAS from China became subject to antidumping and countervailing duty orders issued in February 2019 as a result of investigations initiated in December 2017.¹⁷⁰ Notably, imports of CAAS from China, as a share of apparent U.S. consumption, decreased from *** percent in 2017 to *** percent in 2019.¹⁷¹

Additional tariffs of 10-percent *ad valorem* were imposed on certain aluminum products, including CAAS, in March 2018 under Section 232 of the Trade Expansion Act (“TEA”) of 1962.¹⁷² The Secretary of Commerce is authorized to grant exclusions from the duties if the Secretary determines the aluminum article for which the exclusion is requested is not “produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality.”¹⁷³ The parties disagree concerning the significance of requests filed with the Secretary of Commerce by domestic producers for exclusions from Section 232 duties for particular products.¹⁷⁴

¹⁶⁹ CR/PR at IV-6.

¹⁷⁰ CR/PR at I-6; CR/PR at II-1 n.7. *See also Common Alloy Aluminum Sheet from the People's Republic of China: Antidumping Duty Order*, 84 Fed. Reg. 2813 (Feb. 8, 2019); *Common Alloy Aluminum Sheet from the People's Republic of China: Countervailing Duty Order*, 84 Fed. Reg. 2157 (Feb. 6, 2019). In September 2019, imports of CAAS from China also became subject to an additional 15 percent *ad valorem* duty under Section 301 of the Trade Act of 1974 (“Section 301 duties”), 19 U.S.C. § 2411. CR/PR at I-18. On January 22, 2020, the rate of duty was modified to 7.5 percent *ad valorem*. *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 Fed. Reg. 3741 (Jan. 22, 2020).

¹⁷¹ CR/PR at Table IV-14. They accounted for *** percent of the U.S. market in interim 2019 and *** percent in interim 2020. *Id.*

¹⁷² CR/PR at II-2. Section 232 authorizes the Secretary of Commerce to conduct investigations to determine the effects of imports on the national security of the United States and authorizes the President to take action to restrict such imports. *See* 19 U.S.C. § 1862. The President announced tariffs of 10 percent *ad valorem* on U.S. imports of certain aluminum products, including CAAS, on March 8, 2018, effective on March 23, 2018. On March 22, 2018, the President temporarily suspended Section 232 tariffs on imports from Brazil, South Korea, and members of the European Union, including subject countries Croatia, Germany, Italy, Romania, Slovenia, and Spain. The suspension of tariffs on aluminum imports from South Korea lapsed on April 30, 2018, and the suspension of tariffs on Brazil and EU countries lapsed on May 31, 2018. The President suspended tariffs on imports of aluminum from Canada and Mexico on May 19, 2019. CR/PR at II-2 n.8.

¹⁷³ CR/PR at I-17, Appendix D.

¹⁷⁴ *See* CR/PR at I-17 and Appendix D. Respondents generally argue that the exclusion requests and accompanying attestations submitted by the petitioners and others show a lack of domestic supply of large volumes of CAAS products. *See, e.g.,* Joint Respondents’ Prehearing Brief at 47-54. Petitioners argue that most of the exclusion requests involve out-of-scope merchandise, were filed outside the POI, or were filed by importers and not the domestic industry. Petitioners’ Posthearing Brief, Exhibit 1 at 77-78. Petitioners assert that “exclusion requests are narrow in that they must identify a very specific

The majority of responding U.S. producers, importers, and purchasers indicated that the Section 232 tariffs had increased prices for CAAS but provided mixed responses regarding the Section 232 tariffs' effect on the supply of imported and domestically produced CAAS.¹⁷⁵ Purchasers reported being declined supply of CAAS during the POI from both domestic and foreign sources.¹⁷⁶

3. Substitutability and Other Conditions

There is a moderate-to-high degree of substitutability between domestically produced CAAS and CAAS imported from subject countries.¹⁷⁷ When comparing the domestic product to the subject imports from each country, a majority of responding U.S. producers, importers, and purchasers reported that the domestic product and imports from each subject source are "always" or "frequently" used interchangeably.¹⁷⁸ Domestically produced CAAS and subject imports were sold in overlapping alloy series during the POI.¹⁷⁹

Price is among the most important factors in purchasing decisions for CAAS. Purchasers most frequently cited quality, price, and availability as being among the three most important factors in purchasing decisions.¹⁸⁰ Forty of 51 purchasers indicated that price is "very" important in purchasing decisions.¹⁸¹ Virtually all U.S. producers reported that there are "never" significant differences other than price between subject imports and domestically produced CAAS.¹⁸² U.S. importers and purchasers were generally in agreement, indicating that

product and a specific volume of that product during a specific time period. As such, no exclusion request filed at any point during the Section 232 exclusion process is reflective of a systemic supply shortage." *Id.* at 82. Further, petitioners claim that the volumes requested in several of the exclusion requests are so large as to bear "no rational relation to any purported shortages in the U.S. market." *Id.* at 40.

¹⁷⁵ CR/PR at Table II-1.

¹⁷⁶ CR/PR at II-15. Reasons for declining to supply CAAS reported by U.S. producers and importers include antidumping and countervailing duties on China, the preliminary determination by Commerce regarding subject imports, COVID-related shutdowns, unplanned operation downtime, lack of U.S. capacity, unavailability of specific alloys, and an inability to meet time requirements. *Id.*

¹⁷⁷ CR/PR at II-20.

¹⁷⁸ See CR/PR at Table II-11. Purchasers did not provide responses with respect to CAAS from Taiwan. *Id.*

¹⁷⁹ CR/PR at Fig. IV-4, Table IV-9. The majority of imports from each subject country was also final temper CAAS. CR/PR at Fig. IV-5, Table IV-10.

¹⁸⁰ CR/PR at Table II-7.

¹⁸¹ See CR/PR at Table II-8.

¹⁸² See CR/PR at Tables II-13.

there are “sometimes” or “never” significant differences other than price between subject imports and domestically produced CAAS.¹⁸³

The primary raw materials used to manufacture CAAS are primary aluminum and aluminum sheet scrap.¹⁸⁴ Aluminum sheet scrap prices decreased by *** percent from January 2017 to May 2020.¹⁸⁵ Raw materials as a portion of the domestic industry’s average cost of goods sold (“COGS”) increased from *** percent in 2017 to *** percent in 2018 before declining to *** percent in 2019.¹⁸⁶

Domestic producers’ prices for CAAS consist of three components: an indexed price of aluminum such as the London Metal Exchange (“LME”) price for high-grade unwrought aluminum, the Midwest premium,¹⁸⁷ and a fabrication or conversion price.¹⁸⁸ Conversion or fabrication prices are the portion of CAAS prices subject to negotiation between buyers and sellers.¹⁸⁹ The LME plus Midwest premium for aluminum fluctuated over the POI, increasing irregularly until the middle of 2018 before decreasing until mid-2020 for an overall increase of *** percent from January 2017 to September 2020.¹⁹⁰ Domestic producers reported that their conversion prices rose from 2017 to 2019 but were lower in interim 2020 compared to interim 2019.¹⁹¹ Importers may include regional premiums in their CAAS prices rather than the Midwest premium.¹⁹²

U.S. producers’ shipments of domestically produced CAAS were sold primarily on the basis of annual and long-term contracts, with a smaller percentage being sold through spot sales and short-term contracts.¹⁹³ Most annual and long-term contracts are negotiated during

¹⁸³ See CR/PR at Table II-13.

¹⁸⁴ CR/PR at V-1. Other raw materials include the alloying metals. *Id.*

¹⁸⁵ CR/PR at V-3, Fig. V-3.

¹⁸⁶ CR/PR at Table VI-1. The ratio was *** percent in interim 2019 and *** percent in interim 2020.

¹⁸⁷ The Midwest premium is a published price figure based on physical spot deals, bids, and offers reported through a daily survey of spot buyers and sellers. It uses a representative sample of producers, traders, and different types of end users, and reflects both deliveries to a typical freight consumer in a broad U.S. Midwest region via truck or rail as well as the transaction costs. CR/PR at V-1 n.4 & V-5 n.9.

¹⁸⁸ CR/PR at V-1.

¹⁸⁹ CR/PR at V-5; Joint Respondents’ Prehearing Brief at 78.

¹⁹⁰ CR/PR at V-2; Fig. V-2.

¹⁹¹ See CR/PR at Table V-1.

¹⁹² CR/PR at V-1 n.5.

¹⁹³ CR/PR at Table V-3. During 2019, U.S. producers reported selling *** percent of their U.S. commercial shipments through annual contracts, *** percent through long-term contracts, *** percent on the spot market, and *** percent through short-term contracts. *Id.*

the fourth quarter for the following year, do not allow for price renegotiation over the duration of the contract, contain a contracted volume range, and are indexed to raw material and transaction costs (*e.g.*, LME plus Midwest premium).¹⁹⁴ U.S. importers' shipments of subject imports were sold primarily through spot sales and short-term contracts.¹⁹⁵ U.S. producers sold about equally to distributors, converters, and end users during the POI; U.S. importers sold subject imports primarily to distributors, and to a lesser extent other end users.¹⁹⁶ Several domestic producers directly imported CAAS from both subject and nonsubject sources during the POI.¹⁹⁷

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."¹⁹⁸

The volume of cumulated subject imports increased by *** percent from 2017 to 2019, increasing from *** short tons in 2017 to *** short tons in 2018 and *** short tons in 2019.¹⁹⁹ Subject imports totaled *** short tons in interim 2019 and *** short tons in interim 2020.²⁰⁰ The increase in cumulated subject imports between 2017 and 2019 largely offset the decline in imports of CAAS from China over that period.²⁰¹

As a share of apparent U.S. consumption, cumulated subject imports increased by more than *** percentage points from 2017 to 2019 - increasing from *** percent in 2017 to *** percent in 2018 and *** percent in 2019.²⁰² Their share was *** percent in interim 2019 and

¹⁹⁴ CR/PR at V-1, V-7 and Table V-3.

¹⁹⁵ CR/PR at Table V-3. During 2019, U.S. importers reported selling *** percent of their U.S. commercial shipments on the spot market, *** percent through short-term contracts, *** percent through annual contracts, and *** percent through long-term contracts. *Id.* Most responding U.S. importers reported that their contracts do not allow for price renegotiation, are fixed in quantity and price, and are indexed to raw materials. CR/PR at V-7.

¹⁹⁶ See CR/PR at Table II-2.

¹⁹⁷ See CR/PR at Tables III-10 and IV-3. As discussed above in section III.B, domestic producers' imports were typically further processed into downstream CAAS or other products. See CR/PR at III-20 and Table III-10. See also Petitioners' Posthearing Brief, Exhibit 1 at 87-94.

¹⁹⁸ 19 U.S.C. § 1677(7)(C)(i).

¹⁹⁹ CR/PR at Tables IV-2 and C-1a.

²⁰⁰ CR/PR at Tables IV-2 and C-1a.

²⁰¹ See CR/PR at Tables IV-2 and C-1a. Between 2017 and 2019, imports of CAAS from China declined by 341,613 short tons, while subject imports increased by *** short tons. *Id.*

²⁰² CR/PR at Tables IV-14 and C-1a.

*** percent in interim 2020.²⁰³ We find that the volume of cumulated subject imports, and the increase in that volume, were significant in both absolute terms and relative to consumption in the United States during the POI.²⁰⁴

D. Price Effects of Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.²⁰⁵

As addressed in section VI.B.3. above, the record indicates that there is a moderate-to-high degree of substitutability between domestically produced CAAS and the subject imports and that price is an important factor in purchases.

The Commission collected quarterly pricing data from U.S. producers and importers for total quantity and f.o.b. value of five CAAS products shipped to unrelated U.S. customers over the POI.²⁰⁶ Nine U.S. producers and 33 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.²⁰⁷

²⁰³ CR/PR at Tables IV-14 and C-1a.

²⁰⁴ Petitioners argue that the filing of the petitions in these investigations in March 2020 accounts for the decline in subject imports reflected in interim 2020 data. Petitioners' Prehearing Brief at 44-45. We note that a decline in the volume of subject imports began in mid-2019 but accelerated after the filing of the petitions. See CR/PR at IV-40 (Table IV-12), and Fig. IV-6.

²⁰⁵ 19 U.S.C. § 1677(7)(C)(ii).

²⁰⁶ The pricing products were as follows: (1) Product 1 – Alloy 3003, H-14 temper, 0.125" thick, 48" wide; (2) Product 2 – Alloy 5052, H-32 temper, 0.125" thick, 48" wide; (3) Product 3 – Alloy 3105, H-26 temper, 0.016" thick, 24" wide; (4) Product 4 – Alloy 3003, H-14 temper, 0.063" thick, 48" wide; and (5) Alloy 1350, F Temper, 0.125" thick, 50" wide. CR/PR at V-8 to V-9.

Subject imports from Oman were the only subject imports reported for pricing product 5 during the POI. There were no sales of domestic product that were reported for product 5. See CR/PR at Table V-8.

²⁰⁷ CR/PR at V-9. Pricing data reported by these firms accounted for approximately 3.6 percent of U.S. producers' U.S. shipments and 11.9 percent of U.S. shipments of subject imports in 2019. CR/PR at V-9.

Over the POI, cumulated subject imports undersold the domestic like product in 262 of 478 quarterly comparisons (54.8 percent), and oversold the domestic like product in the remaining 216 instances (45.1 percent).²⁰⁸ The reported quantity of subject imports that undersold the domestic like product during the POI was 196.3 million pounds; the overselling quantity during the POI was 69.4 million pounds.²⁰⁹ The quantity of subject imports associated with underselling comparisons represented 73.9 percent of the total quantity of subject imports for which pricing data were reported (265.7 million pounds).²¹⁰ Subject imports' margins of underselling averaged 10.2 percent and ranged up to 33.7 percent; overselling margins averaged 12.3 percent and ranged up to 74.2 percent.²¹¹ The underselling was concentrated in pricing product 2 and in 2019 when *** percent of the underselling (by quantity) occurred.²¹²

The Commission also collected information from purchasers concerning their purchases of the domestic product and subject imports. Of the 52 purchasers who responded to the final phase lost sales/lost revenue survey, 34 reported that they had purchased imports instead of U.S.-produced CAAS. Twenty-seven of these purchasers reported that subject import prices were lower than U.S.-produced product, and 13 of these purchasers reported that price was a primary reason for the decision to purchase subject imports rather than domestically produced product.²¹³ Nine of these 13 purchasers estimated that they had purchased *** short tons of imported CAAS from subject sources instead of domestically produced CAAS. These purchases are equivalent to *** percent of the 546,532 short tons of subject imports that those firms reported purchasing during the period of investigation.²¹⁴

In light of the importance of price in purchasing decisions for CAAS, the fact that the domestic like product and subject imports are moderately to highly substitutable, the preponderance of underselling by cumulated subject imports measured by both number of instances and volume, and the evidence of sales lost due to price and the U.S. market share gained by subject imports, we conclude based on the record in the final phase of these

²⁰⁸ CR/PR at Table V-10.

²⁰⁹ CR/PR at Table V-10.

²¹⁰ CR/PR at Table V-10.

²¹¹ CR/PR at Table V-10.

²¹² See CR/PR at Table V-10.

²¹³ CR/PR at V-45.

²¹⁴ See CR/PR at Tables V-11 and V-12. Further, of the 52 responding purchasers, 6 reported that U.S. producers had reduced prices by margins ranging from 7 to 25 percent in order to compete with lower-priced imports from the subject countries. See CR/PR at V-51.

investigations that there has been significant underselling of the domestic like product by the cumulated subject imports.^{215 216 217}

Further, due to the underselling by subject imports which enabled their growth in U.S. market share, the domestic industry was unable to gain much of the market share ceded by imports from China. Although imports from China largely exited the U.S. market following institution of antidumping and countervailing duty investigations and imposition of duties, the domestic industry gained only a slight *** percentage points of U.S. market share over the three full years of the POI.²¹⁸ Thus, the significant underselling also had the effect of preventing the domestic industry from increasing its market share following the investigation and

²¹⁵ By including a reference to market share, we do not intend to suggest that a loss of market share (or failure to gain market share) is necessary in order to find underselling significant. *See, e.g., Seamless Standard Line and Pressure Pipe from Czechia, Korea, Russia and Ukraine*, Inv. No. 701-TA-654-655 and 731-TA-1529-1532 (Final), USITC Pub. 5183 (Apr. 2021) (finding of significant underselling not based on market share shift); *Ultra-High Molecular Weight Polyethylene from Korea*, Inv. No. 731-TA-1474 (Final), USITC Pub. 5178 (Apr. 2021) at 21 (same).

²¹⁶ Commissioner Karpel notes that in these investigations, underselling led to a significant increase in subject imports' market share, and that fact informs her finding of significant underselling in these investigations. Commissioner Karpel further notes that whether underselling is "significant" is fact-specific to the particular investigation at issue.

²¹⁷ Respondents argue that the reported underselling should be given less weight because domestic producers (or their affiliates) were responsible for much of the underselling during the POI. They estimate that Ta Chen, the largest importer and affiliate of domestic producer Texarkana, accounted for *** percent of the underselling. We see no basis to give less weight to Ta Chen's underselling. The argument appears to be premised on the notion that importation of subject imports by an importer affiliated with a domestic producer cannot be injurious. However, there is no basis to conclude that subject imports imported by Ta Chen are less injurious to domestic producers than subject imports imported by other importers. A domestic producer witness testified at the hearing that "any import that is brought in in an unfairly traded manner... is injurious." Hearing Tr. at 116 (Stemple), 119 (Vrablec), 123-124 (Keown). Moreover, Ta Chen's chief executive explained that Ta Chen is a master distributor of CAAS, importing CAAS but also with its purchase of Texarkana planning to compete in the U.S. market with domestically produced CAAS, and that it was having difficulties selling higher-priced domestically-produced CAAS in the face of low-priced subject imports. *See* Tr. at 51-53 (Hsieh); Petitioners' Posthearing Brief, Exhibit 11 (Hsieh Declaration) at ¶¶ 5-6.

Joint Respondents also ask that the Commission disregard Texarkana's pricing data because its shipments were internal transfers and should not have been reported. Joint Respondents' Prehearing Brief at 6 n.6. We decline to accept Joint Respondents' invitation. Texarkana stated that its price data *** Texarkana Producer Questionnaire at IV-2d. As Texarkana's data was reported as arms-length third-party prices, we see no basis to exclude Texarkana's data.

²¹⁸ *See* CR/PR at Fig. IV-6, Tables IV-2 IV-14, and C-1a. The share of the U.S. market held by imports from China declined from *** percent in 2017 to *** percent in 2019, a decline of *** percentage points. The share of the U.S. market held by subject imports increased from *** percent in 2017 to *** percent in 2019, a gain of *** percentage points. *Id.*

imposition of orders on unfairly traded imports from China until interim 2020 when subject imports declined following the filing of the petitions in these investigations.

We have also considered price trends for the domestic like product and subject imports. Prices for the domestically produced pricing products generally increased from the first quarter of 2017 to the third quarter of 2020, with domestic price increases ranging from *** percent to *** percent.²¹⁹ Despite these overall increases, prices for the domestic product for each pricing product decreased from the second or third quarter of 2019 through the last quarter of 2019 and into interim 2020.²²⁰ The record indicates that the volume of shipments of subject imports, and the volume of underselling by subject imports, were at their greatest when the declines in domestic prices began in 2019.²²¹

In addition to the declines in absolute price levels as reflected in the pricing products, domestic producers reported that their conversion or fabrication prices in interim 2020, which were negotiated at the end of 2019, were lower than their conversion or fabrication prices in interim 2019.²²² As noted, conversion prices are the portion of prices subject to negotiation and represent an amount above raw material expenses (and the Midwest Premium) that firms obtain through contracts for sale of CAAS. Industry witnesses indicated that downward pricing pressure from subject imports in 2019 led to the decline in their contracted conversion prices in

²¹⁹ CR/PR at Table V-9. Over the POI, domestic prices increased by *** percent for Product 1, *** percent for Product 3, and *** percent for Product 4. Prices decreased by *** percent for Product 2, the product in which the underselling was concentrated. CR/PR at Table V-9. Over the POI, average subject import prices increased by *** percent for Product 1, *** percent for Product 2, *** percent for Product 3, and *** percent for Product 4. CR/PR at Table V-9.

²²⁰ CR/PR at Fig. V-9. Product 3 initially increased somewhat during early 2020 while pricing products 1, 2, and 4 experienced slight upticks later in 2020. *Id.*

²²¹ Although subject import volume peaked in the second quarter of 2019, underselling by volume was concentrated in the second, third, and fourth quarters of 2019. Derived from CR/PR Tables V-4 through V-8; CR/PR at IV-40. The share of shipments by volume that was undersold was *** percent in the 2nd Quarter of 2019, *** percent in the 3rd Quarter of 2019, *** percent in the 4th quarter of 2019 and *** percent in the 1st Quarter of 2020. Derived from CR/PR Tables V-4 through V-8.

²²² See CR/PR at Table V-1. The industry's average reported conversion price declined from \$*** per pound in interim 2019 to \$*** per pound in interim 2020. Likewise, the industry's effective conversion price (average sales value minus average raw material cost) was lower in interim 2020 at \$***, as compared to \$*** per pound in interim 2019. CR/PR at Table VI-1. Thus, by both measures, the domestic industry experienced reduced pricing in interim 2020 compared to interim 2019. The industry reported full-year conversion prices of \$*** per pound in 2017, \$*** per pound in 2018 and \$*** per pound in 2019. CR/PR at Table V-1. Its effective conversion price was \$*** per ton in 2017, \$*** per ton in 2018, and \$*** per ton in 2019. CR/PR at Table VI-1.

interim 2020.²²³ As noted above, the large majority of domestic products were sold via annual or long-term contracts, and prices for the majority of both these types of contracts were negotiated in the fourth quarter of the year for the following year.²²⁴ Thus, although demand weakened in interim 2020 due to COVID-related shutdowns, prices began to decline prior to that time and many contracts were negotiated and completed in 2019, when consumption increased and prior to the COVID pandemic. The record therefore indicates that subject imports' underselling and presence in the market materially contributed to price declines experienced by the domestic industry over the POI.²²⁵

In light of the declines in domestic CAAS prices in the latter part of 2019 and 2020 and the lower conversion prices in particular during interim 2020, we find that domestic prices have been depressed by low-priced subject imports to a significant degree.

We observe that the industry's COGS to net sales ratio declined over the first three years of the POI but then was higher in interim 2020 than interim 2019. The ratio declined from 93.7 percent in 2017 to 90.9 percent in 2018 and 87.6 percent in 2019. It was 85.7 percent in interim 2019 and 91.2 percent in interim 2020. The elevated ratio in interim 2020, despite lower unit COGS in 2020 than interim 2019, reflects the industry's depressed conversion prices in 2020.²²⁶

²²³ Hearing Tr. at 41-42, 84 (Stemple); 131 (McCarter); 49 (Ricci); 46 (Roush). In addition to the cited hearing testimony, industry executives from several producers provided declarations indicating that subject imports' pressure on prices led them to reduce their 2020 conversion prices. Petitioners' Prehearing Brief, Exhibit 2 at ¶ 4-12 (Vrablec Declaration), Exhibit 3 at ¶ 4-9 (Keown Declaration), Exhibit 4 at ¶¶ 3-11 (Ricci Declaration), Exhibit 12 at ¶¶ 2-8 (McCarter Declaration), Exhibit 13 at ¶¶ 7-11 (Stemple Declaration). *See also* Petitioners' Posthearing Brief, Exhibit 1 at 14-20. Market intelligence provided by *** also indicate that domestic CAAS prices faced downward pressure from an oversupply of subject imports during 2019. In particular, low prices and large volumes at distributors or depots were reported to be placing downward pressure on contract prices and leading purchasers to delay entering into contracts in hopes of obtaining even lower prices later. *See* Petitioners' Posthearing Brief, Exhibit 1 at 38-42. Importer inventories also increased from *** short tons in 2017 to *** short tons in 2019. CR/PR at Table VII-74. We thus reject Joint Respondents' argument that additional domestic capacity in 2019, rather than subject imports, accounts for depressed domestic prices in 2019 and interim 2020. *See* Joint Respondents' Final Comments at 8.

²²⁴ CR/PR at Tables V-3, V-7.

²²⁵ We note that domestic price declines began in 2019 rather than in 2020, so the COVID-related shutdowns in the second quarter of 2020, while disruptive, did not cause the price declines. *See* CR/PR at Fig. V-9; Petitioners' Confidential Hearing Presentation (March 1, 2021), Slides 19-20 (***). The shutdowns also did not have a lasting impact on the market. *See* CR/PR at II-18; Joint Respondents' Prehearing Brief at 32 n.94.

²²⁶ *See* CR/PR at Table VI-1.

As explained above, we find that the underselling by cumulated subject imports was significant. This significant underselling facilitated cumulated subject imports' capture of significant market share in the U.S. market and precluded the domestic industry from gaining more than *** percentage points of the market share ceded by imports from China. We further find that subject imports depressed prices to a significant degree. Accordingly, we conclude that cumulated subject imports had significant price effects on the domestic industry.

E. Impact of the Subject Imports²²⁷

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."²²⁸ These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single

²²⁷ The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at less value, Commerce found the following dumping margins: (1) Bahrain- 4.83 percent; (2) Brazil- (Companhia Brasileira de Alumínio 137.06 percent) and (Novelis do Brasil Ltda, 49.61 percent); (3) Croatia- 3.19 percent; (4) Egypt-12.11 percent; (5) Germany- (Hydro Aluminium Rolled Products GmbH, 242.80 percent) and (Novelis Deutschland GmbH and all others, 49.40 percent); (6) India- (Manaksia Aluminium Company Limited, zero percent) and (Hindalco Industries Limited and all others, 47.92 percent); (7) Indonesia- 32.12 percent; (8) Italy- (Profilglass S.p.A, 29.13 percent), (Laminazione Sottile S.p.A, zero percent), (all others, 14.57 percent); (9) Oman- 5.29 percent; (10) Romania-(Alro, SA, 37.26 percent) and (all others, 12.51 percent); (11) Serbia- (Otovici Doo, 25.84 percent) and (Impol Seval, a.d./Impol d.o.o., and all others, 11.67 percent); (12) Slovenia- 13.43 percent; (13) South Africa- 8.85 percent; (14) Spain- (Compania Valenciana de Alumínio Baux S.L.U. / Bancolor Baux S.L.U, 24.23 percent) and (Aludium Transformacion de Productos, S.L and all others, 3.80 percent); (15) Taiwan-17.50 percent; and (16) Turkey- (Assan Aluminyum Sanayi ve Ticaret A.S. (Assan), 2.02 percent), (Teknik Aluminyum Sanayi A.S. (Teknik), 13.56 percent), and (all others, 4.85 percent). CR/PR at Tables I-5 to I-22.

We take into account in our analysis the fact that Commerce has made final findings that all subject merchandise is dumped. In addition to this consideration, our analysis takes into account our prior findings that the subject imports undersold the domestic pricing products and significantly depressed the domestic industry's prices.

²²⁸ 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, 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 also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”²²⁹

During the POI, the domestic industry invested in additional production capacity to take advantage of the retreat from the U.S market of nonsubject imports from China and growing apparent U.S. consumption.²³⁰ The investments increased the domestic industry’s capacity by *** percent over the three full years of POI,²³¹ as a number of domestic producers reported greater production capacity and one domestic producer commenced production at a previously idled facility.²³²

Although virtually all of the domestic industry’s trade indicators increased, the increases were modest considering the large decline in imports from China and the *** percent increase in apparent U.S. consumption from 2017 to 2019.²³³ The domestic industry’s production increased by *** percent from 2017 to 2019, before declining to a level 13.3 percent lower in interim 2020 compared to interim 2019.²³⁴ The domestic industry’s capacity utilization rate declined overall, falling from *** percent in 2017 to *** percent in 2019.²³⁵ Its U.S. shipments (by quantity) increased by *** percent from 2017 to 2019, before showing a 9.7 percent decrease in the interim period comparison.²³⁶ The domestic industry’s market share increased by *** percentage points over the three full years of the POI, and then was *** percentage

²²⁹ 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the TPEA of 2015, Pub. L. 114-27.

²³⁰ Arconic’s investment and Texarkana’s new plant were the main sources of new capacity and these investments were dependent on new sales opportunities in the market due to the decline in nonsubject imports. Petitioners’ Posthearing Brief, Exhibit 4 (Vrablec Declaration) at ¶¶ 3-9; Hearing Tr. at 51 (Hsieh).

²³¹ See CR/PR at Table C-1a. Most of the domestic industry’s increased capacity was due to *** increase in 2019 following the imposition of the antidumping and countervailing duty orders on CAAS from China in February 2019. The domestic industry’s capacity decreased from *** short tons in 2017 to *** short tons in 2018, but then increased to *** short tons in 2019. CR/PR at Tables III-5 and C-1a. The industry’s capacity was 1.41 million short tons in interim 2019 and 1.57 million short tons in interim 2020. *Id.*

²³² *** each increased their capacity during the POI and Texarkana started up a previously idled plant. See CR/PR at Table III-5.

²³³ Imports of CAAS from China decreased by approximately 340,000 short tons or 87.4 percent by quantity from 2017 to 2019. CR/PR at Table C-1a.

²³⁴ The domestic industry’s production increased from *** short tons in 2017 to *** short tons in 2018 and *** short tons in 2019. CR/PR at Tables III-5 and C-1a. It was 1.05 million short tons in interim 2019 and 912 thousand short tons in interim 2020. *Id.*

²³⁵ The domestic industry’s capacity utilization increased from *** percent in 2017 to *** percent in 2018, before declining to *** percent in 2019. CR/PR at Tables III-5 and C-1a. It was 74.6 percent in interim 2019 and 58.3 percent in interim 2020. *Id.*

²³⁶ The domestic industry’s U.S. shipments increased from *** short tons in 2017 to *** short tons in 2018 and *** short tons in 2019. CR/PR at Tables III-7 and C-1a.

points higher in interim 2020 than interim 2019 as subject imports continued to decline in 2020 after the filing of the petitions.²³⁷ Its end-of-period inventories increased by *** percent from 2017 to 2019, though they were lower in September 2020 than September 2019, while end-of-period inventories as a share of total shipments increased by *** percentage points from 2017 to 2019.²³⁸

The domestic industry's financial indicators showed improvement overall from 2017 to 2019, before deteriorating in interim 2020 compared to interim 2019. From 2017 to 2019, sales revenues²³⁹ and gross profit²⁴⁰ both increased, reflecting increasing sales volumes and prices.²⁴¹ Operating income²⁴² and net income both increased until interim 2020.²⁴³ Its operating income to net sales ratio increased from *** percent in 2017 to *** percent in 2018 and *** percent in 2019.²⁴⁴ The domestic industry's net income ratio followed a similar trend over the POI.²⁴⁵ In interim 2019, three firms reported operating and net losses, but five firms reported operating losses and six firms reported net losses in interim 2020.²⁴⁶ The industry's poor financial

²³⁷ See CR/PR at Tables IV-14 and C-1a.

²³⁸ The domestic industry's end-of-period inventories increased from *** short tons in 2017 to *** short tons in 2018 and *** short tons in 2019. CR/PR at Tables III-9 and C-1a. They were 217,788 short tons in interim 2019 and 203,391 short tons in interim 2020. The domestic industry's end-of-period inventories as a share of total shipments increased from *** percent in 2017 to *** percent in 2018 and *** percent in 2019. *Id.* The ratio was 15.4 percent in interim 2019 and 16.1 percent in interim 2020.

²³⁹ The domestic industry's net sales revenues increased from \$*** in 2017 to \$*** in 2018, and \$*** in 2019. They were \$3.53 billion in interim 2019 and \$2.73 billion in interim 2020. CR/PR at Tables VI-1 and C-1a.

²⁴⁰ The domestic industry's gross profits increased from \$*** in 2017 to \$*** in 2018 and \$*** in 2019. CR/PR at Tables VI-1 and C-1a. They were \$503.19 million in interim 2019 and \$241.13 million in interim 2020. CR/PR at Tables VI-1 and C-1a.

²⁴¹ Conversion prices and effective conversion prices increased over the first three years of the POI. See CR/PR at Table V-1 and VI-1.

²⁴² The domestic industry's operating income increased from \$*** in 2017 to \$*** in 2018 and \$*** in 2019. CR/PR at Tables VI-1 and C-1a. It was \$326.19 million in interim 2019 and \$67.58 million in interim 2020. *Id.*

²⁴³ After a net loss of \$*** in 2017, the domestic industry reported net income of \$*** in 2018 and \$*** in 2019. CR/PR at Tables VI-1 and C-1a. Net income was \$196.04 million in interim 2019, but the industry had a net loss of \$5.06 million in interim 2020.

²⁴⁴ CR/PR at Tables VI-1 and C-1a. The domestic industry's operating income to sales ratio was 9.2 percent in interim 2019 and 2.5 percent in interim 2020. *Id.*

²⁴⁵ CR/PR at Tables VI-1 and C-1a. The domestic industry's net income to sales ratio increased from *** percent in 2017 to *** percent in 2018 and *** percent in 2019. *Id.* The industry's net income ratio was 5.6 percent in interim 2019 and negative 0.2 percent in interim 2020. *Id.*

²⁴⁶ See CR/PR at Table VI-1.

performance in interim 2020 was due both to lower conversion prices and reduced sales volume as apparent U.S. consumption fell *** percent compared to interim 2019.²⁴⁷

The number of production-related workers declined over the POI, but most of the domestic industry's employment-related indicators increased before reflecting declines in the interim period comparison.²⁴⁸ Total hours worked,²⁴⁹ hours worked per PRW,²⁵⁰ total wages paid,²⁵¹ and productivity²⁵² all increased overall from 2017 to 2019 and then were lower in interim 2020 than in interim 2019; unit labor costs²⁵³ and hourly wages²⁵⁴ were higher in interim 2020 than in interim 2019. The domestic industry reported increasing capital expenditures and research and development (R&D) expenses over the first three years of POI, but both were lower in interim 2020 compared to interim 2019.²⁵⁵

Thus, the record shows that while trends in the domestic industry's trade and financial performance were generally positive from 2017 to 2019, subject imports prevented the domestic industry from further benefitting from the imposition of antidumping and countervailing duty orders on imports of CAAS from China over the full years of the POI. Given

²⁴⁷ See CR/PR at Tables V-1, VI-1, VI-3, and C-1a.

²⁴⁸ The number of production-related workers ("PRWs") decreased from *** PRWs in 2017 to *** PRWs in 2018 and then *** PRWs in 2019. CR/PR at Tables III-13 and C-1s. PRWs were 5,148 in interim 2019 and 4,857 in interim 2020. *Id.*

²⁴⁹ Total hours worked increased from *** in 2017 to *** in 2018 and then declined to *** in 2019. CR/PR at Tables III-13 and C-1a. They were 8.87 million in interim 2019 and 7.91 million in interim 2020. *Id.*

²⁵⁰ Hours worked per PRW increased from *** per PRW in 2017 to *** per PRW in 2018 and *** per PRW in 2019. CR/PR at Tables III-13 and C-1a. They were 1,723 in interim 2019 and 1,628 in interim 2020. *Id.*

²⁵¹ Wages paid increased from \$*** in 2017 to \$*** in 2018 and \$*** in 2019. CR/PR at Tables III-13 and C-1a. They were \$269.54 million in interim 2019 and \$250.21 million in interim 2020. *Id.*

²⁵² Productivity in short tons per 1,000 hours improved from *** in 2017 to *** in 2018 and then *** in 2019. CR/PR at Tables III-13 and C-1a. It was 118.7 in interim 2019 and 115.4 in interim 2020. *Id.*

²⁵³ Unit labor costs in dollars per short ton decreased from \$*** in 2017 to \$*** in 2018 and then \$*** in 2019. CR/PR at Tables III-13 and C-1a. They were \$256 in interim 2019 and \$274 in interim 2020.

²⁵⁴ Hourly wages increased from \$*** per hour in 2017, to \$*** per hour in 2018, and \$*** per hour in 2019. CR/PR at Tables III-13 and C-1a. They were \$30.38 in interim 2019 and \$31.64 in interim 2020. *Id.*

²⁵⁵ Domestic capital expenditures totaled \$*** in 2017, \$*** in 2018, and \$*** in 2019. CR/PR at Tables VI-5 and C-1a. Domestic capital expenditures were \$230.56 million in interim 2019 and \$138.78 million interim 2020. *Id.* Spending on R&D was \$*** in 2017, \$*** in 2018, and \$*** in 2019. *Id.* Spending on R&D was \$10.86 million in interim 2019 and \$6.54 million in interim 2020. *Id.* Total assets and return on total assets increased over the first three years as well. See CR/PR at Table VI-7.

the large decline in imports from China, the domestic industry could have reasonably expected to increase its production, sales, shipments, and market share by a materially greater amount from 2017 to 2019 if not for the increase in low-priced subject imports that undersold the domestic like product and captured *** percentage points of market share in the U.S. market.²⁵⁶

In interim 2020 compared to interim 2019, the industry experienced lower prices due to the price depressing effects of subject imports on contracted conversion prices, as well as reduced output due to lower apparent U.S. consumption due to COVID-related shutdowns.²⁵⁷ Both depressed prices and reduced sales volumes contributed to lower profits and operating income in interim 2020 compared to interim 2019.²⁵⁸ As a result, the industry reported much lower output, sales, revenues, profits and income in interim 2020.²⁵⁹

Respondents argue that the domestic industry was unable to increase production in 2019 due to capacity limitations.²⁶⁰ Respondents also claim that shortages in the market were confirmed by purchasers and shown by the large number of requests for exclusion from Section 232 duties filed by domestic producers.²⁶¹ However, we find that there were no widespread

²⁵⁶ The industry increased its U.S. shipments by *** percent or *** short tons from 2017 to 2019 but given the far larger decline in imports from China of approximately 340,000 short tons, we would have expected the industry to increase its shipments and market share by a greater amount.

²⁵⁷ See CR/PR at VI-19 and VI-19 n.17; CR/PR at Table C-1a.

²⁵⁸ See CR/PR at Table VI-3, VI-2 n.6. Joint Respondents' argument that the industry's conversion price remained high in interim 2020 is misplaced given the effect lower conversion prices had on the industry's revenues, profits, and income during that period. See Joint Respondents' Final Comments at 10.

²⁵⁹ We note that virtually all domestic producers reported significant negative effects on investment, growth, and development due to subject imports during the POI. See CR/PR at Tables VI-8 and VI-9. For example, ***. CR/PR at Table VI-9.

²⁶⁰ See, e.g., Joint Respondents' Prehearing Brief at 15-20; Joint Respondents' Final Comments at 1-4. Respondents question the domestic industry's allocations of capacity between in-scope and out-of-scope products, but we disagree with this assessment of the evidence concerning the domestic industry's capacity. Petitioners have documented the capacity increases and allocations with explanations in sworn declarations from company executives. Petitioners have also identified the investments by *** that resulted in increases in capacity in 2019. See Petitioners' Posthearing Brief, Exhibit 1 at 61-64, Exhibit 4 (Vrablec Declaration) ¶¶ 3-9 Exhibit 1 (Hsieh Declaration) ¶15. Petitioners have also explained the more modest capacity increases of certain other domestic producers. See *Id.* at Exhibit 3 (Keown Declaration) at ¶ 2 (discussion of Commonwealth's investment) and Exhibit 14 (Stemple Declaration) at ¶ 2 (discussion of Constellium's capacity). Petitioners also explained the reason that *** reallocated capacity in response to a staff request; some CAAS capacity ***. Petitioners' Posthearing Brief, Exhibit 1 at 63-64.

²⁶¹ The exclusions permit importers to obtain CAAS free from the section 232 duties. CR/PR at I-17. The vast majority of the *** exclusions requested by the domestic industry were Novelis' exclusion

shortages, but rather, the domestic market became oversupplied as the POI progressed.²⁶² We also observe that the domestic industry's and importers' increasing inventories is inconsistent with respondents' argument, as is the extent to which cumulated subject imports undersold domestic products in the U.S. market. Finally, we disagree with respondents' claim that there is no correlation between the increase in subject imports and that the industry's improvement over much of the POI forecloses an affirmative determination.²⁶³ The improvement in trade and financial indicators from 2017 to 2019 resulted from modestly increased sales volume and initially higher prices.²⁶⁴ We note that the improvements registered by the domestic industry are relative to the already diminished level at which it began the investigation period in 2017, when the domestic industry was experiencing the injurious effects of dumped and subsidized nonsubject imports from China.²⁶⁵ As explained above, however, the industry's performance would have been materially better during those three years if not for the increasing volume of low-priced subject imports that dramatically increased their market share following investigation and imposition of antidumping and countervailing duty orders on CAAS from

requests so that an intermediate product manufactured in Novelis' Oswego, NY facility, and exported for cold-rolling at Novelis' affiliated production facility in Kingston, Ontario, could subsequently be sent back to the United States for sales to Novelis' customers. See Petitioners' Posthearing Brief, Exhibit 10 (Ricci Declaration) at ¶¶ 8-11. Further, the volume of requested and/or granted exclusions far exceeds apparent U.S. consumption in the market, so the volume of requests bears little relation to actual imports. See CR/PR at Tables C-1 and D-4. The fact that importers submitted many requests or the domestic industry did not object to the requests, does not indicate that imports were needed to supply the domestic market. As the petitioners note, the requests highlighted by respondents often are for small volumes, for out-of-scope products, or to facilitate the importation of CAAS from less expensive sources. See Petitioners' Posthearing Brief, Exhibit 1 at 77-79.

²⁶² Respondents claim that purchasers, importers, and the trade press indicated that there were shortages and that subject imports were needed in the market. Joint Respondents' Prehearing Brief at 20-34. However, reports in trade publications, ***, confirm that the CAAS market became oversupplied starting in mid-2019 with imports in importers' inventories and at service centers. See Petitioners' Posthearing Brief, Answers to Questions at 38-42, Exhibit 4 (Vrablec Declaration), Attachment 4. Regardless of importers' and purchasers' perceptions of supply earlier in the POI, inventories became elevated during 2019. For instance, ***. See *** (quoted in Joint Respondents' Prehearing Brief at 32-33).

²⁶³ Respondents contend that there is no causal link between the increase in subject imports, the industry's conversion prices or its finances and that the improvement by the domestic industry over 2017-2019 compels a negative determination. Joint Respondents' Prehearing Brief at 86-100; Alro's Prehearing Brief at 9-12; Joint Final Comments at 11-13.

²⁶⁴ As noted, the industry's conversion prices and net sales values generally increased from 2017 to 2019. CR/PR at Tables V-1 and VI-1.

²⁶⁵ See *CAAS from China*, USITC Pub. 4861, at 29-30.

China, a material portion of which the domestic industry could have served, particularly as imports from China substantially exited the market as a result of the investigations and orders imposed on imports from that country.²⁶⁶ Further, while subject imports were lower in interim 2020 than in interim 2019, we have found that cumulated subject imports depressed conversion prices for interim 2020 when contracts were entered into at the end of 2019.

We also have considered the role of factors other than subject imports to ensure that we are not attributing injury from such other factors to subject imports. As discussed above, the growth in apparent U.S. consumption from 2017 to 2019 does not explain the industry's inability to achieve materially greater output during those three years. Further, we have explained that lower apparent U.S. consumption during interim 2020 reduced the output and revenues of the domestic industry during the period, but the lower conversion prices due to low-priced subject imports also had material effects on the domestic industry's prices, revenues, profits and income during interim 2020.

We have also considered the role of nonsubject imports in the U.S. market. As described earlier, nonsubject imports' share of apparent U.S. consumption decreased from *** percent in 2017 to *** percent in 2018, *** percent in 2019, *** percent in interim 2019, and *** percent in interim 2020.²⁶⁷ Thus, any impact on the domestic industry's condition also does not appear to be explained by nonsubject imports. In light of these considerations and the substantial volumes and substantial increase in volumes of cumulated subject imports and their pervasive underselling, nonsubject imports cannot explain the magnitude of the domestic industry's inability to achieve materially greater output, market share, revenues, profits, and income.

²⁶⁶ We observe that the TPEA of 2015 added to the statute a provision stating that the existence of a profitable industry, or one whose performance has improved, does not foreclose an affirmative material injury determination. See 19 U.S.C. § 1677(7)(J); see also *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Pub. 4638 at 44 n.219 (Sept. 2016); *Cold-Rolled Steel Flat Products from Brazil, India, Korea, Russia, and the United Kingdom*, Inv. Nos. 701-TA-540, 542-544 and 731-TA-1283, 1285, 1287, and 1289-1290 (Final), USITC Pub. 4637 at 35 n.182 (Sept. 2016).

²⁶⁷ CR/PR at Table IV-14. The Commission also obtained price data for nonsubject imports from Canada, Greece, and Korea. See CR/PR at H-3 and Table H-4. The data indicate that prices for products imported from nonsubject sources were lower than U.S. prices in 30 of 56 instances, and higher than U.S. prices in the remaining 26 instances. In comparing nonsubject country pricing data with subject country pricing data, prices for product imported from nonsubject sources were higher than prices for product imported from subject countries in 32 of 56 instances and lower in the 24 remaining instances. See CR/PR at H-3 and Table H-4.

We therefore find that cumulated subject imports had a significant impact on the domestic industry.

VII. Critical Circumstances

A. Legal Standards

Commerce has made affirmative critical circumstances findings in the antidumping duty investigation with respect to all CAAS from Indonesia and the countervailing duty investigation with respect to certain imports of CAAS from Turkey.²⁶⁸ Because we have determined that the domestic industry is materially injured by reason of cumulated subject imports, we must further determine “whether the imports subject to the affirmative {Commerce critical circumstances} determination{s} . . . are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued.”²⁶⁹

The SAA indicates that the Commission is to determine “whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order” and specifically “whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order.”²⁷⁰ The legislative history for the critical circumstances provision indicates that the provision was designed “to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}.”²⁷¹ An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to Commerce’s affirmative critical circumstances determination for a period 90 days prior to the suspension of liquidation.²⁷²

²⁶⁸ *Common Alloy Aluminum Sheet From Indonesia: Final Determination of Sales at Less Than Fair Value, and Final Affirmative Finding of Critical Circumstances*, 86 Fed Reg. 13304, 13304 (Mar. 8, 2021); *Common Alloy Aluminum Sheet From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 86 Fed Reg. 13315, 13316 (Mar. 8, 2021).

²⁶⁹ 19 U.S.C. §§ 1671d(b)(4)(A)(i), 1673d(b)(4)(A)(i); 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii); 19 U.S.C. §§ 1671d(e)(2), 1673d(e)(2).

²⁷⁰ SAA at 877.

²⁷¹ *ICC Industries, Inc. v. United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 317, 96th Cong., 1st Sess. 63 (1979), *aff’g*, 632 F. Supp. 36 (Ct. Int’l Trade 1986).

²⁷² See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant –

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.²⁷³

In considering the timing and volume of subject imports, the Commission's practice is to compare import quantities in a period prior to the filing of the petition with those in a period subsequent to the filing of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstance determination.²⁷⁴

B. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that affirmative critical circumstances findings in the antidumping duty investigation with respect to Indonesia and the countervailing duty investigation with respect to Turkey are warranted. They urge the Commission to use shorter comparison periods in these investigations: four months for Indonesia and two months for Turkey. Petitioners argue that these shorter comparison periods will accurately capture the surge in imports of subject merchandise that reflects the subject producers and exporters behaving exactly as might be expected in order to avoid the potential retroactive assessment of unfair trade duties.²⁷⁵

Petitioners also argue that affirmative critical circumstances findings by the Commission are supported by factors that include a highly vulnerable domestic industry and the additional injury resulting from the large volume of subject imports that entered the United States in the months after the petitions were filed.²⁷⁶

Respondents' Arguments. Turkish Producers and Exporters argue that the record does not warrant a finding that critical circumstances exist with respect to Turkey.²⁷⁷ They assert

²⁷³ 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

²⁷⁴ See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442- 443, 731-TA-1095- 1097 (Final), USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 & 731-TA-1060- 1061 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

²⁷⁵ Petitioners' Prehearing Brief at 99-100 (quoting *Synthetic Indigo from China*, USITC Pub. 3310 (Final) (June 2000) at 14-15.

²⁷⁶ Petitioners' Prehearing Brief at 102-03.

that export-related subsidies only constituted a small fraction of the subsidy rate and a negative critical circumstances determination would not seriously undermine the remedial effect of the countervailing duty order. They also contend that subject imports from Turkey, as well as importers' inventories of those imports, subject to Commerce's affirmative critical circumstances determination decreased in the post-petition period.²⁷⁸

C. Analysis

In these investigations, Commerce made affirmative critical circumstances findings in the antidumping duty investigation with respect to all CAAS from Indonesia and the countervailing duty investigation with respect to imports from one producer/exporter, Assan Alüminyum Sanayi ve Ticaret A.Ş., in Turkey.²⁷⁹ We first consider the appropriate period for comparison of pre-petition and post-petition levels of the imports subject to the affirmative critical circumstances findings. While the Commission typically considers six-month periods, it has relied on a shorter comparison period when Commerce's preliminary determination falls within the six months after a petition was filed.²⁸⁰ We observe that Commerce did not issue its preliminary determinations in its antidumping and countervailing duty investigations simultaneously; its preliminary countervailing duty determination concerning imports from Turkey was issued on August 14, 2020, and was within the sixth-month (March-August 2020) post-petition period.²⁸¹ Because Commerce's preliminary countervailing duty determination

²⁷⁷ Turkish Producers and Exporters' Prehearing Brief at 3-7; Turkish Producers and Exporters' Posthearing Brief at 13-15.

²⁷⁸ Turkish Producers and Exporters' Prehearing Brief at 4-6.

²⁷⁹ *Common Alloy Aluminum Sheet From Indonesia: Final Determination of Sales at Less Than Fair Value, and Final Affirmative Finding of Critical Circumstances*, 86 Fed Reg. 13304, 13304 (Mar. 8, 2021); *Common Alloy Aluminum Sheet From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 86 Fed Reg. 13315, 13316 (Mar. 8, 2021).

²⁸⁰ In particular, the Commission has used five-month periods in recent investigations where the timing of the first preliminary Commerce determination authorizing the imposition of provisional duties would have served to reduce subject import volume in the sixth month of the post-petition period. See, e.g., *Cold-Rolled Steel Flat Products from China and Japan*, Inv. Nos. 701-TA-541 and 731-TA-1284 and 1286 (Final), USITC Pub. 4619 (July 2016); *Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531-532 and 731-TA-1270-1273 (Final), USITC Pub. 4604 at 31-32 (Apr. 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination caused reduction of subject import volume in sixth month).

²⁸¹ See CR/PR at I-2; *Common Alloy Aluminum Sheet From The Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical*

for Turkey came during the sixth month of the post-petition period, we have used five-month comparison periods: October 2019 – February 2020 for the pre-petition period and March – July 2020 for the post-petition period for the analysis concerning imports from Turkey.²⁸² Because there is only an antidumping duty investigation concerning imports from Indonesia with a preliminary determination by Commerce on October 15, 2020, we have used the six-month periods for analysis with respect to imports from Indonesia: September 2019 – February 2020 and March 2020 – August 2020.²⁸³ We do not agree that the post-petition period should end 90 days prior to the Commerce Department preliminary determinations as advocated by petitioners; as stated above, the purpose of the critical circumstances provision is “to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States *during the period between initiation of an investigation and a preliminary determination by {Commerce}.*”²⁸⁴

Indonesia. Imports of CAAS from Indonesia subject to Commerce’s affirmative critical circumstances finding in Commerce’s antidumping duty investigation were lower at *** short tons in the post-petition six month period (March – August 2020) than the *** short tons in the pre-petition comparison period (September 2019 – February 2020), a decrease of *** percent.²⁸⁵ U.S. importers also did not increase their inventories of CAAS from Indonesia after the filing of the petitions; rather, inventories declined slightly.²⁸⁶

Circumstances in Part, and Alignment of Final Determination With Final Antidumping Duty Determination, 85 Fed Reg. 49629 (Aug. 14, 2020).

²⁸² See CR/PR at Tables IV-6 and IV-7.

²⁸³ See CR/PR at Tables IV-4 and IV-5.

²⁸⁴ *ICC Industries, Inc. v. United States*, 812 F.2d 694, 700 (Fed. Cir. 1987) (emphasis added), quoting H.R. Rep. No. 317, 96th Cong., 1st Sess. 63 (1979), *aff’g*, 632 F. Supp. 36 (Ct. Int’l Trade 1986).

²⁸⁵ CR/PR at Table IV-4. We note that subject imports from Indonesia declined precipitously in the interim 2020 period (with a notable decline actually began in October 2019) to *** short tons, compared to *** short tons in the interim 2019 period. CR/PR at Table IV-2. We further note that the volume of imports from Indonesia during the interim 2020 period as a whole accounted for just *** of U.S. apparent domestic consumption during that period, while imports from Indonesia during the post-petition period constituted just *** percent of consumption during the interim 2020 period. CR/PR at Table C-1a.

²⁸⁶ See CR/PR at Table IV-5. We note that U.S. importers’ inventories of subject imports from Indonesia declined from *** short tons at the end of 2019 to *** short tons at the end of the post-petition comparison period (August 2020). CR at Tables IV-5 and VII-74. This indicates that U.S. importers were not stockpiling subject merchandise in advance of a preliminary determination; rather it indicates that importers were drawing down inventory even in advance of the petition filing, and for the most part, through the full post-petition comparison period.

In light of the decrease in imports and inventories of CAAS from Indonesia in the post-petition period and considering the record as a whole, we find that the subject imports from Indonesia subject to Commerce’s affirmative critical circumstances finding are not likely to undermine seriously the remedial effect of the antidumping duty order. Consequently, we determine that critical circumstances do not exist with respect to subject imports from Indonesia that are covered by Commerce’s affirmative critical circumstances finding in the antidumping duty investigation.

Turkey. Imports of CAAS from Turkey subject to Commerce’s affirmative critical circumstances finding in Commerce’s countervailing duty investigation were lower at *** short tons in the post-petition five-month period (March – July 2020) than *** short tons in the pre-petition five-month period (October 2019 – February 2020), a decrease of *** percent.²⁸⁷ U.S. importers also did not increase their inventories of CAAS from Turkey subject to Commerce’s affirmative critical circumstances determination after the filing of the petitions. Instead, inventories of merchandise subject to Commerce’s affirmative critical circumstances determination declined in each month of the post-petition comparison period.²⁸⁸

In light of the aforementioned decreases in imports and inventories of CAAS from Turkey in the post-petition period as well as the very low volume of imports in absolute terms, and taking the record as a whole, we find that subject imports from Turkey subject to Commerce’s affirmative critical circumstances finding are not likely to undermine seriously the remedial effect of the countervailing duty order. Consequently, we determine that critical circumstances do not exist with respect to subject imports from Turkey that are covered by Commerce’s affirmative critical circumstances finding in the countervailing duty investigation.²⁸⁹

²⁸⁷ CR/PR at Table IV-6. We further note that the volume of imports from Turkey during the interim 2020 period as a whole accounted for just *** of U.S. apparent domestic consumption during that period, while imports from Turkey during the post-petition period constituted just *** percent of consumption during the interim 2020 period. CR/PR at Table C-1a.

²⁸⁸ See CR/PR at Table IV-7.

²⁸⁹ Chair Kearns and Commissioner Karpel observe that the statute directs the Commission to consider the following factors in making this determination: “the timing and volume of the imports, a rapid increase in the inventories of the imports, and any other circumstances indicating that the remedial effect of the antidumping order will be seriously undermined.” 19 U.S.C. § 1673d(b)(4)(A)(ii). In their analysis, they would therefore take into account a number of factors as appropriate to a given investigation (as directed by the statute) and do not necessarily give precedence to the pre- and post-petition subject import volumes. Among the factors they may consider, depending on the facts of the investigation and the parties’ arguments, are subject import volumes relative to consumption or production, monthly changes in subject import volume, subject import inventories (both absolute and

VIII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey found by Commerce to be sold in the United States at LTFV and subsidized by the governments of Bahrain, India, and Turkey. We also find that critical circumstances do not exist with respect to imports of CAAS from Indonesia and Turkey subject to Commerce's affirmative critical circumstances determinations.

relative to imports or shipments of imports), purchaser inventories, pricing, and the domestic industry's performance. Their negative findings in these investigations are based on record evidence regarding factors including pre-and post-petition subject import volumes measured in absolute quantities and relative to apparent U.S. consumption, as well as monthly changes in subject import volumes and subject import inventories.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by The Aluminum Association Common Alloy Aluminum Sheet Working Group and its Individual Members, Aleris Rolled Products, Inc. (“Aleris”), Beachwood, Ohio; Arconic, Inc. (“Arconic”), Bettendorf, Iowa; Constellium Rolled Products Ravenswood, LLC (“Constellium”), Ravenswood, West Virginia; JW Aluminum Company (“JW Aluminum”), Daniel Island, South Carolina; Novelis Corporation (“Novelis”), Atlanta, Georgia; and Texarkana Aluminum, Inc. (“Texarkana”), Texarkana, Texas, on March 9, 2020, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value (“LTFV”) imports of common alloy aluminum sheet (“CAAS”)¹ from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey, and imports of CAAS subsidized by the Governments of Bahrain, Brazil, India, and Turkey. The following tabulation provides information relating to the background of these investigations.^{2 3}

¹ See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

² Pertinent *Federal Register* notices are referenced in appendix A and may be found at the Commission’s website (www.usitc.gov).

³ Appendix B presents the witnesses participating in the Commission’s hearing.

Effective date	Action
March 9, 2020	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (85 FR 14702, March 13, 2020)
March 30, 2020	Commerce's notice of initiation AD (85 FR 19444, April 7, 2020)
March 30, 2020	Commerce's notice of initiation CVD (85 FR 19449, April 7, 2020)
April 23, 2020	Commission's preliminary determinations (85 FR 23842, April 29, 2020)
August 14, 2020	Commerce's preliminary countervailing duty determinations (85 FR 49636, 85 FR 49634, 85 FR 49631, 85 FR 49629)
October 15, 2020	Commerce's preliminary antidumping duty determinations (85 FR 65372, 85 FR 65363, 85 FR 65384, 85 FR 65382, 85 FR 65386, 85 FR 65374, 85 FR 65377, 85 FR 65356, 85 FR 65342, 85 FR 65354, 85 FR 65340, 85 FR 65358, 85 FR 65370, 85 FR 65349, 85 FR 65351, 85 FR 65367, 85 FR 65361, 85 FR 65346, October 15, 2020); scheduling of final phase of Commission investigations (85 FR 73511, November 18, 2020)
March 2, 2021	Commission's hearing
March 8, 2021	Commerce's negative final countervailing duty determinations with regards to Brazil (86 FR 13289), and negative final antidumping determinations with regards to Greece and Korea (86 FR 13300, 86 FR 13307)
March 8, 2021	Commerce's affirmative final antidumping duty determinations (86 FR 13331, 86 FR 13302, 86 FR 13312, 86 FR 13324, 86 FR 13318, 86 FR 13282, 86 FR 13304, 86 FR 13309, 86 FR 13328, 86 FR 13320, 86 FR 13295, 86 FR 13305, 86 FR 13287, 86 FR 13298, 86 FR 13293, 86 FR 13326), affirmative final countervailing duty determinations (86 FR 13333, 86 FR 13285, 86 FR 13315)
March 8, 2021	Commission's termination of CVD investigation on CAAS from Brazil, AD investigation of CAAS from Greece, and AD investigation of CAAS from Korea (86 FR 14338, March 15, 2021)
March 31, 2021	Commission's vote
April 20, 2021	Commission's views

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the “Act”) (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--⁴

In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

⁴ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—⁵

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part I of this report presents information on the subject merchandise, subsidy/dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

The building and construction, infrastructure, electrical, marine, and transportation sectors utilize CAAS in a variety of applications including heat exchangers, air conditioning evaporators, motor vehicle radiators, home appliances, mobile homes, residential siding, architecture, and general sheet metal work. The leading U.S. producers of CAAS are Aleris and Arconic, while leading producers of CAAS from subject sources that submitted questionnaire responses include Hydro Aluminium Rolled Products GmbH (“Hydro Aluminium”) and Novelis Deutschland GmbH (“Novelis Deutschland”) of Germany, Assan Alüminyum Sanayi ve Ticaret A.Ş. (“Assan”) of Turkey, Profilglass SPA (“Profilglass”) of Italy, Aludium Transformacion de Productos S.L. (“Aludium”) of Spain, and Hindalco Industries Limited (“Hindalco”) of India. The leading U.S. importers of CAAS from subject sources are ***. Leading importers of CAAS from nonsubject sources include ***. U.S. purchasers of

⁵ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

CAAS are firms that are end users in construction and auto production, distributors, and converters; large purchasers of CAAS include distributors *** and end users ***.

Apparent U.S. consumption of CAAS totaled approximately *** short tons (\$***) in 2019. Currently, 11 confirmed firms are known to produce CAAS in the United States. U.S. producers' U.S. shipments of CAAS totaled *** short tons (\$***) in 2019 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** short tons *** in 2019 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** short tons *** in 2019 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C. Except as noted, U.S. industry data are based on questionnaire responses of 11 firms that accounted for the vast majority of U.S. production of CAAS during 2019. U.S. imports are based on official U.S. import statistics under 14 HTS statistical reporting numbers⁶ and data submitted in

⁶ From January 1, 2017 through June 30, 2019, imports of CAAS entered the United States under HTSUS 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 1, 2019, the following changes to the HTSUS were made: (1) statistical reporting number 7606.91.3090 was consolidated with statistical reporting number 7606.91.3075 into current HTSUS statistical reporting number 7606.91.3095; (2) statistical reporting number 7606.91.6080 was consolidated with statistical reporting number 7606.91.6060 into current HTSUS statistical reporting number 7606.91.6095; (3) statistical reporting number 7606.92.3090 was consolidated with statistical reporting number 7606.92.3075 into current HTSUS statistical reporting number 7606.92.3035; and (4) statistical reporting number 7606.92.6080 was consolidated with statistical reporting number 7606.92.6060 into current HTSUS statistical reporting number 7606.92.6095. Given these various changes, the quantity and value of imports for calendar year 2019 include imports under the following HTSUS statistical reporting numbers: 7606.11.3060, 7606.11.6000, 7606.12.3090, 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. Effective January 1, 2020, statistical reporting number 7606.12.3090, which covered not clad aluminum alloy sheet and strip with a thickness exceeding 0.2 millimeters and 6.3 millimeters or less (not including aluminum can stock), was sub-divided into two new categories, HTSUS statistical reporting numbers 7606.12.3091 and 7606.12.3096. These statistical reporting numbers cover imports of out-of-scope heat-treatable sheet, and in-scope CAAS, respectively. As a result, CAAS imports under HTSUS statistical reporting number 7606.12.3090 for calendar years 2017-19 are somewhat overstated and contain some volume of out-of-scope heat-treatable sheet.

response to Commission questionnaires. Additional data regarding imported CAAS are based on the responses of 88 U.S. importers which accounted for 73.4 percent of imports from all import sources. Additionally, the Commission received 52 usable questionnaire responses from firms that have purchased CAAS since 2017. The Commission received 36 foreign producer questionnaires from firms in 15 subject countries.⁷ Reported coverage of CAAS exports to the United States in 2019 ranged from approximately 40 percent to 80 percent for six countries (***) and more than 80 percent of exports for 9 countries (***)⁸.

Previous and related investigations

CAAS has been the subject of prior countervailing and antidumping duty investigations in the United States. In December 2017, the Commission instituted investigations on CAAS from China in response to a notification of investigations self-initiated by Commerce. The Commission determined that an industry in the United States was materially injured by reason of imports of CAAS from China that have been found by Commerce to be sold in the United States at LTFV, and to be subsidized by the government of China.⁹ In February 2019, Commerce issued antidumping and countervailing duty orders on CAAS from China.¹⁰

In 2018, the Commission conducted final phase antidumping duty and countervailing duty investigations on aluminum foil from China. The Commission determined that an industry in the United States was materially injured by reason of imports of aluminum foil from China that Commerce determined to be subsidized and sold in the United States at less than fair value.¹¹ In April 2018, Commerce issued antidumping and countervailing duty orders on aluminum foil from China.¹² In addition, Commerce and the Commission are conducting investigations regarding aluminum foil from Armenia, Brazil, Oman, Russia, and Turkey. On November 13, 2020, the Commission preliminarily determined that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of

⁷ The Commission did not receive a foreign producer/exporter questionnaire response from any firms in Indonesia.

⁸ Coverage figures were calculated comparing reported figures from foreign producer questionnaires and official import statistics.

⁹ USITC Publication 4861, January 2019, p.1.

¹⁰ 83 FR 17651, April 23, 2018; 83 FR 57427, November 15, 2018; 84 FR 2157, February 6, 2019; 83 FR 29088, June 22, 2018; 83 FR 57421, November 15, 2018; 84 FR 2813, February 8, 2019.

¹¹ USITC Publication 4771, May 2018, p. 1

¹² 83 FR 17360, April 19, 2018 and 83 FR 17362, April 19, 2018.

aluminum foil from Armenia, Brazil, Oman, Russia, and Turkey, that are alleged to be sold in the United States at LTFV and imports of aluminum foil that are allegedly subsidized by the governments of Oman and Turkey.¹³ These investigations are ongoing at the time of this report.

In 2017, the Commission conducted a study of the global aluminum industry and of factors affecting the global competitiveness of the U.S. aluminum industry, which included both unwrought (primary and secondary) and wrought (semi-finished) aluminum products.¹⁴

In 2004, the Commission conducted an antidumping duty investigation on aluminum plate from South Africa. The Commission determined that an industry in the United States was not materially injured or threatened with material injury, and the establishment of an industry in the United States was not materially retarded, by reason of imports from South Africa of certain aluminum plate.¹⁵

¹³ 85 FR 73748, November 19, 2020.

¹⁴ USITC Publication 4703, June 2017, p. 30

¹⁵ USITC Publication 3734, November 2004, p. 1.

Nature and extent of subsidies and sales at LTFV

Subsidies

On March 8, 2021, Commerce published notices in the *Federal Register* of its affirmative final determinations of countervailable subsidies for producers and exporters of CAAS from Bahrain,¹⁶ India,¹⁷ and Turkey.¹⁸ Commerce also issued a negative final countervailing duty determination with regard to producers and exporters of CAAS from Brazil.¹⁹ Tables I-1 through I-4 present Commerce's findings of subsidization of CAAS in Bahrain, Brazil, India, and Turkey.

¹⁶ 86 FR 13333, March 8, 2021. Commerce determined the following programs to be countervailable with respect to Bahrain: Provision of Land for Less Than Adequate Remuneration (LTAR); Provision of Natural Gas for LTAR; Provision of Electricity for LTAR; Import Duty Exemptions for Industrial Inputs; and Tamkeen Programs. See Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Common Alloy Aluminum Sheet from Bahrain, p. 4.

¹⁷ 86 FR 13285, March 8, 2021. Commerce determined the following programs to be countervailable with respect to India: Advance Authorization Program (AAP); Duty Drawback (DDB) Program; Export Promotion of Capital Goods Scheme (EPCGS); Merchandise Export from India Scheme (MEIS); EOU Scheme – Reimbursement of Central Sales Tax (CST) Paid on Goods Manufactured in India; Provision of Coal for LTAR; State Government of Maharashtra (SGOM) Subsidy Programs (Electricity Duty Exemption); State Government of Gujarat (SGOG) Subsidy Programs (SGOG Water for LTAR, SGOG Land for LTAR, and Electricity Duty Exemption); State Government of Uttar Pradesh (SGUP) Subsidy Program (Electricity Duty Exemption); and State Government of Madhya Pradesh (SGMP) Subsidy Program (Electricity Duty Exemption). See Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Common Alloy Aluminum Sheet from India, pp. 10-12.

¹⁸ 86 FR 13315, March 8, 2021. Commerce determined the following programs to be countervailable with respect to Turkey: Tax Program: Exemption from Property Tax; Investment Incentive Scheme Program: Regional Investment Incentive Scheme (RIIS); Export Financing (Rediscount Loan Program; Export Financing: Export-Oriented Working Capital Credit (also known as Export-Oriented Business Investment Loans); Research and Development (R&D) Incentives Under Turkey's R&D Law; Exemption on Exchange Tax for Foreign Exchange Transactions; Turquality Program; Provision of Land Provided Under Law No. 4916; Special Consumption Tax Refund ; and Other Subsidy Programs. See Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Common Alloy Aluminum Sheet from the Republic of Turkey, pp. 12-14.

¹⁹ 86 FR 13289, March 8, 2021.

Table I-1**CAAS: Commerce's subsidy determination with respect to imports from Bahrain**

Entity	Preliminary countervailable subsidy rate (percent)	Final countervailable subsidy rate (percent)
Gulf Aluminium Rolling Mill B.S.C	9.49	6.44
All others	9.49	6.44

Source: 85 FR 49636, August 14, 2020 and 86 FR 13333, March 8, 2021.

Table I-2**CAAS: Commerce's subsidy determination with respect to imports from Brazil**

Entity	Preliminary countervailable subsidy rate <i>ad valorem</i> (percent)	Final countervailable subsidy rate <i>ad valorem</i> (percent)
Companhia Brasileira de Alumínio (CBA)	1.32	0.22 (<i>de minimis</i>)
Novelis do Brasil Ltda. (Novelis)	0.76 (<i>de minimis</i>)	0.75 (<i>de minimis</i>)

Source: 85 FR 49634, August 14, 2020 and 86 FR 13289, March 8, 2021.

Table I-3**CAAS: Commerce's subsidy determination with respect to imports from India**

Entity	Preliminary countervailable subsidy rate <i>ad valorem</i> (percent)	Final countervailable subsidy rate <i>ad valorem</i> (percent)
Hindalco Industries Limited	34.84	35.25
Manaksia Aluminium Company Limited	4.55	4.89
All others	29.76	30.15

Source: 85 FR 49631, August 14, 2020 and 86 FR 13285, March 8, 2021.

Table I-4**CAAS: Commerce's subsidy determination with respect to imports from Turkey**

Entity	Preliminary countervailable subsidy rate <i>ad valorem</i> (percent)	Final countervailable subsidy rate <i>ad valorem</i> (percent)
Assan Aluminyum Sanayi ve Ticaret A.S.	3.15	2.56
Teknik Aluminyum Sanayi A.S.	0.07 (<i>de minimis</i>)	4.34
All others	3.15	3.45

Source: 85 FR 49629, August 14, 2020 and 86 FR 13315, March 8, 2021.

Sales at LTFV

On March 8, 2021, Commerce published notices in the *Federal Register* of its final affirmative determinations of sales at LTFV with respect to imports from Bahrain, Brazil, Croatia, Egypt, Germany, India, Indonesia, Italy, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey.²⁰ Commerce also published notices of its final negative determinations of sales at LTFV with respect to imports from Greece and Korea.²¹ Tables I-5 through I-22 present Commerce’s dumping margins with respect to imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey.

Table I-5

CAAS: Commerce’s weighted-average LTFV margins with respect to imports from Bahrain

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Gulf Aluminium Rolling Mill B.S.C	4.21	4.83
All others	4.21	4.83

Source: 85 FR 65372, October 15, 2020 and 86 FR 13331, March 8, 2021.

Table I-6

CAAS: Commerce’s weighted-average LTFV margins with respect to imports from Brazil

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Companhia Brasileira de Alumínio	136.78 (<i>Adverse Facts Available</i>)	137.06
Novelis do Brasil Ltda	49.48	49.61
All others	49.48	49.61

Source: 85 FR 65363, October 15, 2020 and 86 FR 13302, March 8, 2021.

²⁰ 86 FR 13331, 86 FR 13302, 86 FR 13312, 86 FR 13324, 86 FR 13318, 86 FR 13282, 86 FR 13304, 86 FR 13309, 86 FR 13328, 86 FR 13320, 86 FR 13295, 86 FR 13305, 86 FR 13287, 86 FR 13298, 86 FR 13293, 86 FR 13326, March 8, 2021.

²¹ 86 FR 13300, 86 FR 13307, March 8, 2021.

Table I-7**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Croatia**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Impol d.o.o./Impol-TLM d.o.o.	3.22	3.19
All others	3.22	3.19

Source: 85 FR 65384, October 15, 2020 and 86 FR 13312, March 8, 2021.

Table I-8**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Egypt**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Aluminium Co. of Egypt (Egyptalum)/Egyptian Copper Works Company	10.42	12.11
All others	10.42	12.11

Source: 85 FR 65382, October 15, 2020 and 86 FR 13324, March 8, 2021.

Table I-9**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Germany**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Hydro Aluminium Rolled Products GmbH	352.71	242.80
Novelis Deutschland GmbH	51.18	49.40
All others	51.18	49.40

Source: 85 FR 65386, October 15, 2020 and 86 FR 13318, March 8, 2021.

Table I-10**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Greece**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Elval Hellenic Aluminum Industry S.A. /Elval Colour S.A./Symetal S.A	2.72	0.00

Source: 85 FR 65374, October 15, 2020 and 86 FR 13300, March 8, 2021.

Table I-11**CAAS: Commerce's weighted-average LTFV margins with respect to imports from India**

Entity	Preliminary dumping margin (percent)	Cash deposit rate (adjusted for subsidy offset(s)) (percent)	Final dumping margin (percent)
Hindalco Industries Limited	47.92	44.64	47.92
Manaksia Aluminium Company Limited	0.00	0.00	0.00
All others	47.92	44.64	47.92

Source: 85 FR 65377, October 15, 2020 and 86 FR 13282, March 8, 2021.

Table I-12**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Indonesia**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Pt. Alumindo Light Metal Industry Tbk	32.12	32.12
All others	32.12	32.12

Source: 85 FR 65356, October 15, 2020 and 86 FR 13304, March 8, 2021.

Table I-13**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Italy**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Laminazione Sottile S.p.A	0.00	0.00
Profilglass S.p.A	29.13	29.13
All others	14.57	14.57

Source: 85 FR 65342, October 15, 2020 and 86 FR 13309, March 8, 2021.

Table I-14**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Korea**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Novelis Korea Limited/Ulsan Aluminum Limited	5.04	0.00

Source: 85 FR 65354, October 15, 2020 and 86 FR 13307, March 8, 2021.

Table I-15**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Oman**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Oman Aluminium Rolling Company (OARC)	3.53	5.29
All others	3.53	5.29

Source: 85 FR 65340, October 15, 2020 and 86 FR 13328, March 8, 2021.

Table I-16**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Romania**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Alro, SA	83.94	37.26
All others	12.51	12.51

Source: 85 FR 65358, October 15, 2020 and 86 FR 13320, March 8, 2021.

Table I-17**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Serbia**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Impol Seval, a.d./Impol d.o.o.	11.24	11.67
Otovici Doo	25.84	25.84
All others	11.24	11.67

Source: 85 FR 65370, October 15, 2020 and 86 FR 13295, March 8, 2021.

Table I-18**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Slovenia**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Impol d.o.o./Impol FT, d.o.o.	4.80	13.43
All others	4.80	13.43

Source: 85 FR 65349, October 15, 2020 and 86 FR 13305, March 8, 2021.

Table I-19**CAAS: Commerce's weighted-average LTFV margins with respect to imports from South Africa**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Hulamin Operations (Pty) Ltd	8.98	8.85
All others	8.98	8.85

Source: 85 FR 65351, October 15, 2020 and 86 FR 13287, March 8, 2021.

Table I-20**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Spain**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Aludium Transformacion de Productos, S.L	3.75	3.80
Compania Valenciana de Aluminio Baux S.L.U./Bancolor Baux S.L.U	23.32	24.23
All others	3.75	3.80

Source: 85 FR 65367, October 15, 2020 and 86 FR 13298, March 8, 2021.

Table I-21**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Taiwan**

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
CSAC	18.02	17.50
All others	18.02	17.50

Source: 85 FR 65361, October 15, 2020 and 86 FR 13293, March 8, 2021.

Table I-22**CAAS: Commerce's weighted-average LTFV margins with respect to imports from Turkey**

Entity	Preliminary dumping margin (percent)	Cash deposit rate (adjusted for subsidy offset(s)) (percent)	Final dumping margin (percent)
Assan Aluminyum Sanayi ve Ticaret A.S. (Assan)	12.65	12.11	2.02
Teknik Aluminyum Sanayi A.S. (Teknik)	12.90	12.90	13.56
All others	12.71	12.30	4.85

Source: 85 FR 65346, October 15, 2020 and 86 FR 13326, March 8, 2021.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:²²

The products covered by these investigations are common alloy aluminum 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 these investigations 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. The use of a proprietary alloy or non-proprietary alloy that is not specifically registered by the Aluminum Association as a discrete 1XXX-, 3XXX-, or 5XXX-series alloy, but that otherwise has a chemistry that is consistent with these designations, does not remove an otherwise in-scope product from the scope.

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 these investigations if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of these investigations 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 H19, H-41, H-48, H-39, 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

²² Commerce Final Scope Decision Memorandum, March 1, 2021.

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.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is imported under the following provisions of the Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”): 7606.11.3060, 7606.11.6000, 7606.12.3096, 7606.12.6000, 7606.91.3095, 7606.91.6095, 7606.92.3035, or 7606.92.6095. CAAS provided for in the covered HTS subheadings is accorded a Column 1-General duty rate of 3.0 percent (HTS 7606.11.30, 7606.12.30, 7606.91.30, 7606.92.30), 2.7 percent (HTS 7606.11.60, 7606.91.60), or 6.5 percent ad valorem (HTS 7606.12.60, 7606.92.60).²³ CAAS originating in Bahrain, Oman, or Korea is eligible for Column 1-Special duty rates of “Free” under the respective United States-Bahrain Free Trade Agreement Implementation Act, the United States-Oman Free Trade Agreement Implementation Act, and the United States-Korea Free Trade Agreement Implementation Act,²⁴ for all HTS subheadings subject to these investigations.

The merchandise subject to these investigations may also be imported under HTS statistical reporting numbers 7606.11.3030, 7606.12.3015, 7606.12.3025, 7606.12.3035, 7606.12.3091, 7606.91.3055, 7606.91.6055, 7606.92.3025, 7606.92.6055, or 7607.11.9090. The general rate of duty for subheading 7607.11.90 is 3 percent ad valorem; other general rates are indicated above for covered tariff rate lines.²⁵ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

²³ *HTSUS (2021) Preliminary Revision 3*, USITC Publication 5161, January 2021, pp. 76-7 – 76-9, 76-18.

²⁴ *HTSUS (2021) Preliminary Revision 3*, USITC Publication 5161, January 2021, HTS General Note 3(c), pp. GN-6 – GN-7.

²⁵ *HTSUS (2021) Preliminary Revision 3*, USITC Publication 5161, January 2021, pp. 76-7 – 76-10, 76-18.

Section 232 tariff treatment

CAAS originating in the 16 subject U.S. trade partners are subject to additional 10 percent ad valorem duties under Section 232 of the *Trade Expansion Act of 1962*, as amended.²⁶ Effective September 11, 2018, the Secretary of Commerce is authorized to grant exclusion from the duties if the Secretary determines the aluminum article for which the exclusion is requested is not “produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality” or should be excluded “based upon specific national security considerations.” Parties wishing to file an Exclusion Request must indicate in their application why their organization requires an Exclusion by selecting one of the following options from a dropdown box: 1. “Insufficient U.S. Availability”, 2. “No U.S. Production”, 3. “National Security Requirement” or 4. “Other”. If selecting “Other”, the organization must provide additional comments.²⁷

Parties wishing to submit an exclusion request also must certify that the following statements are true:

- A. The organization intends to manufacture, process, or otherwise transform the imported product for which it has filed an exclusion request or it has a purchase order or orders for such products;
- B. The organization does not intend to use the exclusion for which it has filed an exclusion request, if granted, solely to hedge or arbitrage the price;
- C. The organization expects to consume, sell, or otherwise use the total volume of product across all its active exclusions and pending exclusion requests in the course of the organization’s business activities within the next calendar year;
- D. If the organization is submitting an exclusion request for a product for which it previously received an exclusion, the organization must certify that it either imported the full amount of its approved exclusion(s) last year or intended to import the full amount but could not due to one of the following reasons:
 1. loss of contract(s);
 2. unanticipated business downturns; or
 3. other factors that were beyond the organizations’ control that directly resulted in less need for steel or aluminum articles; and

²⁶ 19 U.S.C. 1862.

²⁷ 83 FR 46026, September 11, 2018.

- E. The organization must certify that the exclusion amount requested this year is in line with what the organization expects to import based on its current business outlook. If requested by the Department of Commerce, the organization shall provide documentation that justifies its assertions in this certification regarding its past imports of steel or aluminum articles and its projections for the current year, as it relates to past and current calendar year exclusion requests.²⁸

For further information on the Section 232 measures, see appendix D table D-1. See also U.S. notes 19(a) and 19(b) in subchapter III of HTS chapter 99.²⁹

Section 301 tariff treatment

Nonsubject CAAS originating in China is currently subject to additional 7.5 percent ad valorem duties, as of February 14, 2020, under Section 301 of the *Trade Act of 1974*, as amended.³⁰ Duties on nonsubject CAAS originating in China were originally subject to 10 percent ad valorem duties, as of September 1, 2019. These additional 10 percent ad valorem duties were subsequently increased to 15 percent on products covered by Annex A, while retaining the original effective date of September 1, 2019.³¹ As of February 14, 2020 these ad valorem duties were reduced to 7.5 percent.³² See also U.S. notes 20(r) and 20(s) in subchapter III of HTS chapter 99.³³

²⁸ U.S. Department of Commerce, “New Exclusion Request,” <https://232app.azurewebsites.net/Forms/NewExclusionRequest>, retrieved March 5, 2020.

²⁹ *HTSUS (2021) Revision 2*, USITC Publication 5156, January 2021, p. 99-III-13 – 99-III-14, 99-III-238.

³⁰ 19 U.S.C. § 2411. CAAS originating in China is among the products enumerated by the Office of the United States Trade Representative (USTR) in its \$300 billion trade action (List 4 in Annexes A and B to 84 FR 43304, August 20, 2019), subject to additional 10 percent ad valorem duties, as of September 1, 2019.; USTR, “China Section 301-Tariff Actions and Exclusion Process, \$300 Billion Trade Action (List 4),” <https://ustr.gov/issue-areas/enforcement/section-301-investigations/section-301-china/300-billion-trade-action>, retrieved March 3, 2021.

³¹ 84 FR 45821, August 30, 2019.

³² 85 FR 3741, January 22, 2020.

³³ *HTSUS (2021) Revision 2*, USITC Publication 5156, January 2021, pp. 99-III- 82 – 99-III- 84, 99-III-94, 99-III-242.

The product

Description and applications

Common alloy aluminum sheet (“CAAS”) is a thin wrought aluminum product that is produced via a rolling process.³⁴ Like other aluminum sheet products, the subject product has a thickness of 6.3 mm or less, but greater than 0.2 mm. The subject product in these investigations includes both CAAS in rolled coils or cut-to-length, regardless of width. Commerce’s scope in these investigations also includes both not clad and multi-alloy clad aluminum sheet. Non-clad aluminum alloy sheet is derived from molten aluminum that is mixed with other nonferrous metals, and then cast into a semi-finished form for further processing (i.e., rolling). Multi-alloy clad aluminum sheet is produced through a roll bonding process, during which aluminum sheet and other nonferrous metals or aluminum alloy sheets are passed concurrently through steel rollers that apply pressure to bind the metals together (see figure I-3). 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. Like non-clad 3XXX series aluminum sheet, multi-alloy 3XXX series clad aluminum sheet is often used in heat exchangers.³⁵

Table I-23 presents information on subject alloy series, properties of those alloys, and the end use applications. The pricing products in these investigations are composed of Alloy 3003, Alloy 3105, and Alloy 5052, whose properties and end uses are described later in this section. These products also have unique temper designations, which are alphanumeric codes that convey to the producer and end user information about the manner in which the aluminum has been mechanically and/or thermally treated to obtain the desired properties.³⁶

³⁴ Wrought aluminum consists of aluminum products that are rolled, drawn, extruded, or otherwise mechanically formed of aluminum or aluminum alloys.

³⁵ Euh et. al, “Microstructure and Property Variation of Roll-Bonded 4XXX/3003/4XXX Aluminum Clad Sheets with Thermomechanical Process,” The Japan Institute of Light Metals, September 2010, pp. 1668 – 1672.

³⁶ Kaufman, “Understanding the Aluminum Temper Designation System,” 2013, <https://materialsdata.nist.gov/bitstream/handle/11115/186/Understanding%20Temper%20Designation.pdf?isAllowed=y&sequence=3>, retrieved March 5, 2021.

Table I-23
Aluminum alloys: Alloy series, alloying metal, properties, and end uses

Series	Alloying metal	Properties	End use applications
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, lithographic sheet
3XXX	Manganese (Mn)	Non-heat-treatable, medium strength, good formability, good corrosion resistance	Interior automotive, storage tanks, beverage cans, home and kitchen 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.— 1XXX, 3XXX, and 5XXX series alloys are included in Commerce’s scope. However, the properties and end uses described above may include product that is out of scope (e.g., due to thickness) or specifically excluded from the scope (e.g., can stock). 6XXX series alloys are not included within Commerce’s scope.

Source: Aluminum Association, “Aluminum Alloys 101,” <https://www.aluminum.org/resources/industry-standards/aluminum-alloys-101> (accessed December 23, 2020).; ASM International, “Subject Guide: Aluminum and Aluminum Alloys,” <https://www.asminternational.org/aluminum/subject-guide> (accessed December 23, 2020).; Havrilla, “Joining Aluminum with Laser,” <https://www.thefabricator.com/thewelder/article/laserwelding/joining-aluminum-with-laser>, July 12, 2013; Aluminum: Competitive Conditions Affecting the U.S. Industry, Inv. No. 332-557, USITC Publication 4703, June 2017, pp. 530-31; Clinton Aluminum, “Aluminum Uses in Lithographic Plates,” <https://www.clintonaluminum.com/aluminum-uses-in-lithographic-plates/>, March 5, 2019.

CAAS is used in a variety of applications, and different alloys are used to elicit certain characteristics. Common applications for Alloy 3003 sheet include heat exchangers, air condition evaporators, motor vehicle radiators, piping, and oil tanks, and home appliances. Alloy 3105 sheet is commonly used in manufacturing mobile homes, residential siding, and rain carrying goods (e.g., gutters and downspouts).³⁷ Common applications for Alloy 5052 sheet

³⁷ AZO Materials, “Aluminium / Aluminum 3105 Alloy (UNS A93015),” <https://www.azom.com/article.aspx?ArticleID=6620>, retrieved March 5, 2021.; AUCJ Automobile Technology, “Types and Applications of Aluminum Alloys for Vehicles,” https://uacj-automobile.com/types_and_applications.html, retrieved March 5, 2021.; JW Aluminum, “3003 Aluminum Coil,” <http://www.jw-aluminum.com/products/aluminum-coil/3003-doil.html>, retrieved March 5, 2021.

include architecture, general sheet metal work, heat exchangers, and vehicle applications such as meter display panels, AT drums, air bag inflators, fuel tanks, and covers.³⁸ Petitioners note that CAAS products subject to these investigations are commonly used in downstream industries such as transportation (e.g., truck trailers, passenger cars and light trucks, and trucks and buses); building and construction (e.g., siding, gutters, downspouts, curtail wall, and roofing); infrastructure (e.g., signs and license plate stock); and electrical and marine applications.³⁹

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.

The scope of these investigations 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 manufactured with a thickness ranging from 0.200 mm to 0.292 mm, thereby overlapping with the thickness requirements of both aluminum foil and aluminum sheet—as well as with any of the following tempers: H-19, H-41, H-48, or H-39.⁴⁰ Aluminum can body stock is manufactured using Alloy 3004 which provides sufficient strength for the body of the can at the thinnest possible gauge. Aluminum can lid and tab stock use a stronger alloy (Alloy 5182) in order to maintain pressure within the can.⁴¹ Aluminum can stock also has a lubricant applied to its surface in order to easily facilitate movement throughout the final can assembly equipment.

³⁸ AUCJ Automobile Technology, “Types and Applications of Aluminum Alloys for Vehicles,” https://uacj-automobile.com/types_and_applications.html, retrieved March 5, 2021.; JW Aluminum, “5052 Aluminum Coil,” <http://www.jw-aluminum.com/products/aluminum-coil/5052-coil.html>, retrieved March 5, 2021.

³⁹ Petition, p. 7.; 6XXX series alloys (not included in Commerce’s scope) are used primarily in automotive applications (e.g., automotive body sheet), as well as other applications such as railcars and marine vessel frames.

⁴⁰ 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.

⁴¹ Schaeffler, Sheet Aluminum Alloys for Cans and Cars,” *The Fabricator*, <https://www.thefabricator.com/thefabricator/article/metalsmaterials/sheet-aluminum-alloys-for-cans-and-cars>, retrieved March 19, 2020.

Manufacturing processes

The manufacturing processes for CAAS are summarized below. In general, there are three distinct stages that include: (1) melting and refining aluminum, (2) casting aluminum into semi-finished forms such as sheet ingot, and (3) rolling semi-finished forms into flat-rolled products such as aluminum sheet.⁴² Figure I-1 includes images of an aluminum rolling mill (left) and coils of aluminum sheet (right).

Figure I-1: Novelis, Oswego, New York aluminum rolling mill (left), stacked coils of aluminum sheet (right)



Source: The International Aluminum Institute, "Rolling," <http://primary.world-aluminium.org/processes/rolling/>, retrieved December 7, 2020.

Melting and refining

Aluminum is produced using either the primary or secondary smelting process. 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. The alumina is then electrolytically smelted to remove oxygen and produce molten aluminum metal (i.e., the Hall-Héroult process). This process is energy-intensive and 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).

⁴² 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. *Aluminum: Competitive Conditions Affecting the U.S. Industry*, Inv. No. 332-557, USITC Publication 4703, June 2017, p. 27.

Unlike the primary smelting process, aluminum produced using the secondary smelting process is sourced from old and new sources of aluminum scrap metal.⁴³ Secondary smelters 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 smelters rely on a combination of primary and scrap aluminum (including old sheet), and may adjust the amount of primary aluminum they mix in depending on the availability and price of scrap metal relative to primary aluminum.⁴⁴ 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 higher production costs, but produces a higher-quality product when compared to continuous casting.

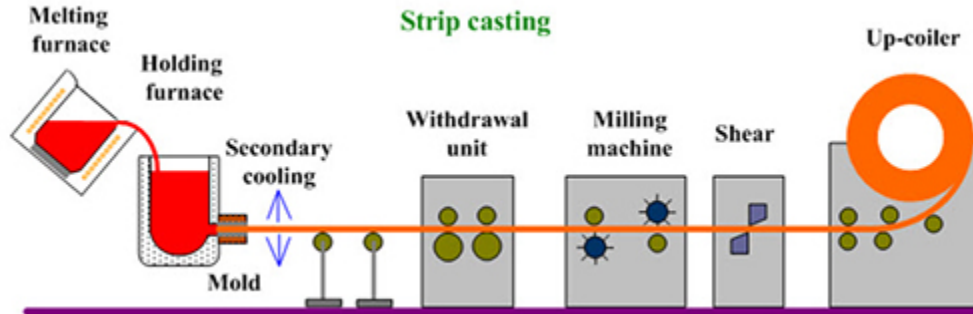
Continuous casting

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 and emerges as a continuous solid strip of aluminum (figure I-2). 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. 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.

⁴³ Old scrap is post-consumer material derived from various end uses such as manufactured products and construction materials. New scrap is generated during the manufacturing of various aluminum products, and often takes the form of shavings and trimmings.

⁴⁴ *Aluminum: Competitive Conditions Affecting the U.S. Industry, Inv. No. 332-557*, USITC Publication 4703, June 2017, pp. 138, 166-167.

Figure I-2
Aluminum sheet: Strip casting (continuous casting process)



Source: Total Materia, "Aluminum Strip Casting," <https://www.totalmateria.com/page.aspx?ID=CheckArticle&site=ktn&NM=403>, retrieved December 8, 2020.

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 desired 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 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. These semi-finished products are then removed from the casting unit and undergo a process known as scalping before they are cooled to room temperature and transferred to a hot rolling mill for further processing.⁴⁵

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 difference between these methods is how the input (in coils, slabs, sheet ingot) is treated before it is reduced. Cast aluminum intended for the production of aluminum sheet must pass through a hot-rolling mill, where its dimensions are reduced to the thickness of plate. The product must then be fed through additional hot or cold rolling mills in order to be reduced to the thickness of sheet.⁴⁶ Hot mills require more energy and roll sheet at a slower

⁴⁵ Scalping removes irregularities or undesirable chemical compositions from the surface of the ingot.

⁴⁶ Aluminum Association, "Rolling Aluminum: From the Mine to the Mill," December 2007, p. 5-1. https://www.aluminum.org/sites/default/files/Rolling_Aluminum_From_The_Mine_Through_The_Mill.pdf, accessed March 11, 2021.

rate than cold mills.⁴⁷ Respondents argue that “the hot mill production process is the most expensive and complex by far” and that the domestic industry has not invested in any significant new hot-rolling capacity since the 1980’s.⁴⁸ According to the petitioners’ posthearing brief, both JW Aluminum and Texarkana added new hot mills in 2020 with a combined capacity of more than *** short tons. Other domestic producers have also indicated that they either upgraded their hot mills since 2017 or are projecting that their hot mill capacity will continue to increase in the coming years.⁴⁹

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, during 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 (see figure I-3).⁵⁰

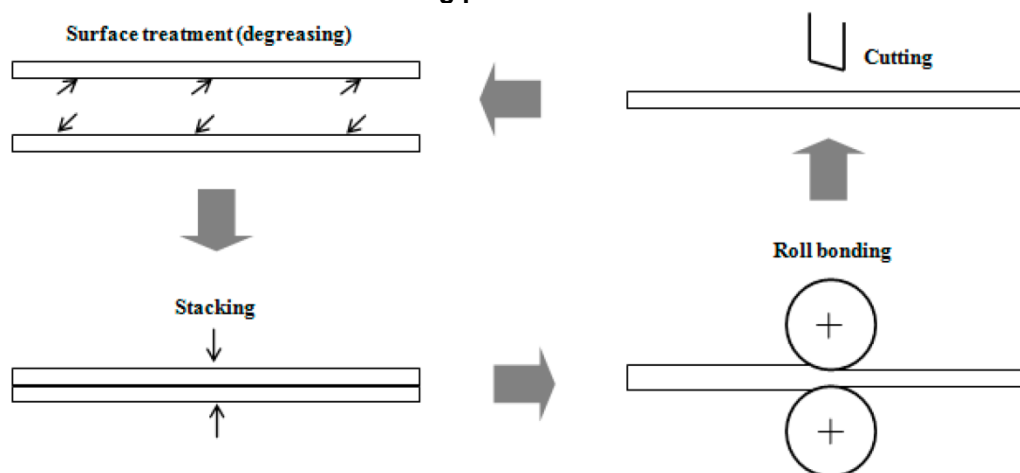
⁴⁷ Hot mills currently roll sheet at rates approaching 2,000 feet per minute (600 m/min). Cold mills can roll sheet at rates up to 7,000 feet per minute (2135 m/min) or more. Aluminum Association, “Rolling Aluminum: From the Mine to the Mill,” December 2007, p. 4-6. https://www.aluminum.org/sites/default/files/Rolling_Aluminum_From_The_Mine_Through_The_Mill.pdf, accessed March 11, 2021.

⁴⁸ Hearing transcript, pp. 194-195.

⁴⁹ Petitioners’ posthearing brief, pp. 70-74.

⁵⁰ Certain aluminum flat-rolled products such as coils can be sold as semi-finished product and further worked through re-rolling the metal. Product that is intended to be further worked through re-rolling can be sold to downstream facilities as re-roll stock or “hot-band sheet”. Because re-roll stock is a semi-finished product, it is given an F-temper designation, meaning that it is fabricated, but must undergo additional shaping, finishing, or thermal processes in order to be later designated as a finished temper product that can be used in downstream applications. During the re-roll process, the metal is passed through steel rollers again in order to reduce it to the desired level of thickness, and to adjust the strength of the aluminum. For subject re-roll CAAS this is done through “cold-working”. Depending on the intended end use application and alloying metal present, certain flat-rolled aluminum products can undergo an additional heat-treating process (i.e., annealing), however heat-treated aluminum sheet (e.g., 2XXX and 6XXX series alloys) is not covered by Commerce’s scope. During this process, the aluminum is heated to temperatures in excess of 600 degrees Fahrenheit in an annealing furnace in order to strengthen the metal. Certain aluminum alloys undergo a two-stage heat-treating process known as “solution heat-treatment and aging.” During this process, metal is heated to an extremely high temperature then rapidly cooled to room temperature. The metal then develops its full properties through a low-temperature aging process.

Figure I-3
Clad aluminum sheet: Roll-bonding process



Source: MDPI, “Microstructure Evolution and Mechanical Properties of Al-TiB₂/TiC In Situ Aluminum-Based Composites during Accumulative Roll Bonding (ARB) Process,” <http://www.mdpi.com:8080/1996-1944/10/2/109>, retrieved December 8, 2020.

Domestic like product issues

In the preliminary phase of these investigations, the petitioner proposed that there is a single domestic like product that is co-extensive with the scope of the investigations and also be defined as all CAAS consistent with the domestic like product definition adopted by the Commission in its recent investigation involving CAAS from China. Respondents did not contest the domestic like product definition for the preliminary phase of these investigations.

The Commission invited parties to identify any potential separate like products in their comments on the draft final phase questionnaires. Hulamin Operations Proprietary Limited (“Hulamin”), a foreign producer and exporter of re-roll stock, stated that re-roll stock (commercially known as “hot-band sheet”) should be treated as a separate category of product and requested that the Commission collect separate data on re-roll stock so that it can properly conduct its injury analysis.⁵¹ Oman Aluminium Rolling Company LLC (“OARC”) requested that the Commission’s final phase questionnaires solicit data that will permit it to segregate re-roll stock from imports of “true” CAAS, and also to evaluate whether imports of re-roll stock are, in fact, engaged in competition with the domestic like product.⁵² United Aluminum Corporation

⁵¹ Comments on Draft Questionnaires, Hulamin, p.3.

⁵² Comments on Draft Questionnaires, OARC, p.6.

("UAC") also requested that the Commission separately collect information on re-roll stock and endorsed the specific suggestions made by OARC to ensure that the Commission has an adequate record, and to evaluate whether imports of re-roll stock are, in fact, engaged in competition with the domestic like product.⁵³

Following a May 6, 2020 scope clarification request from respondents OARC, Hulamin, and UAC to exclude re-roll stock Commerce preliminarily determined that no change to the language of the scope is warranted with respect to OARC's, Hulamin's, and UAC's requests to exclude re-roll stock from the scope of the investigations.⁵⁴ In its final determination, Commerce continued to find no basis for excluding re-roll stock and confirmed that it is subject to the scope of the investigations.⁵⁵

The joint respondents' prehearing brief did not contest the Commission's preliminary definition of a single domestic like product consisting of all CAAS coextensive with the scope of the investigation as defined by Commerce and joint respondents did not raise a like product argument during the hearing.^{56 57} One respondent, OARC, presented arguments in their prehearing and posthearing briefs that the Commission should treat re-roll stock as a separate domestic like product from CAAS.⁵⁸

The Commission's questionnaires in these final phase investigations asked for U.S. producers and importers to provide U.S. shipment data for both final temper CAAS, and F temper, re-roll stock CAAS. Foreign producers were asked to provide production and exports to the United States quantities for both final temper CAAS, and F temper, re-roll stock CAAS. A new pricing product for re-roll stock (Alloy 1350, F Temper, 0.125" thick, 50" wide) was also added to the questionnaires. In addition, U.S. producers and purchasers were asked to compare these products using the factors which the Commission typically considers in regarding the five-factor "semifinished/finished products" test employed by the Commission: (1) uses; (2) markets; (3) characteristics and functions; (4) value; and (5) transformation processes. Factor comparison responses and information regarding these factors is discussed below, while detailed shipment data for these products reported by U.S. producers and importers are included in appendices E and F.

⁵³ Comments on Draft Questionnaires, UAC, pp.1-2.

⁵⁴ Commerce Preliminary Scope Memorandum, October 6, 2020.

⁵⁵ Commerce's Scope Comments Final Decision Memorandum, March 1, 2021.

⁵⁶ Respondents Joint Prehearing Brief, p.5.

⁵⁷ During the hearing, one respondent, Chart Industries Inc. ("Chart"), requested the "the Commission itself take a proactive role and find Chart's clad sheet to be a separate like product and exempt it from its final antidumping duty order."; Hearing transcript, p.226 (Hayward).

⁵⁸ OARC Prehearing Brief, pp. 10-17, OARC Posthearing Brief, pp. 5-8.

Intermediate products

The domestic like product proposed by petitioners includes the intermediate products (F temper, re-roll stock CAAS) as well as downstream products (final temper, O, H, W, T, or other non "F" tempers CAAS). The following discussion presents information on these products relating to the Commission's semifinished like product analysis. Factor comparison responses of U.S. producers and purchasers regarding differences and similarities between the intermediate and downstream products is presented in table I-24, while detailed narratives provided by U.S. producers and purchasers on these five factors are provided in tables I-25 and I-26.

Table I-24

CAAS: U.S. producers' and U.S. purchasers' responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Factor	Count of firms			
	U.S. producers		U.S. purchasers	
	No	Yes	No	Yes
Semi-finished product analysis.-- Other uses	10	---	36	4
Separate market	10	---	15	24
Differences in characteristics	---	10	10	28
Differences in cost	8	2	11	25
Transformation intensive	6	4	14	22

Source: Compiled from data submitted in response to Commission questionnaires.

Uses

Re-roll stock CAAS is dedicated entirely to the production of final temper CAAS. According to respondents Hulamin and OARC, re-roll stock with F-temper designation is an upstream, intermediate product that must be further rolled and processed to obtain the product characteristics of downstream CAAS products.

The Commission's U.S. producer questionnaires in these final phase investigations asked if there are uses for re-roll stock CAAS other than for the production of final temper CAAS. All 10 responding U.S. producers and 36 of 40 responding U.S. purchasers responded that there is not.

Markets

The Commission's U.S. producer and purchaser questionnaires in these final phase investigations asked if the market for re-roll stock CAAS is separate and distinct from the market for final temper CAAS. All 10 responding U.S. producers responded that there is not a separate and distinct market for the re-roll stock and final temper CAAS. However, 24 of 39 responding U.S. purchasers responded in the affirmative. Respondents OARC, Hulamin, and UAC did not provide arguments or data on markets served. Information on channels of distribution for re-roll stock CAAS and final temper CAAS is presented in appendix E.

Characteristics and functions

The Commission's U.S. producer and purchaser questionnaires in these final phase investigations asked if there are differences in the physical characteristics and functions of re-roll stock CAAS and final temper CAAS. All 10 U.S. responding producers and 28 of 38 responding U.S. purchasers responded affirmatively. U.S. producer responses stated that ***.

Respondent Hulamin stated that "F" temper products differ from sheet manufactured to meet other Aluminum Association temper standards in that "F" temper products have no specified mechanical properties. Unlike other tempers, "F" temper products do not have specific limits on mechanical properties under the Aluminum Association standards.⁵⁹

⁵⁹ Comments on Draft Questionnaires, Hulamin, p.2.

Value

The Commission's U.S. producer and purchaser questionnaires in these final phase investigations asked if there is a significant difference in the cost or value between re-roll stock CAAS and final temper CAAS. Two of 10 responding U.S. producers and 25 of 36 responding U.S. purchasers responded affirmatively. ***. U.S. purchaser responses included statements that ***.

Transformation processes

The Commission's U.S. producer and purchaser questionnaires in these final phase investigations inquired about the significance and extent of the processes that are used to transform the upstream product into the downstream product. Four of 10 responding U.S. producers and 22 of 36 responding U.S. purchasers described the processes used to transform re-roll stock CAAS into final temper CAAS as significant and particularly labor or capital intensive. ***. ***. ***. ***.

Respondent Hulamin states that re-roll stock has only been processed up to the point of hot-rolling and has not been subjected to cold-rolling.

Information regarding the manufacturing and fabrication of CAAS are presented above in the "manufacturing processes" section.

Table I-25

CAAS: U.S. producers' narrative responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Item / Firm	Narrative
U.S. producers: Differences in characteristics	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. producers: Differences in cost	
***	***
***	***
U.S. producers: Transformation processes	
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table I-26

CAAS: U.S. purchasers' narrative responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Item / Firm	Narrative
U.S. purchasers: Other uses	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. purchasers: Separate market	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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Table I-26--Continued

CAAS: U.S. purchasers' narrative responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Item / Firm	Narrative
U.S. purchasers: Separate market	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. purchasers: Differences in characteristics	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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Table I-26--Continued

CAAS: U.S. purchasers' narrative responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Item / Firm	Narrative
U.S. purchasers: Differences in characteristics	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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Table I-26--Continued

CAAS: U.S. purchasers' narrative responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Item / Firm	Narrative
U.S. purchasers: Differences in cost	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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Table I-26--Continued

CAAS: U.S. producers' narrative responses regarding the differences and similarities in F temper, re-roll stock CAAS and final temper CAAS

Item / Firm	Narrative
U.S. purchasers: Transformation processes	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Part II: Conditions of competition in the U.S. market

U.S. market characteristics

Common alloy aluminum sheet (“CAAS”) is a flat-rolled, sheet-gauge aluminum product. It can be produced in coils or in straight lengths and has a variety of uses depending on its gauge, alloy, temper, width, and finish.¹ CAAS is used in downstream products for the construction, automotive, electrical, marine, and aerospace industries.² These industries account for the vast majority of U.S. demand for CAAS.³ Each sector uses a wide product mix of CAAS.⁴ CAAS can be produced with or without cladding, although only a small minority of CAAS is clad. Non-clad CAAS is manufactured using one of three alloy series designated by the Aluminum Association – 1XXX-, 3XXX-, or 5XXX- series, and clad CAAS is manufactured using a 3XXX- series alloy.⁵ The U.S. market for CAAS is served by a large number of producers and importers,⁶ with imports from numerous sources. China was a major import source in 2017 and to a lesser degree in 2018; however, as discussed in Part I, Chinese-produced CAAS is currently subject to antidumping and countervailing duty orders.⁷

¹ Petition, p. 7.

² CAAS is used in products such as automotive body parts, tractor-trailers, gutters and down spouts, building facades, street signs and license plates, electrical boxes, and kitchen appliances. Hearing transcript, p. 32 (Olson).

³ *Common Alloy Aluminum Sheet from China, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final)*. USITC Publication 4861, January 2019 (“USITC Publication 4861”), p. II-1.

⁴ Petitioners’ postconference brief, Exhibit 1, pp. 43-44.

⁵ Petition, p. 7.

⁶ U.S. producers *** were also importers of CAAS. These firms’ U.S. producer responses are reported separately from their U.S. importer responses throughout this section. U.S. producer ***. These firms’ responses are reported separately. U.S. producer *** questionnaires. Importer and master distributor Ta Chen acquired U.S. producer Texarkana in October 2018. Prior to this, Texarkana was owned by U.S. producer Arconic. Declaration of Johnny Hsieh, Ta Chen International (April 2, 2020), p. 2.

⁷ Commerce self-initiated antidumping and countervailing duty investigations on CAAS from China in December 2017. Chinese CAAS is subject to antidumping margins of 49.85 percent for certain exporter-producers, and a China-wide margin of 59.72 percent. Subsidy rates for Chinese CAAS range from 46.48 percent to 116.49 percent for certain Chinese producers, and an all-others rate of 50.75 percent. 84 FR 2813, February 8, 2019; 84 FR 2157, February 6, 2019.

Apparent U.S. consumption of CAAS increased in both 2018 and 2019, with an overall increase of *** percent between 2017 and 2019. However, apparent U.S. consumption was 27.0 percent lower in January-September 2020 than in January-September 2019.

Impact of section 232 measures

CAAS has been subject to section 232 measures beginning on March 23, 2018, although exclusions for product from certain countries have been granted.⁸ Most U.S. producers (8 of 11)⁹ reported that the section 232 measures had no impact on the market for CAAS, while most importers (42 of 53)^{10 11} and purchasers (36 of 39)¹² reported that the 232 measures did have an impact on the market for CAAS. Firms that reported that section 232 measures did have an impact on the CAAS market were asked to respond to additional questions (table II-1).

Importers differed in most of their responses regarding the impact of the section 232 measures on the CAAS market, but pluralities of importers noted that domestic supply had increased and imported supply had decreased. The majority of responding importers reported that prices of CAAS had increased due to the section 232 measures.

⁸ The President announced tariffs of 10 percent ad valorem on U.S. imports of certain aluminum products, including CAAS, on March 8, 2018, and these tariffs went into effect on March 23, 2018. The President temporarily suspended section 232 measures on imports from Brazil, South Korea, and members of the European Union (“EU”), including subject countries Croatia, Germany, Greece, Italy, Romania, Slovenia, and Spain on March 22, 2018. The suspension of tariffs on aluminum imports from South Korea lapsed on April 30, 2018, and the suspension of tariffs on Brazil and EU countries lapsed on May 31, 2018. The President suspended tariffs on imports of aluminum from Canada and Mexico on May 19, 2019. Petition, p. 6.

⁹ The following analysis includes a total of 11 U.S. producers. In cases where not all U.S. producers have responded to specific questions, only the number of U.S. producers that responded to a specific question is presented.

¹⁰ Twenty-nine importers reported that they did not know if section 232 measures had an impact on the market.

¹¹ The following analysis includes a total of 88 importers (see Part I for additional information). In cases where not all importers have responded to specific questions, only the number of importers that responded to a specific question is presented.

¹² Ten purchasers reported that they did not know if section 232 measures had an impact on the market.

Table II-1
CAAS: U.S. producers and importers' responses to the impact of the section 232 measures on the CAAS market

Item	Increase	No change	Decrease	Fluctuate
Supply of U.S. produced CAAS.-- U.S. producers	2	---	1	---
Importers	19	13	10	7
Purchasers	8	13	9	8
Supply of imported CAAS.-- U.S. producers	1	1	1	---
Importers	11	14	17	6
Purchasers	4	13	10	7
Prices of CAAS.-- U.S. producers	2	---	1	---
Importers	37	5	2	5
Purchasers	33	1	---	4
Overall demand in the market for CAAS.-- U.S. producers	1	2	---	---
Importers	22	13	4	10
Purchasers	11	14	1	11
Raw material costs of scope merchandise.-- U.S. producers	1	---	---	1
Importers	20	9	1	14
Purchasers	14	3	1	17

Note: The majority of U.S. producers (8 of 11) responded that section 232 measures had no impact on the market for CAAS, as did 11 importers and 3 purchasers.

Note: Importers' responses regarding the impact of section 232 measures on the overall demand in the CAAS market are similar to their responses regarding demand trends; firms may have had difficulty distinguishing between the impact of section 232 measures and overall trends.

Source: Compiled from data submitted in response to Commission questionnaires.

Two U.S. producers and a plurality of importers reported that U.S. supply increased and that new mill capacity came on line as a result. A plurality of purchasers reported that both U.S. supply and the supply of imported CAAS remained unchanged. The 23 responding importers that reported no change or a decrease in U.S. supply as a result of the section 232 measures cited exclusions, insufficient U.S. capacity, and unavailability of specific products. In describing the effects of the section 232 measures, numerous importers reported that domestic mills increased prices and did not have the capacity or availability to supply the market. *** indicated that it was unable to buy domestic plate and sheet until the end of 2019.

Most responding U.S. producers, importers, and purchasers reported that the section 232 measures led to high prices of CAAS. However, U.S. producer *** reported that the

section 232 measures had a “direct impact”¹³ on the Midwest Premium (MWP)¹⁴ which it argued negatively impacted domestic producers, decreased U.S. supply, and increased the supply of imported CAAS. Several importers reported that any impact on supply or price was limited once exclusions were granted.

U.S. purchasers

The Commission received 52 usable questionnaire responses from firms that had purchased CAAS since January 2017.¹⁵ Of the 52 responding purchasers, 43 purchased domestic CAAS, and 41 purchased imports of the subject merchandise (Bahrain (18), Brazil (11), Croatia (7), Egypt (9), Germany (18), India (15), Indonesia (10), Italy (11), Oman (16), Romania (8), Serbia (1), Slovenia (6), South Africa (10), Spain (11), Taiwan (8), and Turkey (15)). Four

¹³ *** reported that section “232 tariffs had a direct impact on the Midwest Premium (MWP) increasing it to historic levels which negatively impacted domestic producers as we have to pay LME plus MWP and then charge our customers LME + MWP + Fabrications cost. Given importers do not have to pay MWP, they only pay LME, they are able to still sell at lower prices in the US.”

¹⁴ The Midwest premium is a daily premium added to the London Metal Exchange price applicable to U.S. producers of primary unwrought aluminum. See Part V for a discussion of the MWP and price.

¹⁵ The following firms provided purchaser questionnaire responses: ***.

purchasers reported purchases of imports from Canada, 14 from Greece, 14 from Korea, and 20 purchasers reported purchases of CAAS from other countries. Twenty-nine responding purchasers are distributors (or master distributors)¹⁶, 13 are end users,¹⁷ 8 are converters, and 8 identified themselves as another firm type including re-rollers, and OEMs.¹⁸ In general, responding U.S. purchasers were located in the Midwest and Southeast. The responding purchasers represented firms in a variety of domestic industries, including automotive, building, and HVAC. Large purchasers of CAAS include distributors *** and end users *** for ***.

Channels of distribution

U.S. producers sold about equally to distributors, converters, and end users in 2017, and sold an increasing portion to converters in 2019, although sales to distributors and end users were still sizeable.¹⁹ Generally, importers sold primarily to distributors and secondarily to other end users, as shown in table II-2. Importers reported that more than 80 percent of CAAS imported from eight subject countries²⁰ were shipped to distributors. Approximately *** of shipments of CAAS imported from Germany was to the transportation sector.

¹⁶ This includes one purchaser that identified as “other” but described itself as a master distributor.

¹⁷ End users reported purchasing CAAS to produce building materials, automotive heat exchangers, and HVAC.

¹⁸ One identified as an automotive OEM and one identified as an automotive end user, two identified as stampers, two as re-rollers, and one as an agent which, according to purchaser ***, unlike a distributor, it buys order-by-order rather than hold inventory.

¹⁹ Converters further process CAAS into re-rolled CAAS (likely both in- and out-of-scope products).

²⁰ ***.

Table II-2

CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, percent, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. producers: to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Subject sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Nonsubject sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All import sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
All sources: to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table II-2 -- Continued

CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, percent, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of U.S. shipments (percent)				
U.S. producers: to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Subject sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Nonsubject sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All import sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
All sources: to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table II-2 -- Continued

CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, percent, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of U.S. shipments (percent)				
U.S. importers: Bahrain to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Brazil to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Croatia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Egypt to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Germany to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: India to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Indonesia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table II-2 -- Continued

CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, percent, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of U.S. shipments (percent)				
U.S. importers: Italy, subject to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Oman to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Romania to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Serbia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Slovenia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: South Africa to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Spain to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table II-2 -- Continued

CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, percent, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of U.S. shipments (percent)				
U.S. importers: Taiwan to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Turkey to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Canada (nonsubject) to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Greece (nonsubject) to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Italy (nonsubject) to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Korea (nonsubject) to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All other sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Geographic distribution

U.S. producers and importers reported selling CAAS to all regions in the contiguous United States (table II-3). For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table II-3
CAAS: Geographic market areas in the United States served by U.S. producers and importers

Region	Northeast	Midwest	Southeast	Central Southwest	Mountains	Pacific Coast	Other	All regions (except Other)
U.S. producers	11	11	11	10	10	11	2	9
Subject sources:								
Bahrain	4	4	5	4	3	4	---	6
Brazil	7	7	7	6	---	2	---	8
Croatia	4	4	4	3	1	3	---	4
Egypt	5	5	6	4	2	4	---	6
Germany	6	11	14	7	5	7	---	16
India	11	10	11	8	5	10	1	17
Indonesia	4	4	4	5	4	4	1	5
Italy	10	11	12	6	5	8	---	17
Oman	10	8	11	5	4	6	---	11
Romania	5	7	7	6	2	5	1	8
Serbia	4	3	3	2	2	3	---	4
Slovenia	5	3	3	3	2	3	---	5
South Africa	6	5	6	4	3	4	---	7
Spain	8	8	10	6	5	7	2	12
Taiwan	3	5	2	2	2	4	1	7
Turkey	8	8	10	5	4	5	1	10
Subject sources	33	37	44	25	17	28	4	58

Note: All other U.S. markets, including AK, HI, PR, and VI.

Source: Compiled from data submitted in response to Commission questionnaires.

Supply and demand considerations

U.S. supply

Table II-4 provides a summary of the supply factors regarding CAAS from U.S. producers and from subject countries.

Table II-4

CAAS: Supply factors that affect the ability to increase shipments to the U.S. market

Item	Capacity (short tons)		Capacity utilization (percent)		Inventories as a ratio to total shipments (percent)		Shipments by market in 2019 (percent)		Able to shift to alternate products
	2017	2019	2017	2019	2017	2019	Home market shipments	Exports to non- U.S. markets	No. of firms reporting "yes"
United States	***	***	***	***	***	***	***	***	6 of 11
Bahrain	***	***	***	***	***	***	***	***	0 of 1
Brazil	***	***	***	***	***	***	***	***	3 of 3
Croatia	***	***	***	***	***	***	***	***	1 of 1
Egypt	***	***	***	***	***	***	***	***	1 of 1
Germany	***	***	***	***	***	***	***	***	2 of 4
India	***	***	***	***	***	***	***	***	2 of 3
Indonesia	***	***	***	***	***	***	***	***	0 of 0
Italy	***	***	***	***	***	***	***	***	3 of 6
Oman	***	***	***	***	***	***	***	***	1 of 1
Romania	***	***	***	***	***	***	***	***	0 of 1
Serbia	***	***	***	***	***	***	***	***	1 of 1
Slovenia	***	***	***	***	***	***	***	***	1 of 1
South Africa	***	***	***	***	***	***	***	***	1 of 1
Spain	***	***	***	***	***	***	***	***	1 of 3
Taiwan	***	***	***	***	***	***	***	***	1 of 1
Turkey	***	***	***	***	***	***	***	***	3 of 5
All subject sources	***	***	***	***	***	***	***	***	21 of 33

Note: Responding U.S. producers accounted for the vast majority of U.S. production of CAAS in 2019. Responding foreign producer/exporter firms accounted for 40 percent to 80 percent of production in six countries (***) and more than 80 percent for nine countries (***) during 2019. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, "Summary Data and Data Sources."

Source: Compiled from data submitted in response to Commission questionnaires.

Domestic production

Based on available information, U.S. producers of CAAS have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced CAAS to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity or inventories and the ability to shift shipments from alternate markets and inventories. Factors mitigating responsiveness of supply include a limited ability to shift production to or from alternate products.

Between 2017 and 2019, U.S. producers' CAAS capacity increased by *** percent, however, production did not match the increase in capacity, resulting in decreased capacity utilization. U.S. producers reported major export markets to be Canada and Mexico. Of the 11 responding U.S. producers, some reported that they can produce non-common alloy sheet (4 firms), aluminum can stock (1 firm), foil alloys (3 firms), plate alloys (1 firm), and other products (1 firm) on the same equipment used to produce CAAS.²¹ Factors affecting U.S. producers' ability to shift production include equipment and machinery constraints, technical requirements,²² and the alloy mix required.²³

Respondents cited *** and Harbor Aluminum publications stating that the U.S. industry has experience supply shortages and lack of capacity, in addition to section 232 exclusion requests specifically citing a lack of U.S. capacity.²⁴ ***.²⁵

Respondents stated that the constraining factor on production is the upstream hot mill and hot band capacity, which is the most expensive and complex process, rather than the downstream cold mill capacity.²⁶ Respondents also stated that two research companies in the industry estimate that domestic industry is operating at full capacity, and that as the domestic industry shifts towards the automotive body sheet and beverage can industries, CAAS capacity is displaced.²⁷ Petitioners responded that some automotive body sheet is in-scope product, that

²¹ Other products include: building products, conductors, heat shields, and HVAC (***) and blinds, building products, closures, electric components, and valve caps (***)

²² Technical requirements include gauge, temper, tolerance, flatness, surface, and finish (***) . *** also reported constraints due to finishing equipment.

²³ *** reported that it does not produce all alloys at certain plants.

²⁴ Respondents' joint prehearing brief, pp. 31-3, 50; OARC prehearing brief, pp. 7-9, and Exhibit 2; Alro S.A. prehearing brief, p. 2; Hulamin prehearing brief, p. 5.

²⁵ *** , February 2018, and *** , January 2021, provided in Respondents' joint prehearing brief, Exhibits 3D and 3H.

²⁶ Hearing transcript, pp. 166 (Woehlke), 252 (Ellis).

²⁷ Respondents' joint prehearing brief, pp. 2-3, 21; Hearing transcript, p. 167 (Woehlke), p. 181 (Douglas), p. 200 (Yannetti). Aluminum body sheet includes 5xxx series alloy (subject) and 6xxx series alloy (nonsubject). Respondent GARMCO stated that demand for out of scope aluminum products were "softer" than anticipated, so the U.S. industry offered price discounts to capture sales in the CAAS market. GARMCO prehearing brief, p. 9.

a limited number of U.S. producers serve the automotive sector, and that petitioners Constellium, JW Aluminum, and Texarkana, do not serve the automotive sector.²⁸

Subject imports from subject countries

Table II-4 provides a summary of supply of CAAS from subject countries and additional data are provided in Part VII. Producers of CAAS from subject countries have varying abilities to respond to changes in demand; generally, subject producers are able to respond to changes in demand with moderate-to-large changes in the quantity of shipments of CAAS to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused capacity, and an ability for subject producers to shift shipments from alternative markets. Factors mitigating responsiveness of supply include a limited ability to shift shipments from inventories, and a limited ability for some producers to shift production to or from alternate products.

CAAS production capacity decreased for four countries, including Germany,²⁹ and production capacity increased for five countries, including Italy (subject) and Turkey.³⁰ Production capacity remained constant during 2017-19 for six subject countries, including Spain.³¹ Most subject countries (9 of 15 responding³² - all except ***) had capacity utilization rates of more than 80 percent in 2019, and six of those countries (***) had capacity utilization rates of more than 90 percent.

Fourteen of the 15 responding subject countries had inventory-to-shipment ratios that were less than 10 percent of total shipments in 2019. Two of those subject countries, ***, reported inventory-to-shipment ratios that were less than 5 percent of total shipments. Producers in *** reported larger inventories, equivalent to *** percent of total shipments in 2019. Eleven of 15 subject countries had inventory-to-shipment ratios that were lower in 2019 than in 2017.

²⁸ Petitioners posthearing brief, Exhibit 1 Answers to Commissioner Questions, p. 95.

²⁹ Germany had the largest production capacity in 2019, accounting for more than *** percent of total CAAS capacity of all subject countries.

³⁰ Turkey had the second largest production capacity in 2019 and accounted for approximately *** percent and Italy had the third largest production capacity accounting for approximately *** percent of total production capacity of subject countries.

³¹ The Commission did not receive questionnaire responses from foreign producers in Indonesia.

³² This count does not include Indonesia because no foreign producers submitted questionnaire responses.

Lastly, seven subject countries, including those with the largest capacity (***) , exported approximately one-half³³ or more of their total shipments to non-U.S. markets in 2019, indicating that there is some ability to shift shipments from alternate markets. More than half of responding subject producers indicated that they were able to shift production from CAAS to other products.³⁴ Foreign producers reported that finishing line capacity, heat-treatment capability and capacity, machine technical abilities, and the cost and time required to shift production lines to other products are factors that limit shifting production to alternate products.

Imports from nonsubject sources

Imports from nonsubject sources accounted for *** percent of total U.S. imports in 2019. The largest sources of nonsubject imports during 2017-19 were Canada, China, Korea, and Greece.

Supply constraints

Five of 11 U.S. producers reported that they had refused, declined, or been unable to supply CAAS at some point since January 2017 and most purchasers (38 of 52) reported that they had been declined supply of CAAS. Most importers (51 of 92) reported that they had not refused, declined, or been unable to supply CAAS since January 2017. Most firms reporting supply constraints reported that shortages generally occurred during 2019 and 2020. Purchasers reported being declined supply by domestic producers generally (13 purchasers), U.S. producers Arconic (11), Aleris (11), Novelis (7), JW Aluminum (4), and Jupiter Aluminum (2). Purchasers also reported experiencing declined orders from foreign producers Constellium (5 purchasers), Ta Chen (China, Taiwan), Metal Exchange (India, Turkey, Indonesia, Germany), Medalco (Italy), and GARMCO (Bahrain).

Reasons for declining to supply CAAS reported by U.S. producers and importers include AD/CVD duties on China and that the preliminary determination by Commerce regarding subject imports had increased orders that they had been unable to fill; customer shipments were impacted by COVID-related shutdowns;³⁵ and unplanned operation downtime and

³³ German producers exported *** percent of its exports to non-U.S. markets.

³⁴ Some foreign producers reported being able to shift production from CAAS to other products including 6XXX and 8XXX series for automotive applications, 8XXX series alloys for sheets and coils, foil stock, closure stock for making pilfer-proof caps, circles for making cookware, and plates.

³⁵ Hearing transcript, p. 256 (Lutz).

outages. Importers also reported shortages related to COVID-19, lack of U.S. capacity, unavailability of specific alloys, and an inability to meet time requirements.

Importer *** reported that it had been *** and importer *** reported that there has been robust demand in Europe so it was highly selective in accepting new U.S. customers. Importers *** reported a lack of 3XXX and 5XXX alloys. Importer AKG stated that it had been declined supply from Arconic, JW Aluminum, and Novelis, and that insufficient U.S. supply was evidenced by accepted 232 exclusion requests based and inadequate supply of certain products by Department of Commerce.³⁶

New suppliers

Thirty-three of 52 purchasers indicated that new suppliers had not entered the U.S. market since January 1, 2017. The 19 purchasers that had reported new suppliers cited Texarkana (7 purchasers), Ta Chen-Texarkana (4), Aludium and Arconic (3), and Novelis Guthrie, Constellium Bowling Green, and Manaksia (India) (1 each).

U.S. demand

Based on available information, the overall demand for CAAS is likely to experience small-to-moderate changes in response to changes in price. The main contributing factors are the lack of substitute products and the varying cost share of CAAS in most of its end-use products. CAAS also has a small share in its ultimate end-use products, such as automobiles or residential and commercial construction. Different alloy series (i.e., alloy 1XXX, 3XXX, and 5XXX) have different product characteristics, making them less applicable for certain end uses and industries. As a result, different series may exhibit distinct demand patterns.

End uses and cost share

U.S. demand for CAAS depends on the demand for U.S.-produced downstream products. Reported end uses include automotive products, building and fabrication, and signs.

CAAS accounts for a varying share of the cost of the end-use products in which it is used. Reported cost shares for some end uses were as follows:

- Automotive sheet, 99 percent

³⁶ AKG final non-party brief, pp. 4, 6.

- Automotive parts, 80 to 97 percent³⁷
- Displays and signs, 20 to 95 percent
- Building and construction, less than 1 to 91 percent
- Roofing and flashing, 75 to 90 percent
- Gutters and downspouts, 64 to 90 percent
- General fabrication, 50 to 90 percent
- Siding and paneling for housing, trailers, 4 to 90 percent
- Transportation generally, 1 to 90 percent
- Consumer durables, 20 to 80 percent
- Lithographic printing plates, *** percent
- Radiators, *** percent
- HVAC and heat exchangers, 1 to 40 percent
- Aluminum heat exchangers, *** percent

Business cycles

Five of 11 U.S. producers, 60 of 83 importers, and 29 of 51 purchasers indicated that the market was not subject to business cycles or conditions of competition distinct to the CAAS market. However, several firms (including Turkish respondents)³⁸ reported seasonality in the construction, irrigation, HVAC, and recreational vehicle markets, with strong demand during the spring and summer, and weaker demand during the fall and winter months. Several firms reported the trade remedy investigations as distinct conditions of competition. Purchasers *** reported that automotive demand is a distinct condition of competition with *** reporting that when the automotive, truck, and trailer demand is strong, the limited domestic capacity tightens up quickly. Purchaser *** reported that industries outside of building and construction are increasingly consuming CAAS.

Four U.S. producers, 21 importers, and 23 purchasers reported that there had been changes to business cycles and distinct conditions of competition since 2017. Some U.S. producers cited imports from countries not subject to antidumping/countervailing duties. Purchasers cited increased prices and supply shortages due to lack of domestic availability, antidumping/countervailing duties, section 232 measures, and the COVID-19 pandemic. Some

³⁷ Firms reported automotive parts including heat shields, heaters, and automotive components and accessories.

³⁸ Turkish Producers' and Exporters' prehearing brief, p. 11.

purchasers and importers also reported that automotive, aerospace, and can stock end uses have reduced capacity for other end use markets.

Demand trends

U.S. demand for CAAS is driven primarily by the construction and automotive markets, as well as a number of other industries.³⁹ Petitioners and respondents stated that demand for CAAS was and is expected to remain strong, driven primarily by demand in construction.⁴⁰ Construction spending and auto production moved in opposite directions during January 2017 to December 2020, with construction spending increasing and auto production decreasing. The decrease in auto production was of greater magnitude than the increase in construction spending. Notably, there were large declines in auto production during the spring of 2020, which coincide with COVID-19 related shutdowns. Petitioners stated COVID-related impacts were felt between the second and third quarters of 2020 and that the pandemic did not have any lasting negative impact.⁴¹

Between January 2017 and September 2020, the seasonally adjusted total value of construction put in place increased by 12.8 percent and continued to increase from September through December 2020 by 4.7 percent (figure II-1).

From January 2017 to September 2020, seasonally adjusted domestic auto production decreased by 29.4 percent, and continued to decrease through December 2020 by 10.8 percent (figure II-2). However, the auto industry has shifted towards using more aluminum per car to reduce weight and increase fuel economy, energy efficiency, and reduce emissions.⁴² During the spring of 2020, domestic production all but stopped, but even after a recovery during the summer, production continued to decline.

³⁹ *Common Alloy Aluminum Sheet from China. Inv. Nos. 701-TA-591 and 731-TA-1399 (Final)*. USITC Publication 4861, January 2019, p. II-6.

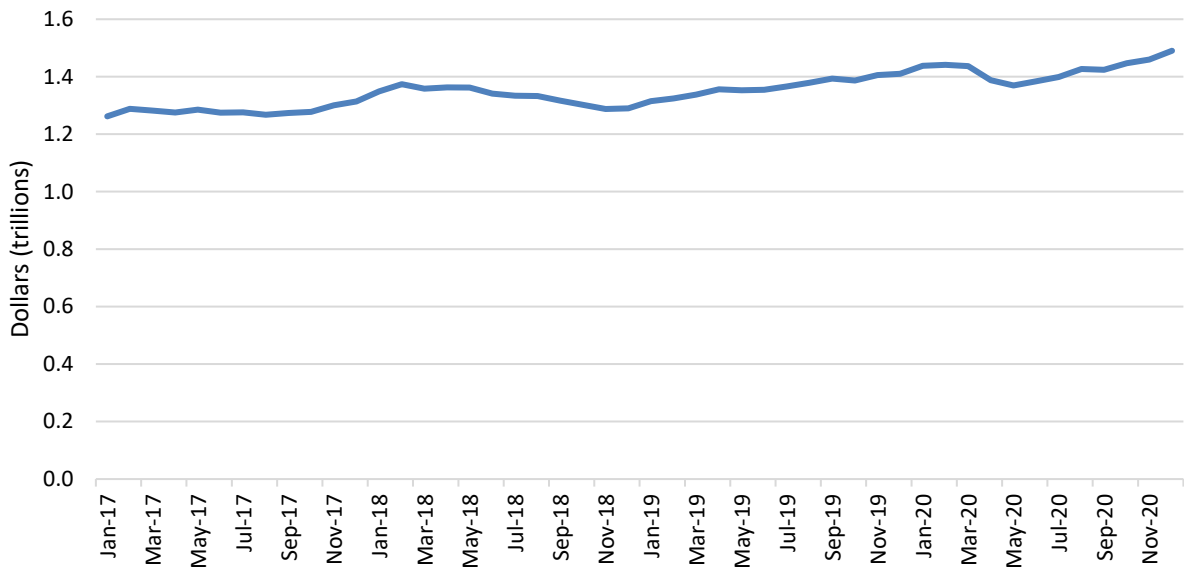
⁴⁰ OARC prehearing brief, pp. 5-6; Hearing transcript, p. 80 (Stemple).

⁴¹ Petitioners' prehearing brief, p. 82; Hearing transcript, pp. 80, 82 (Vrablec, Hsieh).

⁴² Gregory Barker. "The hidden carbon footprint of aluminum cars." *Automotive News*. (July 22, 2019). Retrieved April 7, 2020 <https://www.autonews.com/commentary/hidden-carbon-footprint-aluminum-cars>.

Figure II-1

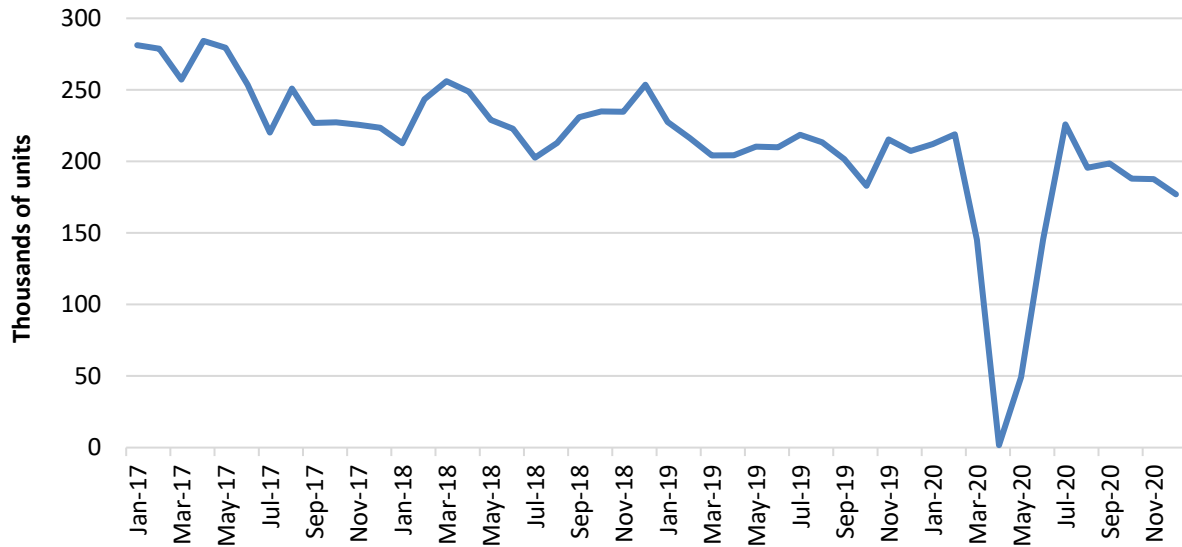
Construction spending: Total value of construction put in place in the United States, seasonally adjusted annual rate, monthly, January 2017-December 2020



Source: Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/series/TTLCONS>, retrieved February 9, 2021.

Figure II-2

Domestic auto production: Thousands of units, monthly, seasonally adjusted, monthly, January 2017-December 2020



Source: Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/series/DAUPSA>, retrieved February 9, 2021.

A plurality of firms reported an increase in U.S. demand for CAAS since January 1, 2017 (table II-5), and many firms reported that demand fluctuated over the period.

Table II-5
CAAS: Firms' responses regarding U.S. demand and demand outside the United States

Item	Number of firms reporting			
	Increase	No change	Decrease	Fluctuate
Demand inside the United States:				
U.S. producers	8	1	---	2
Importers	26	10	5	30
Purchasers	23	9	3	12
Demand outside the United States:				
U.S. producers	2	1	1	4
Importers	14	7	10	24
Purchasers	9	9	---	10
Demand for end use product(s):				
Purchasers	12	5	3	4

Source: Compiled from data submitted in response to Commission questionnaires.

Substitute products

Substitutes for CAAS are limited. Most responding U.S. producers (9 of 10), importers (68 of 74), and purchasers (44 of 49) reported that there were no substitutes. Steel and carbon are possible substitutes for certain automotive or structural applications; vinyl is a possible substitute for trim and downspout coils, and copper is a possible substitute for HVAC, transformer windings, and grounding bars. U.S. producer *** and U.S. importers *** reported that changes in the price of steel, vinyl, and carbon have affected the price of CAAS.

Substitutability issues

The degree of substitution between domestic and imported CAAS depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is moderate-to-high degree of substitutability between domestically produced CAAS and CAAS imported from subject sources. The main factor limiting substitutability would be the availability of CAAS from domestic producers.

Lead times

CAAS is primarily produced-to-order. U.S. producers reported that 89.2 percent their commercial shipments were produced-to-order with lead times averaging 41 days. The remaining 10.8 percent of their commercial shipments came from inventories, with lead times averaging 8 days. U.S. importers reported that 77.0 percent of their commercial shipments were produced-to-order with lead times averaging 104 days and 21.7 percent of their commercial shipments were sold from their U.S. inventories with average lead times of 6 days. The remaining 1.4 percent of their commercial shipments were sold from foreign inventories with average lead times of 63 days.

Knowledge of country sources

Forty-five purchasers indicated they had marketing/pricing knowledge of domestic product. Purchasers reported knowledge of CAAS from Bahrain (19), Brazil (13), Croatia (5), Egypt (8), Germany (16), Greece (17), India (18), Indonesia (12), Italy (12), Korea (14), Oman (15), Romania (8), Serbia (1), Slovenia (5), South Africa (16), Spain (12), Taiwan (7), and Turkey (17). Nine purchasers reported having knowledge of CAAS from nonsubject source Canada and 16 reported knowledge of CAAS imported from other country sources.

As shown in table II-6, most purchasers and their customers sometimes make purchasing decisions based on the producer and never make purchasing decisions based on the country of origin. The six purchasers that reported that they or their customers always make decisions based the manufacturer cited quality and an ability to meet strict specifications.

Table II-6
CAAS: Purchasing decisions based on producer and country of origin

Decision	Always	Usually	Sometimes	Never
Purchases based on producer:				
Purchaser's decision	6	11	20	17
Purchaser's customer's decision	1	1	24	19
Purchases based on country of origin:				
Purchaser's decision	2	12	13	26
Purchaser's customer's decision	---	3	17	24

Source: Compiled from data submitted in response to Commission questionnaires.

Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for CAAS were quality (48 firms), price (41 firms), availability and continuity of supply (24 firms), lead time and prompt delivery (23 firms), and requirements (6 firms) as shown in table II-7. Quality was the most frequently cited first-most important factor (cited by 25 firms), followed by price (15 firms); quality was also the most frequently reported second-most important factor (16 firms); and price was the most frequently reported third-most important factor (14 firms).

The majority of purchasers (28 of 51) reported that they sometimes purchase the lowest-priced product, and 21 purchasers reported that they usually purchase the lowest-priced product. One purchaser reported that it always purchases the lowest-priced product and one reported that it never purchases the lowest-priced product.

Table II-7

CAAS: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Factor	First	Second	Third	Total
Quality	25	16	7	48
Price	15	12	14	41
Availability/continuity of supply	10	8	6	24
Lead time/prompt delivery	1	9	13	23
Requirements	3	0	3	6
Other	0	6	9	15

Note: Other factors listed include service, ease of doing business, and strategic support (5), dependability, credit terms and contracts (5), consistency (3), product range (3), and sustainability, service, location, capacity, flexibility, ethical behavior, existing relationships (1 each).

Source: Compiled from data submitted in response to Commission questionnaires.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 17 factors in their purchasing decisions (table II-8). The factors rated as very important by more than half of responding purchasers were availability (51 purchasers), quality meets industry standards (48), reliability of supply (48), product consistency (46), price (40), delivery time (39), and finish (36).

Table II-8**CAAS: Importance of purchase factors, as reported by U.S. purchasers, by factor**

Factor	Number of firms reporting		
	Very	Somewhat	Not
Availability	51	---	---
Delivery terms	25	22	4
Delivery time	39	11	1
Discounts offered	11	19	20
Finish	36	14	1
Minimum quantity requirements	16	21	13
Packaging	22	23	6
Payment terms	17	27	6
Price	40	10	1
Product consistency	46	4	1
Product range	19	25	6
Quality meets industry standards	48	3	---
Quality exceeds industry standards	25	21	5
Reliability of supply	48	3	---
Size range	18	30	2
Technical support/service	21	27	3
U.S. transportation costs	21	25	6

Source: Compiled from data submitted in response to Commission questionnaires.

Supplier certification

Thirty-seven of 52 responding purchasers require their suppliers to become certified or qualified to sell CAAS to their firm. Purchasers reported that the time to qualify a new supplier ranged from 10 days to two years.⁴³ Several purchasers reported that approval or certification consisted of a product trial or inspection to ensure that CAAS was the required quality or had the required factors, such as flatness, packaging, or compatibility with other materials. Other purchasers reported that they required suppliers to meet industry or third-party standards. Purchaser *** reported that it required suppliers to meet the *** standard, *** required suppliers to undergo a ***, and *** required suppliers to follow the *** process for aluminum sheet in order to qualify as a supplier. Seven purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify CAAS or had lost its approved status since 2017.

⁴³ Purchasers Chart Industries and Mitsubishi Chemical stated that qualification of a new supplier could take a year or more. Hearing transcript, pp. 192-3 (Hayward), p. 233 (Hayward and Yannetti).

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2017 (table II-9). Purchaser responses on changes to purchasing patterns on CAAS were mixed, with a plurality (15 of 49) reporting that their purchases of U.S.-produced CAAS increased. Thirteen purchasers reported that their purchases had fluctuated, and 12 purchasers reported that their purchases had remained constant. Purchasers that reported increased purchases of CAAS generally reported that increases occurred because of section 232 measures, increased production in the automotive industry, and as a result of antidumping and countervailing duties on Chinese CAAS. Purchasers who reported fluctuating purchases of U.S.-produced CAAS reported that at times there was limited availability of supply of U.S.-produced CAAS or varying demand for the end-use products that require CAAS.

The majority of purchasers reported changes in purchasing patterns from a limited number of subject countries.⁴⁴ Purchasers that reported increased purchases of CAAS from subject countries generally reported that there was insufficient supply of domestically produced CAAS or that new suppliers had entered the market. Purchasers that reported decreased purchases of subject CAAS reported that increased duties or prices had driven their decision.

⁴⁴ Seventeen purchasers reported purchasing from only one subject source and nine purchasers reported having purchased CAAS from eight or more subject countries since 2017. The remaining purchasers reported purchasing from two to five subject countries.

Table II-9
CAAS: Changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States	5	4	15	12	13
Bahrain	18	8	2	5	3
Brazil	20	5	2	1	2
Croatia	24	---	2	2	2
Egypt	22	1	4	1	2
Germany	19	2	7	2	4
India	19	5	5	---	6
Indonesia	22	2	3	---	3
Italy	21	2	4	---	4
Oman	20	5	7	---	2
Romania	25	---	5	---	1
Serbia	28	---	1	---	---
Slovenia	27	---	1	---	2
South Africa	20	2	2	1	4
Spain	19	1	7	1	1
Taiwan	22	---	5	1	1
Turkey	17	3	10	1	---
Canada	22	3	1	2	1
Greece	20	5	2	3	3
Korea	21	2	3	---	8
All other countries	13	9	3	3	4
Sources unknown	13	3	2	1	3

Source: Compiled from data submitted in response to Commission questionnaires.

Importance of purchasing domestic product

Twenty of 52 purchasers reported that all of their purchases did not require purchasing U.S.-produced product.⁴⁵ Seventeen reported that domestic product was required by law (for less than 25 percent of their purchases), 19 reported it was required by their customers (ranging from 0.1 percent to 99.9 percent of their purchases), and 8 reported other preferences for domestic product. Reasons cited for preferring domestic product included: quality or grades requested by customers, or sole sourcing requirements.

Comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing CAAS produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-

⁴⁵ Forty-five purchasers reported that at least some of their purchases did not have any domestic requirement, with the vast majority of firms reporting that at least 75 percent of their purchases had no domestic requirement.

by-country comparison on the same 17 factors (table II-10) for which they were asked to rate the importance. Purchasers compared domestic product to imported CAAS from Bahrain (18 purchasers), Brazil (11), Croatia (3), Egypt (9), Germany (17), India (18), Indonesia (11), Italy (10), Oman (14), Romania (6), Serbia (1), Slovenia (2), South Africa (14), Spain (11), Taiwan (10), and Turkey (14). A plurality of purchasers reported that U.S.-produced CAAS and CAAS imported from Bahrain, Germany, and Italy were comparable in all 17 factors. The plurality of purchasers comparing U.S.-produced CAAS with CAAS from Oman, Romania, Taiwan, and Turkey reported that these products were comparable in all factors with the exception of delivery time, for which U.S.-produced CAAS was superior. For the remaining country comparisons, U.S.-produced CAAS was considered superior in multiple factors including: availability, delivery terms, delivery time, payment terms, price, product range, reliability of supply, size range, and technical support.⁴⁶

Table II-10
CAAS: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Bahrain			United States vs. Brazil			United States vs. Croatia		
	S	C	I	S	C	I	S	C	I
Availability	5	13	---	4	5	2	1	2	---
Delivery terms	2	15	1	2	8	1	1	2	---
Delivery time	7	8	3	3	5	3	1	2	---
Discounts offered	1	15	1	1	9	---	---	2	---
Finish	1	15	2	2	7	2	---	3	---
Minimum quantity requirements	1	17	---	1	10	---	1	2	---
Packaging	---	16	2	---	10	1	---	3	---
Payment terms	1	16	---	1	9	---	1	1	---
Price	1	11	4	1	7	2	---	2	---
Product consistency	1	15	2	3	6	2	---	3	---
Product range	3	13	2	4	4	3	2	1	---
Quality meets industry standards	---	18	---	2	7	2	---	3	---
Quality exceeds industry standards	1	15	1	3	5	2	---	2	---
Reliability of supply	6	11	1	4	5	2	1	2	---
Size range	4	13	1	5	5	1	2	1	---
Technical support/service	3	13	1	6	3	1	1	2	---
U.S. transportation costs	2	8	3	2	7	---	---	1	---

Table continued on next page.

⁴⁶ For comparisons of U.S.-produced CAAS and CAAS imported from nonsubject sources Greece, Korea, and other countries, and for comparisons between CAAS imported from subject countries, please see Appendix G.

Table II-10 -- Continued
CAAS: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Egypt			United States vs. Germany			United States vs. Greece (nonsubject)		
	S	C	I	S	C	I	S	C	I
Availability	3	6	---	5	8	4	5	7	1
Delivery terms	3	6	---	4	12	1	5	7	1
Delivery time	5	4	---	7	9	1	7	3	1
Discounts offered	---	8	---	---	15	2	---	12	---
Finish	2	7	---	---	16	1	2	11	---
Minimum quantity requirements	2	7	---	2	12	3	2	10	1
Packaging	1	8	---	---	16	1	---	13	---
Payment terms	1	8	---	1	15	1	---	13	---
Price	1	5	3	2	11	4	1	9	3
Product consistency	3	6	---	---	15	2	1	12	---
Product range	5	3	1	2	10	5	2	10	1
Quality meets industry standards	2	7	---	---	15	2	---	13	---
Quality exceeds industry standards	3	5	---	1	13	2	1	11	---
Reliability of supply	5	4	---	4	11	2	4	8	1
Size range	4	5	---	4	10	3	2	11	---
Technical support/service	6	2	1	3	11	3	4	8	1
U.S. transportation costs	2	6	---	3	11	2	3	8	1
Factor	Number of firms reporting								
	United States vs. India			United States vs. Indonesia			United States vs. Italy		
	S	C	I	S	C	I	S	C	I
Availability	7	10	1	3	6	2	2	7	1
Delivery terms	6	12	---	3	7	1	3	5	2
Delivery time	8	7	3	4	5	2	3	5	2
Discounts offered	1	13	2	---	8	1	---	8	---
Finish	2	15	1	2	8	1	1	9	---
Minimum quantity requirements	1	16	1	1	8	2	1	7	2
Packaging	1	16	1	1	8	2	---	10	---
Payment terms	3	14	1	1	10	---	1	9	---
Price	2	9	7	1	6	4	1	9	---
Product consistency	5	13	---	2	7	2	2	8	---
Product range	6	12	---	3	6	2	4	5	1
Quality meets industry standards	2	16	---	2	9	---	1	9	---
Quality exceeds industry standards	2	13	1	1	8	1	1	8	---
Reliability of supply	10	8	---	4	6	1	3	6	1
Size range	9	9	---	5	4	2	4	5	1
Technical support/service	7	8	1	7	2	2	3	6	1
U.S. transportation costs	3	14	---	3	7	---	2	7	---

Table continued on next page.

Table II-10-- Continued
CAAS: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Korea (nonsubject)			United States vs. Oman			United States vs. Romania		
	S	C	I	S	C	I	S	C	I
Availability	4	8	1	5	7	2	2	4	---
Delivery terms	6	5	2	3	10	1	2	4	---
Delivery time	8	3	2	6	6	2	3	3	---
Discounts offered	---	12	---	1	11	---	1	5	---
Finish	---	10	2	1	12	1	---	6	---
Minimum quantity requirements	2	10	1	1	12	1	1	4	1
Packaging	1	11	1	---	13	1	---	6	---
Payment terms	---	13	---	---	13	1	---	6	---
Price	1	11	1	---	11	3	---	6	---
Product consistency	2	10	1	---	12	2	---	6	---
Product range	6	6	1	2	10	1	2	4	---
Quality meets industry standards	1	12	---	---	14	---	---	6	---
Quality exceeds industry standards	2	11	---	---	11	2	---	6	---
Reliability of supply	5	8	---	3	9	2	1	5	---
Size range	6	6	1	2	11	1	2	4	---
Technical support/service	5	7	1	4	9	1	1	4	1
U.S. transportation costs	3	8	2	1	12	1	2	4	---
Factor	Number of firms reporting								
	United States vs. Serbia			United States vs. Slovenia			United States vs. South Africa		
	S	C	I	S	C	I	S	C	I
Availability	***	***	***	---	2	---	5	9	---
Delivery terms	***	***	***	---	2	---	4	10	---
Delivery time	***	***	***	---	2	---	9	4	1
Discounts offered	***	***	***	---	2	---	---	11	2
Finish	***	***	***	---	2	---	2	12	---
Minimum quantity requirements	***	***	***	---	2	---	1	13	---
Packaging	***	***	***	---	2	---	---	13	1
Payment terms	***	***	***	---	2	---	2	12	---
Price	***	***	***	1	1	---	1	7	6
Product consistency	***	***	***	---	2	---	1	13	---
Product range	***	***	***	1	1	---	4	10	---
Quality meets industry standards	***	***	***	---	2	---	---	14	---
Quality exceeds industry standards	***	***	***	---	2	---	1	12	---
Reliability of supply	***	***	***	---	2	---	7	7	---
Size range	***	***	***	1	1	---	5	9	---
Technical support/service	***	***	***	---	1	1	7	7	---
U.S. transportation costs	***	***	***	1	1	---	5	6	2

Table continued on next page.

Table II-10--Continued
CAAS: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Spain			United States vs. Taiwan			United States vs. Turkey		
	S	C	I	S	C	I	S	C	I
Availability	5	5	1	3	6	1	3	10	1
Delivery terms	3	7	1	4	5	1	3	8	3
Delivery time	7	3	---	5	4	1	5	5	4
Discounts offered	---	11	---	---	9	---	---	11	2
Finish	1	9	1	1	8	1	2	10	2
Minimum quantity requirements	2	9	---	1	8	1	1	11	2
Packaging	---	10	1	---	10	---	1	12	1
Payment terms	2	9	---	1	9	---	2	12	---
Price	1	8	2	1	6	3	3	6	5
Product consistency	2	8	1	1	9	---	1	13	---
Product range	6	3	1	4	5	1	3	9	2
Quality meets industry standards	3	8	---	1	9	---	1	13	---
Quality exceeds industry standards	2	8	---	2	7	---	2	10	1
Reliability of supply	6	5	---	3	6	1	5	8	1
Size range	6	4	1	2	8	---	3	10	1
Technical support/service	4	7	---	3	5	2	4	7	3
U.S. transportation costs	2	6	2	3	6	---	3	9	1

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Note: S=first listed country's product is superior; C=both countries' products are comparable; I=first list country's product is inferior.

Source: Compiled from data submitted in response to Commission questionnaires.

Comparison of U.S.-produced and imported CAAS

In order to determine whether U.S.-produced CAAS can generally be used in the same applications as imports from subject countries, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-11, the vast majority of U.S. producers reported that U.S. product was always interchangeable with imported CAAS from subject countries. Most importers and purchasers reported that U.S.-produced CAAS and imported CAAS from subject sources were always or frequently interchangeable.

Table II-11

CAAS: Interchangeability between CAAS produced in the United States and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
United States vs. Bahrain	9	---	---	---	8	14	1	1	7	5	4	---
United States vs. Brazil	10	---	---	---	9	8	3	1	5	3	4	---
United States vs. Croatia	9	---	---	---	6	5	1	1	3	---	1	---
United States vs. Egypt	9	---	---	---	8	7	3	1	5	2	2	---
United States vs. Germany	9	---	---	---	9	9	8	5	6	7	4	1
United States vs. India	10	---	---	---	7	15	4	1	8	3	7	---
United States vs. Indonesia	9	---	1	---	8	7	4	1	7	2	4	---
United States vs. Italy	10	---	---	---	12	14	2	1	5	5	2	---
United States vs. Oman	10	---	---	---	8	11	3	1	6	7	2	---
United States vs. Romania	9	---	---	---	8	6	2	1	3	1	2	---
United States vs. Serbia	9	---	---	---	6	6	2	1	2	---	---	---
United States vs. Slovenia	9	---	---	---	7	6	1	1	3	2	---	---
United States vs. South Africa	9	---	---	---	8	8	4	2	6	3	6	---
United States vs. Spain	9	---	1	---	10	10	4	2	3	5	5	---
United States vs. Taiwan	9	---	---	---	7	7	2	2	---	---	---	---
United States vs. Turkey	9	---	1	---	11	9	4	1	6	4	7	1

Note: A=Always, F=Frequently, S=Sometimes, N=Never.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producer *** reported that CAAS from the United States and certain subject countries is only sometimes interchangeable because large width hot band is not readily available in the United States. Importers reporting that imported CAAS from subject countries is only sometimes or never interchangeable with U.S.-produced CAAS included reasons such as: the only suppliers of *** CAAS are located in China, Germany, Great Britain, and Japan; a willingness of subject sources to produce small quantities; an ability to meet auto customers' specific requirements and qualifications; and the availability of specific alloys.

U.S. importer *** reported that CAAS produced in India and Italy is of higher quality, produced to better grades and standards, have lower defect rates and better product services including better conditions of sale and a willingness to meet specific customer requests. U.S. importer *** reported that it imports specialty bright surface aluminum sheets from Spain and Germany and that U.S. products lack the bright and reflective optical characteristics that it requires. Purchasers *** also reported differences in cosmetic finishes.

As can be seen from table II-12, 30 responding purchasers reported that domestically produced product usually met minimum quality specifications. Similarly, most, or at least a plurality, of responding purchasers reported that CAAS imported from each subject source usually met minimum quality specifications.

Table II-12
CAAS: Ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't know
United States	14	30	---	2	3
Bahrain	8	9	1	1	17
Brazil	---	7	5	---	23
Croatia	---	3	---	---	32
Egypt	---	6	2	2	25
Germany	8	11	2	---	21
India	4	10	4	2	18
Indonesia	2	7	3	1	22
Italy	1	10	2	1	23
Oman	4	8	2	---	23
Romania	2	3	---	---	31
Serbia	1	---	---	---	32
Slovenia	1	3	---	---	30
South Africa	2	11	3	1	19
Spain	2	8	4	1	21
Taiwan	2	7	1	1	24
Turkey	5	6	5	1	20
Canada (nonsubject)	3	7	---	---	26
Greece (nonsubject)	3	13	---	1	20
Korea (nonsubject)	5	8	---	1	22
All other countries	6	3	2	---	13

Note: Purchasers were asked how often domestically produced or imported CAAS meets minimum quality specifications for their own or their customers' uses.

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CAAS from the United States, subject, or nonsubject countries. As seen in table II-13, all U.S. producers reported that factors other than price are never significant, with the exception of U.S. producer *** that reported factors other than price were frequently significant when comparing CAAS from the United States and CAAS from Spain because large width hot band is not readily available in the United States. Most importers and purchasers reported that factors other than price were sometimes or never significant. However, importers and purchasers reporting that these factors were always or frequently significant cited similar factors in regards to interchangeability: the only suppliers of *** CAAS are located in China, Germany, Great Britain, and Japan; a willingness of subject sources to produce small quantities; an ability to meet auto customers' specific requirements and qualifications; and the availability of specific alloys.

Table II-13

CAAS: Significance of differences other than price between CAAS produced in the United States and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
United States vs. Bahrain	---	---	---	10	3	3	11	8	2	3	9	2
United States vs. Brazil	---	---	---	10	1	2	8	8	2	---	10	1
United States vs. Croatia	---	---	---	10	1	1	5	7	1	---	3	1
United States vs. Egypt	---	---	---	10	1	1	9	8	2	1	6	1
United States vs. Germany	---	---	---	10	8	4	10	9	6	3	7	3
United States vs. India	---	---	---	10	2	3	13	8	3	2	11	3
United States vs. Indonesia	---	---	---	10	1	1	9	7	2	4	6	2
United States vs. Italy	---	---	---	10	5	4	10	10	2	4	6	1
United States vs. Oman	---	---	---	10	2	4	10	7	2	3	5	5
United States vs. Romania	---	---	---	10	2	---	7	7	---	1	5	1
United States vs. Serbia	---	---	---	10	1	1	6	8	---	---	2	1
United States vs. Slovenia	---	---	---	10	1	2	7	7	1	---	4	1
United States vs. South Africa	---	---	---	10	4	2	9	8	3	2	10	1
United States vs. Spain	---	1	---	9	5	2	9	9	2	1	10	1
United States vs. Taiwan	---	---	---	10	1	2	6	7	1	4	5	2
United States vs. Turkey	---	---	---	10	4	5	8	8	3	3	8	3

Note: A = Always, F = Frequently, S = Sometimes, N = Never.

Source: Compiled from data submitted in response to Commission questionnaires.

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates.

U.S. supply elasticity

The domestic supply elasticity for CAAS measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CAAS. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced CAAS. Respondents commented that the estimated range of 5 to 7 in the prehearing report overestimated the domestic industry's ability to supply additional volumes to the U.S. market,⁴⁷ given the numerous 232 exclusion requests and industry publications citing insufficient capacity and supply to satisfy the U.S. CAAS market.

⁴⁷ Respondents' joint prehearing brief, pp. 66-67.

Analysis of these factors above as well as revised capacity data indicates that the U.S. industry has the ability to shift between CAAS and other products to moderately increase or decrease shipments to the U.S. market; a revised estimate in the range of 3 to 5 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for CAAS measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CAAS. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CAAS in the production of any downstream products. Based on the available information, the aggregate demand for CAAS is likely to be very inelastic; a range of -0.25 to -0.5 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.⁴⁸ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced CAAS and imported CAAS is likely to be high, and in the range of 4 to 8.

⁴⁸ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in *Part I* of this report and information on the volume and pricing of imports of the subject merchandise is presented in *Part IV* and *Part V*. Information on the other factors specified is presented in this section and/or *Part VI* and (except as noted) is based on the questionnaire responses of 11 firms that accounted for the vast majority of U.S. production of CAAS during 2019.

U.S. producers

The Commission issued a U.S. producer questionnaire to 13 firms based on information contained in the petition and industry sources. Eleven firms provided usable data on their operations.¹ Staff believes that these responses represent vast majority of U.S. production of CAAS.

Table III-1 lists U.S. producers of CAAS, their production locations, positions on the petition, and shares of total production.

¹ Aleris and Commonwealth (formerly Aleris) provided a single questionnaire response in the preliminary phase of these investigations as Aleris Rolled Products, Inc. *** and two unsolicited firms, ***, reported that they did not produce CAAS in the United States since January 1, 2017. Two firms did not respond to the Commission questionnaire request but are estimated by staff to account for less than *** percent of U.S. production. See also Petition, p.4.

Table III-1

CAAS: U.S. producers, their position on the petition, location of production, and share of reported production, 2019

Firm	Position on petition	Production location(s)	Share of production (percent)
Aleris	Petitioner	Uhrichsville, OH Richmond, VA Davenport, IA (2) Lincolnshire, IL Ashville, OH Clayton, NJ	***
Arconic	Petitioner	Bettendorf, IA Lancaster, PA Alcoa, TN Elmendorf, TX	***
Commonwealth (formerly Aleris)	***	Lewisport, KY	***
Constellium	Petitioner	Ravenswood, WV	***
Golden	***	Fort Lupton, CO	***
Granges	***	Huntingdon, TN Salisbury, NC Newport, AR	***
Jupiter	***	Hammond, IN	***
JW Aluminum	Petitioner	Goose Creek, SC Russellville, AR	***
Novelis	Petitioner	Oswego, NY Russellville, KY	***
Texarkana	Petitioner	Texarkana, TX	***
Vulcan	***	Foley, AL	***
Total			100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2

CAAS: U.S. producers' ownership, related and/or affiliated firms

Item / Firm	Firm Name	Affiliated/Ownership
Ownership:		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued on next page.

As indicated in table III-2, six U.S. producers (***) are related both to foreign producers and to U.S. importers of CAAS. U.S. producer *** is also related to foreign producers of CAAS. In addition, as discussed in greater detail below in tables III-10 and III-12, seven U.S. producers directly import CAAS and five purchase CAAS from U.S. importers and other domestic producers.

Table III-3 presents U.S. producers' reported changes in operations since January 1, 2017.

**Table III-3
CAAS: U.S. producers' reported changes in operations, since January 1, 2017**

Item / Firm	Reported changes in operations
Plant openings:	
***	***
***	***
Plant closings:	
***	***
Expansions:	
***	***
***	***
***	***
***	***
***	***
***	***
Acquisitions:	
***	***
***	***
***	***
Prolonged shutdowns or curtailments:	
***	***
***	***
***	***
***	***
***	***
Revised labor agreements:	
***	***
***	***
***	***
***	***
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Recent developments in U.S. industry

Table III-4 highlights recent developments in the domestic industry. Since 2017, the U.S. industry has experienced consolidation and changes in ownership, as well as new investments in rolling mill facilities serving a variety of end markets. In 2017, the acquisition of a domestic producer (Aleris) by a (Zhongwang USA), an affiliate of foreign producer (China Zhongwang), was suspended after it appeared that it would fail to win approval from the Committee on Foreign Investment in the United States (“CFIUS”). Subsequently, a domestic producer (Novelis) announced that it would attempt to acquire Aleris. In March 2020, the acquisition received antitrust approval from the U.S. Department of Justice on the condition that Aleris’ aluminum automotive body sheet assets be sold to a third party. In addition, two firms (Arconic and JW Aluminum) announced the closure of aluminum rolling mills in late 2019 and 2020.

Table III-4
CAAS: Important industry events, since January 1, 2017

Year	Firm	Event
2017	Gränges Americas Inc.	Investment: Gränges announced that it would invest \$110 million to expand its rolling mill operations in Huntingdon, Tennessee. ¹
	Aleris Corporation	Expansion: Aleris opened a \$400 million sheet production facility in Lewisport, Kentucky. ²
	Aleris Corporation	Acquisition suspended: Aleris Corporation and Zhongwang USA announced that their planned merger was suspended after failing to win approval from the CFIUS. ³
	Novelis	Expansion: Novelis announced that it would invest \$4.5 million in its aluminum rolling operations in Warren, Ohio. ⁴
2018	***	***
	Novelis	Acquisition: On July 26, 2018, Aleris announced that it had entered into a definitive agreement to be acquired by Novelis. The acquisition required approval from the U.S. Department of Justice before it could take effect. ⁵
	Arconic	Sale: Arconic announced on October 1, 2018 that it would sell its aluminum rolling mill in Texarkana, Texas to the American subsidiary of Ta Chen Stainless Pipe Co., Ltd. (“Ta Chen”). ⁶
	Gränges Americas Inc.	Expansion: Gränges announced a \$26 million expansion of its plant in Newport, Arkansas to focus on production of light gauge aluminum foil. ⁷
	Jupiter Aluminum	Acquisition: In December 2018, Jupiter Aluminum announced that it acquired Spanish hot- and cold-rolled aluminum company Grupo Valenciana de Aluminio Baux (“Baux”), based in Spain. Baux was previously one of Europe’s “top tier” aluminum smelting, rolling, and coil manufacturers. ⁸

Table continued on next page.

Table III-4--Continued
CAAS: Important industry events, since January 1, 2017

Year	Firm	Event
2019	Commerce	Imposition of countervailing duty orders: On February 6, Commerce issued countervailing duty orders on CAAS from China. ⁹
	Commerce	Imposition of antidumping orders: On February 8, Commerce issued antidumping orders on CAAS from China. ¹⁰
	Arconic	Investment: In February 2019, Arconic announced that it would invest \$100 million into its aluminum rolling mill operations in Alcoa, Tennessee. The project is projected to be completed in Q4 2020 and create 70 new jobs. ¹¹
	Arconic	Labor agreement: In July 2019, Arconic and the United Steelworkers Union (“USW”) negotiated a three-year contract. The agreement covers USW employees at Arconic’s Davenport, Iowa and Alcoa, Tennessee aluminum rolling mill operations. ¹²
	JW Aluminum	Investment: JW Aluminum announced that it had made or had committed to making \$255 million in investments at its Goose Creek, South Carolina aluminum rolling mill facility. The expansion is expected to be completed in 2020. ¹³
	Texarkana Aluminum	Investment/Opening: Texarkana Aluminum, a Ta Chen subsidiary that acquired Arconic’s former aluminum rolling mill operations in Texarkana, Texas, announced that it had officially opened and expects to be fully operational by May 2020. The site is projected to employ 300 workers and produce 300 million pounds of aluminum coils (including CAAS) annually. ¹⁴
	Arconic	Shutdown: Arconic announced that it would shut down its San Antonio aluminum rolling mill operations in the end of 2019. ¹⁵
2020	JW Aluminum	Shutdown: In January 2020, JW Aluminum announced that it would close its St. Louis, Missouri aluminum rolling mill operations, citing unfair trade practices from China. ¹⁶
	Novelis/Aleris	Acquisition: In early March 2020, Novelis won antitrust approval from the U.S. Department of Justice for its \$2.6 billion acquisition of Aleris. The acquisition is conditional on the basis that Novelis divest all of Aleris’ aluminum autobody sheet manufacturing operations in North America. ¹⁷
	JW Aluminum	Closure: In September 2020, JW Aluminum announced it would be closing its Williamsport Pennsylvania facility, effective January 2021. ¹⁸ This facility focused on the production of foil products for aerospace, building and construction, automotive, transportation, and general distribution. ¹⁹
	JW Aluminum	Production Curtailments: News sources indicate that JW Aluminum’s Goose Creek, South Carolina facility endured several fires between August and December of 2020, leading to operational disruptions and capital expenditures. Sources indicate that 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. ²⁰
	American Industrial Partners	Acquisition: In December 2020, American Industrial Partners (AIP) completed its purchase of the former Aleris rolling mill in Lewisport, Kentucky. The business has been renamed “Commonwealth Rolled Products”. ²¹

¹ *Aluminum Insider*, “Granges Announces \$110 Million Expansion at Tennessee Aluminum Rolling Mill,” September 16, 2017, <https://aluminiuminsider.com/granges-announces-us110-million-expansion-tennessee-aluminium-rolling-mill/>, retrieved January 14, 2020.

² *Aluminum Insider*, “Aleris Opens U.S. \$400 Million Aluminum Auto Body Sheet Production Facility in NW Kentucky, November 17, 2017, <http://aluminiuminsider.com/aleris-opens-us400-mm-aluminium-auto-body-sheet-production-facility-nw-kentucky/>, retrieved January 14, 2020.

³ *Business Insider* (originally posted by *Reuters*), “Aluminum Maker Aleris Says Zhongwang USA Deal is Off,” November 13, 2017, <http://www.businessinsider.com/r-aluminum-maker-aleris-says-zhongwang-usa-deal-is-off-2017-11>, retrieved January 14, 2020.

⁴ Novelis, “News Releases: Novelis Invests \$4.5 million at Warren Facility,” November 28, 2017, <http://investors.novelis.com/news-releases?item=643>, retrieved January 14, 2021..

⁵ Novelis, “Novelis to Acquire Downstream Aluminum Producer Aleris,” July 26, 2018, <http://investors.novelis.com/2018-07-26-Novelis-to-Acquire-Downstream-Aluminum-Producer-Aleris>, retrieved January 14, 2021.

⁶ *Aluminum Insider*, “Arconic Sells Texarkana Aluminum Rolling Mill to Taiwan Firm for US\$300 Million Plus Contingency Cash,” October 3, 2018, <https://aluminiuminsider.com/arconic-sells-texarkana-aluminium-rolling-mill-to-taiwan-firm-for-us300-million-plus-contingency-cash/>, retrieved January 14, 2021.

⁷ Gränges, “Granges to restart production in Newport, Arkansas – investment of USD 26 million,” May 3, 2018, <https://www.granges.com/media/press-releases/2018/granges-to-restart-production-in-newport-arkansas--investment-of-usd-26-million/#:~:text=Back-.Gr%C3%A4nges%20to%20restart%20production%20in%20Newport%2C%20Arkansas,investment%20of%20USD%2026%20million&text=Gr%C3%A4nges%20has%20decided%20to%20restart,amounts%20to%20USD%2026%20million>, retrieved January 14, 2021.

⁸ *Aluminum Insider*, “Jupiter Aluminum Buys Spanish Cold-Rolled Producer Grupo Valenciana de Aluminio Baux,” <https://aluminiuminsider.com/jupiter-aluminum-buys-spanish-cold-rolled-producer-grupo-valenciana-de-aluminio-baux/>, retrieved January 14, 2021 .

⁹ *Common Alloy Aluminum Sheet From the People's Republic of China: Countervailing Duty Order*, 84 FR 2157, February 6, 2019.

¹⁰ *Common Alloy Aluminum Sheet From the People's Republic of China: Antidumping Duty Order*, 84 FR 2813, February 8, 2019.

¹¹ Toto, “Arconic to invest \$100 million in expansion,” *Recycling Today*, <https://www.recyclingtoday.com/article/arconic-upgrades-alcoa-tennessee-plant/>, retrieved January 14, 2021.

¹² Larson, “United Steelworkers, Arconic Agree on 3-Year Master Contract,” *Pittsburgh Business Times*, <https://www.bizjournals.com/pittsburgh/news/2019/07/12/united-steelworkers-arconic-agree-on-3-year-master.html>, retrieved January 14, 2021.

¹³ JW Aluminum, “JW Aluminum Ranks Fourth in Top Economic Development Announcements by Capital Investment in South Carolina,” <http://www.globenewswire.com/news-release/2019/02/11/1716713/0/en/JW-Aluminum-Ranks-Fourth-in-Top-Economic-Development-Announcements-by-Capital-Investment-in-South-Carolina.html>, retrieved January 14, 2021.

¹⁴ Light Metal Age, “Texarkana Aluminum Opens Aluminum Rolling Plant,” October 29, 2019, <https://www.lightmetalage.com/news/industry-news/flat-rolled-sheet/texarkana-aluminum-opens-aluminum-rolling-plant/>, retrieved January 14, 2021.

¹⁵ *Argus Media*, “Arconic to idle Al rolling capacity in Texas,” November 5, 2019, <https://www.argusmedia.com/en/news/2009507-arconic-to-idle-al-rolling-capacity-in-texas>, retrieved January 14, 2021.

¹⁶ Eisele, “JW Aluminum closing St. Louis foil plant in May citing unfair trade practices from China,” January 27, 2020, https://www.kmov.com/news/jw-aluminum-closing-st-louis-foil-plant-in-may-citing/article_b61919c6-4182-11ea-b028-8b60359024ac.html, retrieved January 14, 2021.

¹⁷ Bartz, “Novelis wins antitrust approval to buy Aleris with conditions,” *Reuters*, March 9, 2020, <https://www.reuters.com/article/us-aleris-m-a-novelis/novelis-wins-antitrust-approval-to-buy-aleris-with-conditions-idUSKBN20W2UE>, retrieved January 14, 2021.

¹⁸ JW Aluminum, “JW Aluminum Announces the Closure of its Plant in Williamsport, PA,” September 2, 2020. <http://www.jwaluminum.com/news-1-0-0>, retrieved January 14, 2021.

¹⁹ JW Aluminum, “Locations,” <http://www.jwaluminum.com/locations-0>, retrieved November 20, 2020

²⁰ AMM, “JW Aluminum’s Mt. Holly Expansion Delayed by Fire,” August 31, 2020. <https://www.amm.com/Article/3948931/JW-Aluminums-Mt-Holly-expansion-delayed-by-fire.html>, retrieved March 9, 2021.; 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->

[headlines/jw-aluminum-downgraded-by-s-p-global-ratings-to-ccc-on-weakened-metrics-61859111](#), March 9, 2021.

²¹ American Industrial Partners, "Aleris Lewisport KY Facility is Now Commonwealth Rolled Products", December 1, 2020. <https://americanindustrial.com/aleris-lewisport-ky-aluminum-facility-is-now-commonwealth-rolled-products/>, retrieved January 14, 2021.

Note: Brackets indicate business proprietary information that was obtained from questionnaires for which no public source was found.

Source: Various company websites and news articles.

U.S. production, capacity, and capacity utilization

Table III-5 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. U.S. producers' capacity decreased from *** short tons in 2017 to *** in 2018 before increasing to *** short tons in 2019, a *** short ton (***) percent increase from 2017 to 2019. The increase in capacity reflects the re-opening of a former mill by *** and expansions by *** and *** in 2019. Capacity in interim 2020 was higher than in interim 2019. U.S. producers' production increased by *** percent from 2017 to 2019, though production was 13.3 percent lower in interim 2020 compared to interim 2019. Capacity utilization increased from *** percent in 2017 to *** percent 2018, but then declined to *** percent in 2019, ending *** percentage points lower than in 2017. Capacity utilization was also lower in interim 2020 compared to interim 2019.²

Petitioners contend that U.S. producers' capacity increases reflect specific investments to either hot-rolling capacity or CAAS capacity. They estimate the annual aggregate capacity on equipment used to produce CAAS (including shared capacity with other products) as of January 1, 2021 to be *** short tons. JW Aluminum is completing a two-phase expansion project that includes addition of a new hot mill. *** plans to continue to invest *** through *** that will incrementally increase CAAS capacity. In addition, Texarkana and Commonwealth project that their hot mill capacity will continue to increase – Texarkana with an additional *** short tons through *** and Commonwealth with an additional *** short tons through ***.³

² ***, *** allocated ***.

³ Petitioners' Posthearing Brief, Exhibit 1, pp. 68-73. For additional data on petitioning firms 2021 capacity and production figures, see Petitioners' Posthearing brief, Exhibit 16.

Table III-5

CAAS: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Capacity (short tons)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth (formerly Aleris)	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	1,410,730	1,565,147
	Production (short tons)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth (formerly Aleris)	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	1,052,811	912,364

Table continued on next page.

Table III-5--Continued

CAAS: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Capacity utilization (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth (formerly Aleris)	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	74.6	58.3
	Share of production (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth (formerly Aleris)	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

Note.-- U.S. producer questionnaires asked firms to report production of products using the same equipment, machinery, or employees as used to produce common alloy aluminum sheet, and the combined production capacity on this shared equipment, machinery, or employees in the periods indicated. Capacity was defined as follows: "Overall production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

Source: Compiled from data submitted in response to Commission questionnaires.

Figure III-1
CAAS: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to September 2019, and January to September 2020

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

As shown in table III-6, U.S. producers manufactured the vast majority of final grade CAAS using their own production of F temper re-roll stock – *** percent in 2017, *** percent in 2018, and *** percent in 2019. Production of final grade CAAS using purchased F temper from domestic producers decreased from *** percent in 2017 to *** percent in 2018 before increasing to *** percent in 2019. With respect to this increase, ***.⁴ *** also contributed to the higher proportion of final grade CAAS using purchased F temper from subject sources, which increased from *** percent to *** percent from 2017 to 2019. Conversely, this contributed to a lower share of U.S. production of final grade CAAS using own production of F temper re-roll stock in interim 2020 compared to interim 2019.

⁴ ***.

Table III-6
CAAS: U.S. producers' production by type of final grade, 2017-19, January to September 2019,
and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Production of final grade using: Own F temper	***	***	***	***	***
Production of final grade using purchased F temper from:					
Domestic producers	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
Production of final grade: Without F temper	***	***	***	***	***
All CAAS final grade production	***	***	***	***	***
Total production	***	***	***	1,052,811	912,364
	Share of overall production (percent)				
Final grade using: Own F temper	***	***	***	***	***
Final grade using purchased F temper from:					
Domestic producers	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
Final grade: Without F temper	***	***	***	***	***
All CAAS final grade production	100.0	100.0	100.0	100.0	100.0
Total production	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table III-7, *** percent to *** percent of the product produced during 2017-19 by U.S. producers was CAAS. During this period, overall capacity increased by *** percent, while net production and CAAS production increased by *** percent and *** percent, respectively. Non-common alloy sheet and aluminum can stock, each accounting for approximately *** percent of production between 2017 and 2019, held the second and third largest individual shares of production after CAAS. Overall capacity utilization increased from *** percent in 2017 to *** percent in 2018 before declining to *** percent in 2019. Overall capacity utilization was lower in interim 2020 compared to interim 2019.

Table III-7

CAAS: U.S. producers' overall capacity and production on the same equipment as subject production, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	2,934,077	3,048,827
Production: CAAS	***	***	***	1,052,811	912,364
Can stock	***	***	***	537,203	525,224
Non-common alloy sheet	***	***	***	547,566	489,035
Foil, all alloys	***	***	***	278,692	250,699
Plate, all alloys	***	***	***	113,286	100,974
Other products	***	***	***	---	---
Out-of-scope production	***	***	***	1,476,747	1,365,932
Total production on same machinery	***	***	***	2,529,558	2,278,296
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	86.2	74.7
Share of production: CAAS	***	***	***	41.6	40.0
Can stock	***	***	***	21.2	23.1
Non-common alloy sheet	***	***	***	21.6	21.5
Foil, all alloys	***	***	***	11.0	11.0
Plate, all alloys	***	***	***	4.5	4.4
Other products	***	***	***	---	---
Out-of-scope production	***	***	***	58.4	60.0
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' U.S. shipments and exports

Table III-8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. Two firms, *** and ***, reported internal consumption, accounting for *** percent of U.S. producers' U.S. shipments, by quantity, in 2019. One firm, ***, reported transfers to related firms in 2019, accounting for *** percent of U.S. producers' U.S. shipments, by quantity. Nine of the 11 U.S. producers reported export shipments to Canada and/or Mexico which ranged from *** to *** percent of total U.S. producers' total shipments during 2017-19. U.S. producers' U.S. shipments increased by *** percent from 2017-18 and by *** percent from 2018-19, by quantity, and by *** percent from 2017-18 and by *** percent from 2018-19, by value. Both U.S. shipments and export shipments were lower in interim 2020 compared to interim 2019. Average unit values of U.S. shipments increased from 2017-19 as well, however they were lower in interim 2020 compared to interim 2019.

Table III-8

CAAS: U.S. producers' U.S. shipments, export shipments, and total shipments, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. shipments	***	***	***	1,004,972	907,245
Export shipments	***	***	***	55,878	39,191
Total shipments	***	***	***	1,060,850	946,436
	Value (1,000 dollars)				
U.S. shipments	***	***	***	3,340,900	2,611,926
Export shipments	***	***	***	188,774	116,768
Total shipments	***	***	***	3,529,674	2,728,694
	Unit value (dollars per short ton)				
U.S. shipments	***	***	***	3,324	2,879
Export shipments	***	***	***	3,378	2,979
Total shipments	***	***	***	3,327	2,883
	Share of quantity (percent)				
U.S. shipments	***	***	***	94.7	95.9
Export shipments	***	***	***	5.3	4.1
Total shipments	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. shipments	***	***	***	94.7	95.7
Export shipments	***	***	***	5.3	4.3
Total shipments	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' inventories

Table III-9 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' end-of-period inventories increased during 2017-19, from *** to *** short tons, with one firm, ***, accounting for *** percent of the increase.⁵ U.S. producers' end-of-period inventories were lower in interim 2020 compared to interim 2019. The ratios of inventories to U.S. production, U.S. shipments, and total shipments all increased during 2017-19, and were all higher in interim 2020 compared to interim 2019.

Table III-9

CAAS: U.S. producers' inventories, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. producers' end-of-period inventories	***	***	***	217,788	203,391
	Ratio (percent)				
Ratio of inventories to.--					
U.S. production	***	***	***	15.5	16.7
U.S. shipments	***	***	***	16.3	16.8
Total shipments	***	***	***	15.4	16.1

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' imports and purchases

U.S. producers' imports and purchases of CAAS are presented in tables III-10 and III-12. Imports by companies affiliated with U.S. producers are presented in table III-11. Several current U.S. producers directly import CAAS from subject sources. Arconic's ratio to U.S. production of imports from subject sources was not greater than *** percent in any period. In 2019, Jupiter's, JW Aluminum's, Novelis', and Texarkana's ratios to U.S. production of imports from subject sources were ***, ***, ***, and ***, respectively. For every U.S. producer that reported imports of CAAS from subject sources, 2019 was the year with the *** ratio of subject imports to U.S. production during 2017-19. Three U.S. producers reported purchases of CAAS from other domestic producers and two reported purchases of CAAS from subject sources from 2017 to 2019.

⁵ ***.

As indicated earlier in this report, several U.S. producers are related both to foreign producers and to U.S. importers of CAAS. ***⁶

Novelis Corporation ***.⁷

Texarkana reported ***.⁸ Texarkana's parent company is Ta Chen, the *** U.S. importer of CAAS from *** in these investigations. ***.⁹

⁶ Petitioners' Posthearing Brief, Exhibit 1, p. 34.

⁷ Petitioners' Posthearing Brief, Exhibit 1, p. 36.

⁸ Texarkana questionnaire response, II-13.

⁹ Petitioners' Posthearing Brief, Exhibit 11, pp. 1-3.

Table III-10
CAAS: U.S. producers' imports, 2017-19, January to September 2019, and January to September 2020

* * * * *

Table continued on next page.

Table III-10--Continued
CAAS: U.S. producers' imports, 2017-19, January to September 2019, and January to September 2020

* * * * *

Table continued on next page.

Table III-10--Continued
CAAS: U.S. producers' imports, 2017-19, January to September 2019, and January to September 2020

* * * * *

Table continued on next page.

Table III-10--Continued
CAAS: U.S. producers' imports, 2017-19, January to September 2019, and January to September 2020

* * * * *

Table continued on next page.

Table III-10--Continued
CAAS: U.S. producers' imports, 2017-19, January to September 2019, and January to September 2020

* * * * *

Table continued on next page.

Table III-10--Continued

CAAS: U.S. producers' imports, 2017-19, January to September 2019, and January to September 2020

* * * * *

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires

Table III-11

CAAS: Imports by companies affiliated with U.S. producers, 2017-19, January to September 2019, and January to September 2020

* * * * *

Table continued on next page.

Table III-11--Continued
CAAS: Imports by companies affiliated with U.S. producers, 2017-19, January to September 2019,
and January to September 2020

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-12

CAAS: U.S. producers' purchases, 2017-19, January to September 2019, and January to September 2020

* * * * *

Note.-- ***. **.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. employment, wages, and productivity

Table III-13 shows U.S. producers' employment-related data. Between 2017 and 2019 the number of production and related workers ("PRWs") exhibited a net decline of *** from *** to ***¹⁰, while hours worked by PRW increased by *** hours. Hourly wages for PRWs increased by *** percent from 2017 to 2019, while productivity increased by *** percent, resulting in a decrease in unit labor costs from 2017 to 2019. PRWs, hours worked by PRW, and productivity were all lower in interim 2020 compared to interim 2019, while hourly wages were higher in interim 2020 compared to interim 2019.

Table III-13

CAAS: U.S. producers' employment related data, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	***	***	***	5,148	4,857
Total hours worked (1,000 hours)	***	***	***	8,871	7,909
Hours worked per PRW (hours)	***	***	***	1,723	1,628
Wages paid (\$1,000)	***	***	***	269,535	250,212
Hourly wages (dollars per hour)	***	***	***	\$30.38	\$31.64
Productivity (short tons per 1,000 hours)	***	***	***	118.7	115.4
Unit labor costs (dollars per short ton)	***	***	***	\$256	\$274

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁰ Four of the responding 11 U.S. producers experienced a net decline from 2017 to 2019 – ***.

Part IV: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 413 firms believed to be importers of subject CAAS, as well as to all U.S. producers of CAAS.¹ Usable questionnaire responses were received from 95 companies,² representing the following percentage of imports from individual subject countries in 2019.³

- 95.9 percent of U.S. imports from Bahrain
- 92.6 percent of U.S. imports from Brazil
- 138.4 percent of U.S. imports from Croatia
- 88.3 percent of U.S. imports from Egypt
- 62.1 percent of U.S. imports from Germany
- 92.6 percent of U.S. imports from India
- 103.4 percent of U.S. imports from Indonesia
- 127.1 percent of U.S. subject imports from Italy
- 99.5 percent of U.S. imports from Oman
- 61.2 percent of U.S. imports from Romania

¹ The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data provided by U.S. Customs and Border Protection (“Customs”), may have accounted for more than one percent of total 2019 imports from each of the original subject countries under the HTS statistical reporting numbers identified in the scope.

² There were 111 firms reporting that they did not import CAAS into the United States. The U.S. importer questionnaire data presented in this report are compiled from the data of 88 responses to Commission questionnaires. Due to file size limitations, seven questionnaire responses from U.S. importers *** were not included in the data set; these responses covered very small quantities and values of U.S. imports of final temper CAAS from predominantly nonsubject sources.

³ The response rates presented are calculated based on a comparison of the quantity of 2019 U.S. imports of CAAS as reported in the responses to the Commission’s U.S. importer questionnaires with total quantity of 2019 U.S. official import statistics. Figures from Italy are calculated excluding imports from Laminazione Sottile (for which Commerce has calculated a de minimis dumping margin), as reported in the responses to the Commission’s U.S. importer questionnaires.

- 232.3 percent of U.S. imports from Serbia⁴
- 42.2 percent of U.S. imports from Slovenia
- 105.5 percent of U.S. imports from South Africa
- 74.7 percent of U.S. imports from Spain
- 107.9 percent of U.S. imports from Taiwan
- 77.4 percent of U.S. imports from Turkey
- 92.4 percent of U.S. imports from Subject Sources
- 37.9 percent of U.S. imports from Nonsubject Sources⁵
- 73.4 percent from All Import Sources

Import quantities and values presented in this report are derived from official U.S. import statistics using 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, except as otherwise noted.⁶ Table IV-1 lists all responding U.S. importers of CAAS from subject

⁴ *** reported a higher volume of CAAS imports from Serbia than official import statistics. **. The foreign producer identified, ** also reported a higher volume of CAAS exports to the United States than official import statistics.

⁵ Official imports statistics for U.S. imports from nonsubject sources are believed to include some out-of-scope merchandise from ** imported under the primary HTS statistical reporting numbers. Staff requested information on certain large volume of imports from ** to confirm whether they are in-scope CAAS. The response from ** disclosed out-of-scope merchandise imported under the primary HTS statistical reporting numbers from ** – **. Import quantities and values presented from Canada are derived from official U.S. import statistics **.

⁶ From January 1, 2017 through June 30, 2019, imports of CAAS entered the United States under HTSUS 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 1, 2019, the following changes to the HTSUS were made: (1) statistical reporting number 7606.91.3090 was consolidated with statistical reporting number 7606.91.3075 into current HTSUS statistical reporting number 7606.91.3095; (2) statistical reporting number 7606.91.6080 was consolidated with statistical reporting number 7606.91.6060 into current HTSUS statistical reporting number 7606.91.6095; (3) statistical reporting number 7606.92.3090 was consolidated with statistical reporting number 7606.92.3075 into current HTSUS statistical reporting number 7606.92.3035; and (4) statistical reporting number 7606.92.6080 was consolidated with statistical reporting number 7606.92.6060 into current HTSUS statistical reporting number 7606.92.6095. Given these various changes, the quantity and value of imports for calendar year 2019 include imports under the following HTSUS statistical reporting numbers:

(continued...)

and nonsubject sources, their locations, and their shares of U.S. imports (compiled from data submitted in response to Commission questionnaires), in 2019.

**Table IV-1
CAAS: U.S. importers, their headquarters, and share of total imports by source, 2019**

Firm	Headquarters	Share of imports by source (percent)		
		Subject sources	All other sources	All import sources
AA Metals	Orlando, FL	***	***	***
AKG	Mebane, NC	***	***	***
Alanod Westlake	North Ridgeville, OH	***	***	***
Aleris Germany	Koblenz, Germany,	***	***	***
Aludium	Amorebieta, Vizcaya, Spain	***	***	***
Architectural Systems Group	Chandler, AZ	***	***	***
Arconic	Pittsburgh, PA	***	***	***
ASAS Aluminyum	Istanbul, Turkey	***	***	***
ASO Safety	Rockaway, NJ	***	***	***
Ayres Composite	Theodore, AL	***	***	***
Bayou Metal	Slidell, LA	***	***	***
BFCC	Chester, SC	***	***	***
Burr Oak	Sturgis, MI	***	***	***
Buyers Products	Mentor, OH	***	***	***
Calstrip	Mira Loma, CA	***	***	***
Cascadia Metals	Longview, WA	***	***	***
Central National Group	Purchase, NY	***	***	***
Century Metals	CAROLINA, PR	***	***	***
Champagne Metals	Glenpool, Ok	***	***	***
Chart	Ballground, GA	***	***	***
Chemetal	Easthampton, MA	***	***	***
Cleveland Metal	Pepper Pike, OH	***	***	***
Coast Aluminum	Santa Fe Springs, CA	***	***	***
CommScope	Hickory, NC	***	***	***
Constellium	Ravenswood, WV	***	***	***
CPW America	Houston, TX	***	***	***
Eastman Kodak	Rochester, NY	***	***	***
ElringKlinger	Buford, GA	***	***	***

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(...continued)

7606.11.3060, 7606.11.6000, 7606.12.3090, 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. Effective January 1, 2020, statistical reporting number 7606.12.3090, which covered not clad aluminum alloy sheet and strip with a thickness exceeding 0.2 millimeters and 6.3 millimeters or less (not including aluminum can stock), was sub-divided into two new categories, HTSUS statistical reporting numbers 7606.12.3091 and 7606.12.3096. These statistical reporting numbers cover imports of out-of-scope heat-treatable sheet, and in-scope CAAS, respectively. As a result, CAAS imports under HTSUS statistical reporting number 7606.12.3090 for calendar years 2017-19 are somewhat overstated and contain some volume of out-of-scope heat-treatable sheet.

Table IV-1--Continued

CAAS: U.S. importers, their headquarters, and share of total imports by source, 2019

Firm	Headquarters	Share of imports by source (percent)		
		Subject sources	All other sources	All import sources
Englert	Perth Amboy, NJ	***	***	***
Far East	Carson, CA	***	***	***
FCC Metals	Pompano Beach, FL	***	***	***
Federal-Mogul	Southfield, MI	***	***	***
Florida Aluminum	Miami, FL	***	***	***
Garmco USA	Plano, TX	***	***	***
Granges	Franklin, TN	***	***	***
Grant Morris	Sunset Hills, MO	***	***	***
H&D Steel	N Royalton, OH	***	***	***
Hadco	Bensalem, PA	***	***	***
Hudson	Morristown, NJ	***	***	***
Hulamin	Pietermaritzburg, South Africa	***	***	***
Hydro Germany	Grevenbroich, Germany	***	***	***
Hydro USA	Baltimore, MD	***	***	***
JL Clark	Rockford, IL	***	***	***
Jupiter	Hammond, IN	***	***	***
JW Aluminum	Daniel Island, SC	***	***	***
Kemper	Ponte Vedra, FL	***	***	***
Kloeckner	Roswell, GA	***	***	***
LWB-ISE	Piqua, OH	***	***	***
MAHLE Behr	Troy, MI	***	***	***
Manakin	Manakin-Sabot, VA	***	***	***
Marquis	Plattsburgh, NY	***	***	***
Materials Technology	Morristown, NJ	***	***	***
Medalco	South Hadley, MA	***	***	***
Metal Exchange	Saint Louis, MO	***	***	***
Meyer Aluminium	Sheboygan Falls, WI	***	***	***
Midwest Metals	Louisville, KY	***	***	***
Mitsubishi Chemical Composites	Chesapeake, VA	***	***	***
Modine	Racine, WI	***	***	***
Morin	Bristol, CT	***	***	***
MT Metal	City of Industry, CA	***	***	***

Table continued on next page.

Table IV-1 --Continued

CAAS: U.S. importers, their headquarters, and share of total imports by source, 2019

Firm	Headquarters	Share of imports by source (percent)		
		Subject sources	All other sources	All import sources
Nexgen	Gardena, CA	***	***	***
Novelis USA	Atlanta, GA	***	***	***
Novelis Germany	Goettingen, Germany	***	***	***
Novelis Brazil	Sao Paulo, Brazil	***	***	***
Novelis Korea	Seoul, Korea	***	***	***
Olbert	Mississauga, ON	***	***	***
Olympic	Bedford Heights, OH	***	***	***
OARC	Suhar, Oman	***	***	***
RM Creations	South Plainfield, NJ	***	***	***
Regal Ware	Kewauskum, WI	***	***	***
Rolling Shield	Hialeah Gardens, FL	***	***	***
SAF	Atlanta, GA	***	***	***
Samuel and Sons	Hamilton, ON	***	***	***
Servimetal	Caguas, PR	***	***	***
Sinobec	Pompano Beach, FL	***	***	***
Steel Summit	Singen, Germany	***	***	***
Ta Chen	Long Beach, CA	***	***	***
Tempo Global Resources	Homewood, IL	***	***	***
Tesla	Fremont, TX	***	***	***
Texarkana	Texarkana, TX	***	***	***
Thomas Erie	Girard, PA	***	***	***
Three D Metals	Valley City, OH	***	***	***
Toyota Tsusho	Georgetown, KY	***	***	***
United Aluminum	North Haven, CT	***	***	***
Vail	New York, NY	***	***	***
Vulcan	Gardena, CA	***	***	***
Wellins	Norcross, GA	***	***	***
Wirth-Brand	Montreal, QC	***	***	***
All firms		100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of CAAS from subject sources and all other sources, and table IV-3 presents data for imports of CAAS by U.S. producers and affiliates of U.S. producers from subject and nonsubject sources. U.S. imports of CAAS from subject sources *** from 2017 to 2019, increasing by *** percent on a quantity basis and by *** percent on a value basis. During the same period, U.S. imports of CAAS from nonsubject sources declined by *** percent on a quantity basis and by ***

percent on a value basis. U.S. imports of CAAS from all sources increased by *** percent on a quantity basis and by *** percent on a value basis between 2017 and 2019. Overall U.S. imports of CAAS from all sources were *** percent lower by quantity and *** percent lower by value during January-September (“interim”) 2020 compared to interim 2019, with imports from subject sources *** percent lower by quantity and *** percent lower by value and imports from nonsubject sources *** percent lower by quantity and *** percent lower by value.

Oman, Germany, and Bahrain were the largest sources of subject U.S. imports of CAAS, accounting for *** percent, *** percent, and *** percent of all import sources, respectively, by quantity, in 2019. Serbia and Croatia were the smallest sources of subject imports, accounting for *** percent and *** percent, respectively, of all import sources, by quantity, in 2019. U.S. imports of CAAS from subject sources were *** percent by quantity in 2019, an increase from *** percent in 2017. In interim 2020 they were *** percent compared to *** percent in interim 2019.

The largest nonsubject sources of U.S. imports of CAAS during 2017-19 were China and Canada. Imports of CAAS from China decreased by 57.3 percent by quantity (52.1 percent by value) from 2017 to 2018, and by 70.5 percent by quantity (62.8 percent by value) from 2018 to 2019, as investigations on CAAS from China were instituted in late 2017 and completed in early 2019. As detailed earlier in Part I, CAAS imports from China are currently subject to antidumping and countervailing duty orders, issued by Commerce in February 2019.⁷

Average unit values of U.S. imports of CAAS from subject sources increased by *** percent from 2017 to 2019, from *** per short ton to *** per short ton. Average unit values of U.S. imports from nonsubject sources increased by *** percent from 2017 to 2019, from *** per short ton to *** per short ton. Overall, the increase in average unit values from all import sources was *** percent from 2017 to 2019. Average unit values of U.S. imports of CAAS from both subject and nonsubject sources was lower in interim 2020 compared to interim 2019.

U.S. imports of CAAS as a ratio to U.S. production increased by *** percentage points for subject sources and decreased by *** percentage points for nonsubject sources from 2017 to 2019. Overall, the ratio of total U.S. imports of CAAS to U.S. production decreased by *** percentage points from 2017 to 2019 and were *** percentage points lower in interim 2020 compared to interim 2019.

⁷ 84 FR 2157, February 8, 2019; 84 FR 2813, February 8, 2019.

Table IV-2
CAAS: U.S. imports, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. imports from.--					
Bahrain	65,162	64,944	76,865	63,058	19,361
Brazil	24,533	28,094	36,466	28,504	9,748
Croatia	---	2,816	9,183	7,756	3,083
Egypt	19	12,636	15,817	15,200	1,784
Germany	32,998	44,690	88,932	70,360	34,687
India	45,855	46,144	50,904	42,422	17,266
Indonesia	72,170	83,701	58,726	56,537	6,403
Italy, subject	***	***	***	***	***
Oman	27,798	69,663	91,204	73,597	50,840
Romania	1,457	4,807	11,087	9,180	3,523
Serbia	---	74	3,806	1,892	967
Slovenia	---	10,805	12,378	11,175	4,874
South Africa	33,947	48,875	45,611	35,464	12,513
Spain	1,683	5,549	20,667	17,740	12,788
Taiwan	581	35,717	57,196	48,666	19,493
Turkey	6,676	24,704	51,565	41,636	27,570
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	390,874	166,735	49,261	37,489	37,091
Greece	14,202	24,000	32,245	28,440	10,110
Italy, nonsubject	***	***	***	***	***
Korea	12,003	21,637	42,312	35,527	9,918
All other sources	95,259	126,915	128,075	102,423	66,192
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-2--Continued

CAAS: U.S. imports, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Value (1,000 dollars)				
U.S. imports from.--					
Bahrain	172,117	213,650	265,680	220,530	61,177
Brazil	60,409	88,429	110,282	88,271	26,102
Croatia	---	9,918	29,260	25,187	7,872
Egypt	49	40,227	49,587	47,853	3,769
Germany	118,500	184,295	326,141	258,502	126,396
India	105,093	128,919	140,336	117,606	43,491
Indonesia	167,315	231,241	158,405	152,391	16,872
Italy, subject	***	***	***	***	***
Oman	65,731	188,524	229,562	186,841	118,986
Romania	4,652	17,110	34,499	28,737	10,267
Serbia	---	268	11,421	6,085	2,688
Slovenia	---	37,063	41,438	37,770	12,604
South Africa	96,566	158,933	130,927	103,192	35,777
Spain	6,118	21,017	66,863	58,308	36,637
Taiwan	2,765	103,748	163,551	138,488	51,628
Turkey	18,278	77,872	142,867	117,038	71,134
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	972,686	466,231	173,231	127,066	126,553
Greece	43,402	86,858	117,479	103,384	33,825
Italy, nonsubject	***	***	***	***	***
Korea	30,623	69,288	142,441	120,394	30,014
All other sources	344,976	524,639	501,333	399,257	251,695
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-2--Continued

CAAS: U.S. imports, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit value (dollars per short ton)				
U.S. imports from.--					
Bahrain	2,641	3,290	3,456	3,497	3,160
Brazil	2,462	3,148	3,024	3,097	2,678
Croatia	---	3,522	3,186	3,247	2,553
Egypt	2,594	3,184	3,135	3,148	2,112
Germany	3,591	4,124	3,667	3,674	3,644
India	2,292	2,794	2,757	2,772	2,519
Indonesia	2,318	2,763	2,697	2,695	2,635
Italy, subject	***	***	***	***	***
Oman	2,365	2,706	2,517	2,539	2,340
Romania	3,194	3,559	3,112	3,130	2,914
Serbia	---	3,611	3,001	3,216	2,779
Slovenia	---	3,430	3,348	3,380	2,586
South Africa	2,845	3,252	2,871	2,910	2,859
Spain	3,635	3,788	3,235	3,287	2,865
Taiwan	4,759	2,905	2,859	2,846	2,649
Turkey	2,738	3,152	2,771	2,811	2,580
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	2,488	2,796	3,517	3,389	3,412
Greece	3,056	3,619	3,643	3,635	3,346
Italy, nonsubject	***	***	***	***	***
Korea	2,551	3,202	3,366	3,389	3,026
All other sources	3,621	4,134	3,914	3,898	3,803
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-2--Continued

CAAS: U.S. imports, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of quantity (percent)				
U.S. imports from.--					
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
Italy, nonsubject	***	***	***	***	***
Korea	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2--Continued

CAAS: U.S. imports, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of value (percent)				
U.S. imports from.--					
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
Italy, nonsubject	***	***	***	***	***
Korea	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2--Continued

CAAS: U.S. imports, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio to U.S. production				
U.S. imports from.--					
Bahrain	***	***	***	6.0	2.1
Brazil	***	***	***	2.7	1.1
Croatia	***	***	***	0.7	0.3
Egypt	***	***	***	1.4	0.2
Germany	***	***	***	6.7	3.8
India	***	***	***	4.0	1.9
Indonesia	***	***	***	5.4	0.7
Italy, subject	***	***	***	2.0	0.9
Oman	***	***	***	***	***
Romania	***	***	***	0.9	0.4
Serbia	***	***	***	0.2	0.1
Slovenia	***	***	***	1.1	0.5
South Africa	***	***	***	3.4	1.4
Spain	***	***	***	1.7	1.4
Taiwan	***	***	***	4.6	2.1
Turkey	***	***	***	4.0	3.0
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	3.6	4.1
Greece	***	***	***	2.7	1.1
Italy, nonsubject	***	***	***	***	***
Korea	***	***	***	3.4	1.1
All other sources	***	***	***	9.7	7.3
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Note.-- Investigations on CAAS from China were instituted in December 2017 and antidumping and countervailing duty orders were issued by Commerce in February 2019.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Figure IV-1

CAAS: U.S. import quantities and average unit values, 2017-19, January to September 2019, and January to September 2020

* * * * *

Source: Compiled data submitted in response to Commission questionnaires and from official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Table IV-3

CAAS: U.S. imports by U.S. producers and firms affiliated with U.S. producers, by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Direct imports by U.S. producers from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Imports by companies affiliated with U.S. producers from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Direct producer and affiliated company imports from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Share of imports within source (percent)				
Direct imports by U.S. producers from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Imports by companies affiliated with U.S. producers from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Direct producer and affiliated company imports from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Share of total U.S. imports (percent)				
Direct imports by U.S. producers from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Imports by companies affiliated with U.S. producers from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Direct producer and affiliated company imports from.-- Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note.—U.S. producers include ***. Companies affiliated with U.S. producers include ***.

Source: Compiled data submitted in response to Commission questionnaires and from official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Critical circumstances

On March 8, 2021, Commerce issued a final determination that “critical circumstances” exist with respect to imports of aluminum sheet from Turkey for Assan Aluminyum Sanayi ve Ticaret A.S. (“Assan”), but do not exist with respect to Teknik Aluminyum Sanayi A.S. (“Teknik”) or for all other exporters or producers not individually examined.⁸ On March 8, 2021, Commerce issued a final determination that “critical circumstances” exist with respect to imports of aluminum sheet from Indonesia.⁹ If both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from August 14, 2020 for Turkey, the effective date of Commerce’s preliminary affirmative countervailing duty determination and October 15, 2020 for Indonesia, the effective date of Commerce’s preliminary affirmative LTFV determination. Commerce also issued final negative critical circumstances determinations for India,¹⁰ Oman,¹¹ Taiwan,¹² and Turkey.¹³ Tables IV-4 and IV-5 and figure IV-2 present data on U.S. imports and end-of-period U.S. inventories subject to Commerce’s final antidumping critical circumstances determination for U.S. imports of aluminum sheet from Indonesia. Tables IV-6, IV-7, and figure IV-3 present data on U.S. imports and end-of-period U.S. inventories subject to Commerce’s final countervailing duty critical circumstances determination for certain U.S. imports of aluminum sheet from Turkey.

⁸ 86 FR 13315, March 8, 2021, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

⁹ 86 FR 13304, March 8, 2021, referenced in app. A.

¹⁰ 86 FR 13285, March 8, 2021.

¹¹ 86 FR 13328, March 8, 2021.

¹² 86 FR 13293, March 8, 2021.

¹³ 86 FR 13326, March 8, 2021. Commerce issued a final affirmative determination of critical circumstances in part in the countervailing duty investigation of Turkey and a final negative determination of critical circumstances in the antidumping investigation of Turkey.

Table IV-4

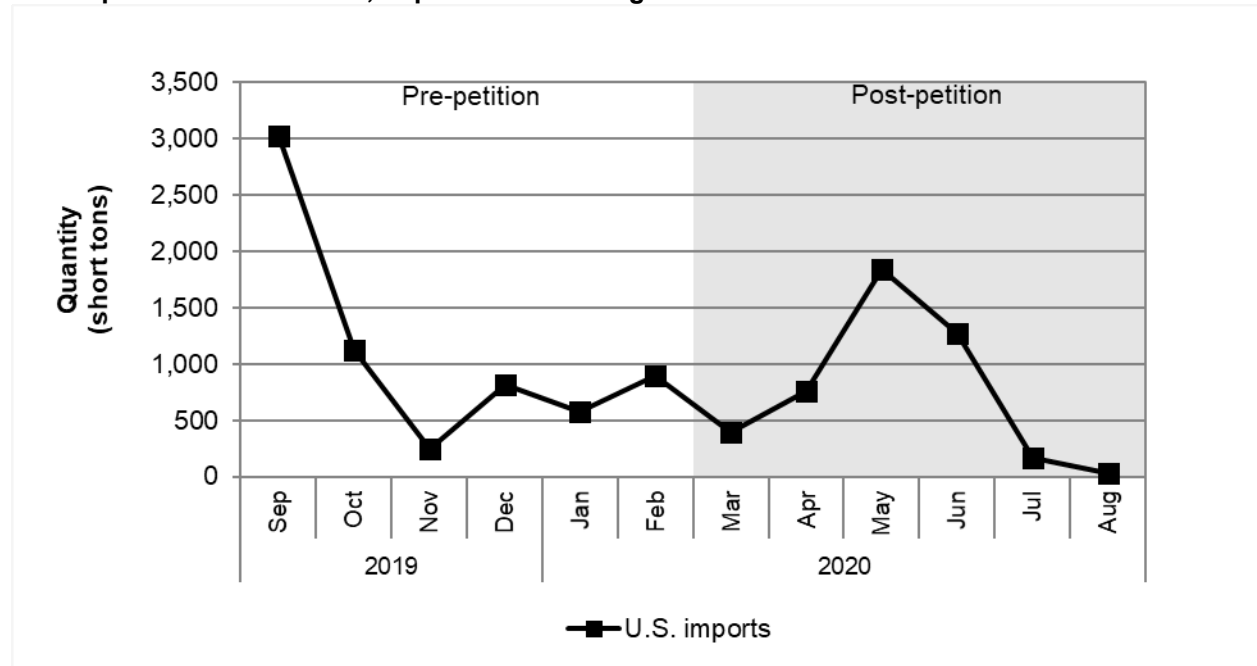
CAAS: U.S. imports subject to Commerce’s final AD critical circumstances determinations for U.S. imports from Indonesia, September 2019 to August 2020

Month	Actual monthly quantity (short tons)	Outwardly cumulative subtotals (short tons)	Percentage change from comparable period (percent)
2019.--			
September	3,028	6,693	
October	1,122	3,666	
November	248	2,544	
December	820	2,297	
2020.--			
January	578	1,477	
February	899	899	
Petition file date: March 9, 2020			
March	394	394	▼(56.2)
April	755	1,149	▼(22.2)
May	1,841	2,990	▲30.2
June	1,270	4,260	▲67.4
July	165	4,425	▲20.7
August	29	4,454	▼(33.5)

Source: Compiled from official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Figure IV-2

CAAS: U.S. imports subject to Commerce’s final AD critical circumstances determinations for U.S. imports from Indonesia, September 2019 August 2020



Source: Compiled from official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Table IV-5

CAAS: End-of-period U.S. inventories subject to Commerce’s final AD critical circumstances determinations for U.S. imports from Indonesia, January 2020 to September 2020

End of period	Inventories (short tons)	Change from previous month (percent)
2020-- January	***	***
February	***	▼***
March	***	▼***
April	***	▲***
May	***	▼***
June	***	▼***
July	***	▼***
August	***	▼***
September	***	▲***

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-6

CAAS: U.S. imports subject to Commerce’s final CVD critical circumstances determinations for certain U.S. imports from Turkey, September 2019 to August 2020

Month	Actual monthly quantity (short tons)	Outwardly cumulative subtotals (short tons)	Percentage change from comparable period (percent)
2019.--			
September	***	***	
October	***	***	
November	***	***	
December	***	***	
2020.--			
January	***	***	
February	***	***	
Petition file date: March 9, 2020			
March	***	***	▲ ***
April	***	***	▲ ***
May	***	***	▼ ***
June	***	***	▼ ***
July	***	***	▼ ***
August	***	***	▼ ***

Note.--Commerce's final CVD critical circumstances determination are for imports from Turkey from foreign producer Assan Aluminyum Sanayi ve Ticaret A.S. (Assan) only.

Source: Compiled from data submitted in response to Commission questionnaires.

Figure IV-3

CAAS: U.S. imports subject to Commerce’s final CVD critical circumstances determinations for certain U.S. imports from Turkey, September 2019 to August 2020

* * * * *

Note.--Commerce's final CVD critical circumstances determination are for imports from Turkey from foreign producer Assan Aluminyum Sanayi ve Ticaret A.S. (Assan) only.

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-7

CAAS: End-of-period U.S. inventories subject to Commerce’s final CVD critical circumstances determinations for U.S. imports from Turkey, December 2018 to November 2019

End of period	Inventories (short tons)	Change from previous month (percent)
2020.-- January	***	***
February	***	▼***
March	***	▼***
April	***	▼***
May	***	▼***
June	***	▼***
July	***	▼***
August	***	▼***
September	***	▼***

Note.--Commerce's final CVD critical circumstances determination are for imports from Turkey from foreign producer Assan Aluminyum Sanayi ve Ticaret A.S. (Assan) only.

Source: Compiled from data submitted in response to Commission questionnaires.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.¹⁴ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.¹⁵

From March 2019 to February 2020, the most recent 12-month period preceding the filing of the petitions in these investigations, subject imports from Bahrain, Brazil, Germany, India (AD and CVD), Indonesia, Oman, South Africa, Taiwan, and Turkey (AD and CVD) individually accounted for more than three percent of total U.S. imports of CAAS. While subject imports from Croatia, Egypt, Italy, Romania, Serbia, Slovenia, and Spain individually accounted for less than 3 percent of the total volume, collectively they accounted for *** percent of the share by quantity of individually negligible AD sources of total U.S. imports of CAAS during March 2019 to February 2020. Table IV-8 presents the individual shares by quantity of total imports accounted for by subject countries by quantity during March 2019 to February 2020 based on official U.S. import statistics and data submitted in response to Commission questionnaires.

¹⁴ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

¹⁵ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table IV-8

CAAS: U.S. imports in the twelve-month period preceding the filing of the petition, March 2019 to February 2020

Item	March 2019 to February 2020		
	Quantity (short tons)	Share quantity (percent)	Share quantity of individually negligible AD sources (percent)
U.S. imports from.--			
Bahrain	76,277	***	***
Brazil	32,386	***	***
Croatia	8,739	***	***
Egypt	11,610	***	***
Germany	88,070	***	***
India AD	***	***	***
India CVD	46,826	***	***
Indonesia	45,511	***	***
Italy, subject	***	***	***
Oman	83,499	***	***
Romania	10,855	***	***
Serbia	4,375	***	***
Slovenia	10,116	***	***
South Africa	40,323	***	***
Spain	21,517	***	***
Taiwan	50,768	***	***
Turkey AD	44,982	***	***
Turkey CVD	***	***	***
Subject sources	***	***	***
Canada	***	***	
Greece	28,822	***	
Korea	38,651	***	
Italy, nonsubject	***	***	
All others sources	***	***	
Nonsubject sources	***	***	
All import sources	***	100.0	

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

The Commission requested information concerning U.S. producers' and U.S. importers' U.S. shipments of CAAS, by product type, for calendar year 2019. These data are presented in table IV-9 and figure IV-4.

The vast majority of U.S. shipments of CAAS reported by U.S. producers and importers were either non-clad 5XXX and 3XXX series with *** percent and *** percent of the total, respectively. For U.S. producers, reported U.S. shipments were *** percent non-clad 5XXX series and *** percent non-clad 3XXX series. Reported U.S. shipments of U.S. imports from subject sources were *** percent non-clad 5XXX series and *** percent non-clad 3XXX series. The largest share of U.S. shipments of U.S. imports of CAAS from nonsubject sources were non-clad 5XXX series with *** percent, followed by non-clad 3XXX series with *** percent, non-clad 1XXX series with *** percent, and clad or multi-alloy with *** percent.

All 16 subject import sources included U.S. shipments of non-clad 3XXX series and non-clad 5XXX series, whereas three (***) did not supply non-clad 1XXX series, and six (***) supplied clad or multi-alloy, or other products.

U.S. producers' reported U.S. shipments of CAAS accounted for the following shares of total U.S. shipments of CAAS - *** percent of non-clad 5XXX series, *** percent of non-clad 3XXX series, *** percent of non-clad 1XXX series, *** percent of clad or multi-alloy, and *** percent of other products.

Table IV-9
CAAS: U.S. producers' and U.S. importers' U.S. shipments by alloy type, 2019

Item	U.S. shipments					
	Non-clad			Clad or multi-alloy	Other products	Total
	1XXX	3XXX	5XXX			
	Quantity (short tons)					
U.S. producers	***	***	***	***	***	***
U.S. shipments of imports from:						
Bahrain	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Croatia	***	***	***	***	***	***
Egypt	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***
Italy, subject	***	***	***	***	***	***
Oman	***	***	***	***	***	***
Romania	***	***	***	***	***	***
Serbia	***	***	***	***	***	***
Slovenia	***	***	***	***	***	***
South Africa	***	***	***	***	***	***
Spain	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Canada	***	***	***	***	***	***
Greece	***	***	***	***	***	***
Italy, subject	***	***	***	***	***	***
Korea	***	***	***	***	***	***
All other sources, including China	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
U.S. producers and U.S. importers	99,210	873,469	929,974	100,015	3,249	2,005,917

Table continued on next page.

Table IV-9--Continued
CAAS: U.S. producers' and U.S. importers' U.S. shipments by alloy type, 2019

Item	U.S. shipments					
	Non-clad			Clad or multi-alloy	Other products	Total
	1XXX	3XXX	5XXX			
	Share down (percent)					
U.S. producers	***	***	***	***	***	***
U.S. shipments of imports from:						
Bahrain	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Croatia	***	***	***	***	***	***
Egypt	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***
Italy, subject	***	***	***	***	***	***
Oman	***	***	***	***	***	***
Romania	***	***	***	***	***	***
Serbia	***	***	***	***	***	***
Slovenia	***	***	***	***	***	***
South Africa	***	***	***	***	***	***
Spain	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Canada	***	***	***	***	***	***
Greece	***	***	***	***	***	***
Italy, subject	***	***	***	***	***	***
Korea	***	***	***	***	***	***
All other sources, including China	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
U.S. producers and U.S. importers	100.0	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-9--Continued
CAAS: U.S. producers' and U.S. importers' U.S. shipments by alloy type, 2019

Item	U.S. shipments					
	Non-clad			Clad or multi-alloy	Other products	Total
	1XXX	3XXX	5XXX			
	Share across (percent)					
U.S. producers	***	***	***	***	***	100.0
U.S. shipments of imports from:						
Bahrain	***	***	***	***	***	100.0
Brazil	***	***	***	***	***	100.0
Croatia	***	***	***	***	***	100.0
Egypt	***	***	***	***	***	100.0
Germany	***	***	***	***	***	100.0
India	***	***	***	***	***	100.0
Indonesia	***	***	***	***	***	100.0
Italy, subject	***	***	***	***	***	100.0
Oman	***	***	***	***	***	100.0
Romania	***	***	***	***	***	100.0
Serbia	***	***	***	***	***	100.0
Slovenia	***	***	***	***	***	100.0
South Africa	***	***	***	***	***	100.0
Spain	***	***	***	***	***	100.0
Taiwan	***	***	***	***	***	100.0
Turkey	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	100.0
Canada	***	***	***	***	***	100.0
Greece	***	***	***	***	***	100.0
Italy, subject	***	***	***	***	***	100.0
Korea	***	***	***	***	***	100.0
All other sources, including China	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	100.0
All import sources	***	***	***	***	***	100.0
U.S. producers and U.S. importers	4.9	43.5	46.4	5.0	0.2	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Figure IV-4
CAAS: U.S. producers' and U.S. importers' U.S. shipments by alloy type, 2019

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

The Commission also requested information concerning U.S. producers' and U.S. importers' U.S. shipments of CAAS, by temper type. These data for calendar year 2019 are presented in table IV-10 and figure IV-5.

U.S. producers' reported 2019 commercial U.S. shipments of CAAS were *** percent final temper and *** percent F temper re-roll stock. U.S. producers' reported commercial U.S. shipments of CAAS accounted for the majority of total U.S. shipments of CAAS - *** percent of F temper re-roll stock and *** percent of final temper CAAS.

Reported 2019 U.S. shipments of imports of CAAS from subject sources were *** percent final temper, and imports of CAAS from nonsubject sources was *** percent final temper. Final temper CAAS accounted for all 2019 U.S. shipments of imports of CAAS from 10 of the 16 subject countries, and *** percent or more of 2019 U.S. shipments of imports of CAAS from four other subject countries. F temper re-roll stock CAAS accounted for *** percent and *** percent of 2019 U.S. shipments of imports of CAAS from *** and ***, respectively.

Table IV-10
CAAS: U.S. producers' and U.S. importers' U.S. shipments by temper, 2019

Item	U.S. shipments		
	F temper, re-roll stock	Final temper	All temper types
	Quantity (short tons)		
U.S. producers	***	***	***
U.S. shipments of imports from:			
Bahrain	***	***	***
Brazil	***	***	***
Croatia	***	***	***
Egypt	***	***	***
Germany	***	***	***
India	***	***	***
Indonesia	***	***	***
Italy, subject	***	***	***
Oman	***	***	***
Romania	***	***	***
Serbia	***	***	***
Slovenia	***	***	***
South Africa	***	***	***
Spain	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Canada	***	***	***
Greece	***	***	***
Italy, nonsubject	***	***	***
Korea	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
U.S. producers and U.S. importers	***	***	***

Table continued on next page.

Table IV-10--Continued
CAAS: U.S. producers' and U.S. importers' U.S. shipments by temper, 2019

Item	U.S. shipments		
	F temper, re-roll stock	Final temper	All temper types
	Share down (percent)		
U.S. producers	***	***	***
U.S. shipments of imports from:			
Bahrain	***	***	***
Brazil	***	***	***
Croatia	***	***	***
Egypt	***	***	***
Germany	***	***	***
India	***	***	***
Indonesia	***	***	***
Italy, subject	***	***	***
Oman	***	***	***
Romania	***	***	***
Serbia	***	***	***
Slovenia	***	***	***
South Africa	***	***	***
Spain	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Canada	***	***	***
Greece	***	***	***
Italy, nonsubject	***	***	***
Korea	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
U.S. producers and U.S. importers	100.0	100.0	100.0

Table continued on next page.

Table IV-10--Continued
CAAS: U.S. producers' and U.S. importers' U.S. shipments by temper, 2019

Item	U.S. shipments		
	F temper, re-roll stock	Final temper	All temper types
	Share across (percent)		
U.S. producers	***	***	100.0
U.S. shipments of imports from:			
Bahrain	***	***	100.0
Brazil	***	***	100.0
Croatia	***	***	100.0
Egypt	***	***	100.0
Germany	***	***	100.0
India	***	***	100.0
Indonesia	***	***	100.0
Italy, subject	***	***	100.0
Oman	***	***	100.0
Romania	***	***	100.0
Serbia	***	***	100.0
Slovenia	***	***	100.0
South Africa	***	***	100.0
Spain	***	***	100.0
Taiwan	***	***	100.0
Turkey	***	***	100.0
Subject sources	***	***	100.0
Canada	***	***	100.0
Greece	***	***	100.0
Italy, nonsubject	***	***	100.0
Korea	***	***	100.0
All other sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
U.S. producers and U.S. importers	***	***	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Figure IV-5
CAAS: U.S. producers' and U.S. importers' U.S. shipments by temper, 2019

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Geographical markets

CAAS produced in the United States is shipped nationwide.¹⁶ In 2019, official import statistics show that 60.4 percent of subject imports entered through the Eastern border of entry of the United States, followed by the Southern, Western, and Northern borders of entry with 16.3, 15.7, and 7.5 percent, respectively. Imports from each subject source entered each U.S region in 2019, with the exception of Bahrain, where subject imports did not enter the United States through the Northern border of entry in 2019. In 2019, four subject sources (Croatia, Romania, Serbia, South Africa) and two subject sources (Croatia, Serbia) supplied the United States with less than 500 short tons of CAAS individually through the Northern and Western borders of entry, respectively. Table IV-11 presents U.S. import quantities of CAAS sources and border of entry during 2019.

¹⁶ See Part II for additional information on geographic markets.

Table IV-11
CAAS: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Quantity (short tons)				
U.S. imports from.--					
Bahrain	48,139	---	18,559	10,167	76,865
Brazil	26,666	2,179	6,010	1,611	36,466
Croatia	7,862	339	786	196	9,183
Egypt	10,036	1,260	2,011	2,511	15,817
Germany	64,569	10,873	6,305	7,184	88,932
India	30,882	6,597	5,161	8,264	50,904
Indonesia	22,783	2,265	7,283	26,395	58,726
Italy	16,955	6,148	3,861	1,642	28,607
Oman	67,890	8,071	12,130	3,113	91,204
Romania	8,562	211	1,482	832	11,087
Serbia	2,371	104	1,022	309	3,806
Slovenia	7,499	927	2,910	1,042	12,378
South Africa	23,092	13	12,658	9,848	45,611
Spain	11,782	3,909	2,062	2,914	20,667
Taiwan	22,209	1,062	7,168	26,757	57,196
Turkey	26,843	5,692	18,232	798	51,565
Subject sources	398,140	49,651	107,639	103,584	659,014
Nonsubject sources	195,990	111,087	29,168	53,925	390,170
All import sources	594,130	160,738	136,808	157,509	1,049,184

Table continued on next page.

Table IV-11--Continued
CAAS: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Share across (percent)				
U.S. imports from.--					
Bahrain	62.6	---	24.1	13.2	100.0
Brazil	73.1	6.0	16.5	4.4	100.0
Croatia	85.6	3.7	8.6	2.1	100.0
Egypt	63.4	8.0	12.7	15.9	100.0
Germany	72.6	12.2	7.1	8.1	100.0
India	60.7	13.0	10.1	16.2	100.0
Indonesia	38.8	3.9	12.4	44.9	100.0
Italy	59.3	21.5	13.5	5.7	100.0
Oman	74.4	8.8	13.3	3.4	100.0
Romania	77.2	1.9	13.4	7.5	100.0
Serbia	62.3	2.7	26.8	8.1	100.0
Slovenia	60.6	7.5	23.5	8.4	100.0
South Africa	50.6	0.0	27.8	21.6	100.0
Spain	57.0	18.9	10.0	14.1	100.0
Taiwan	38.8	1.9	12.5	46.8	100.0
Turkey	52.1	11.0	35.4	1.5	100.0
Subject sources	60.4	7.5	16.3	15.7	100.0
Nonsubject sources	50.2	28.5	7.5	13.8	100.0
All import sources	56.6	15.3	13.0	15.0	100.0

Table continued on next page.

Table IV-11--Continued
CAAS: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Share down (percent)				
U.S. imports from.--					
Bahrain	8.1	---	13.6	6.5	7.3
Brazil	4.5	1.4	4.4	1.0	3.5
Croatia	1.3	0.2	0.6	0.1	0.9
Egypt	1.7	0.8	1.5	1.6	1.5
Germany	10.9	6.8	4.6	4.6	8.5
India	5.2	4.1	3.8	5.2	4.9
Indonesia	3.8	1.4	5.3	16.8	5.6
Italy	2.9	3.8	2.8	1.0	2.7
Oman	11.4	5.0	8.9	2.0	8.7
Romania	1.4	0.1	1.1	0.5	1.1
Serbia	0.4	0.1	0.7	0.2	0.4
Slovenia	1.3	0.6	2.1	0.7	1.2
South Africa	3.9	0.0	9.3	6.3	4.3
Spain	2.0	2.4	1.5	1.8	2.0
Taiwan	3.7	0.7	5.2	17.0	5.5
Turkey	4.5	3.5	13.3	0.5	4.9
Subject sources	67.0	30.9	78.7	65.8	62.8
Nonsubject sources	33.0	69.1	21.3	34.2	37.2
All import sources	100.0	100.0	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

The "East" border of entry includes the following Customs entry districts for fabricated structural steel: Baltimore, MD; Boston, MA; Buffalo, NY; Charleston, SC; Charlotte, NC; New York, NY; Norfolk, VA; Ogdensburg, NY; Philadelphia, PA; Portland, ME; Providence, RI; San Juan, PR; Savannah, GA; St. Albans, VT; Virgin Islands; and Washington, DC. The "North" border of entry includes the following Customs entry districts for fabricated structural steel: Chicago, IL; Cleveland, OH; Detroit, MI; Duluth, MN; Great Falls, MT; Milwaukee, WI; Minneapolis, MN; Pembina, ND; and St. Louis, MO. The "South" border of entry includes the following Customs entry districts for fabricated structural steel: Dallas-Fort Worth, TX; El Paso, TX; Houston-Galveston, TX; Laredo, TX; Miami, FL; Mobile, AL; New Orleans, LA; Port Arthur, TX; and Tampa, FL. The "West" border of entry includes the following Customs entry districts for fabricated structural steel: Anchorage, AK; Columbia-Snake, OR; Honolulu, HI; Los Angeles, CA; Nogales, AZ; San Diego, CA; San Francisco, CA; and Seattle, WA.

Source: Compiled from official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Presence in the market

Table IV-12 and figure IV-6 present monthly official U.S. import statistics for subject countries and nonsubject sources. The monthly import statistics indicate that U.S. imports of CAAS from each subject country were present in each month during January 2017 to December 2020, with the exceptions of Bahrain (46 of 48 months), Croatia (28 of 48 months), Egypt (29 of 48 months), Serbia (17 of 48 months), and Slovenia (33 of 48 months). With respect to subject imports, only imports from Serbia entered the United States in less than half the months during January 2017 to December 2020, and only imports from Serbia did not enter the United States in every month of 2019.

Table IV-12
CAAS: U.S. imports by month, January 2017 through December 2020

Year and month	Bahrain	Brazil	Croatia	Egypt	Germany	India
	Quantity (short tons)					
2017.--						
January	4,566	1,615	---	---	2,921	3,328
February	3,728	1,063	---	---	3,444	3,203
March	6,290	1,514	---	---	4,015	4,382
April	3,759	2,190	---	---	2,936	4,363
May	7,427	1,227	---	---	2,224	5,638
June	2,902	1,398	---	---	1,995	4,903
July	5,618	1,725	---	---	2,679	4,134
August	6,191	2,262	---	---	2,712	3,963
September	4,756	2,330	---	---	2,584	1,557
October	7,608	2,271	---	19	1,965	3,657
November	8,455	5,185	---	---	2,906	2,000
December	3,863	1,752	---	---	2,616	4,727
2018.--						
January	4,959	1,522	---	---	2,508	2,961
February	4,462	2,797	---	---	1,893	3,391
March	5,312	1,867	4	235	1,834	4,642
April	8,406	1,720	---	804	2,349	3,196
May	8,417	1,709	---	1,660	4,110	4,349
June	3,860	480	---	1,188	2,411	3,583
July	5,335	2,999	387	1,052	3,042	4,411
August	4,140	2,428	434	1,056	4,448	4,531
September	4,340	2,857	318	1,703	4,961	3,439
October	6,440	3,840	333	2,088	5,046	3,508
November	4,513	3,734	526	975	6,593	3,513
December	4,758	2,141	815	1,875	5,496	4,619

Table continued on next page.

Table IV-12--Continued
CAAS: U.S. imports by month, January 2017 through December 2020

Year and month	Bahrain	Brazil	Croatia	Egypt	Germany	India
	Quantity (short tons)					
2019.--						
January	5,170	4,114	557	2,638	5,676	4,928
February	3,747	4,000	285	1,590	5,218	4,320
March	6,865	3,845	1,226	2,695	8,313	6,522
April	6,827	3,680	885	2,183	8,984	4,077
May	10,077	3,541	981	3,445	8,903	5,834
June	5,671	3,219	870	767	10,095	5,119
July	7,862	1,851	1,399	1,492	8,557	4,305
August	7,656	1,642	533	321	9,226	4,237
September	9,184	2,611	1,020	69	5,387	3,081
October	5,956	2,331	341	371	6,357	3,501
November	5,161	2,404	404	195	5,046	2,601
December	2,689	3,227	682	51	7,169	2,379
2020.--						
January	5,690	2,325	148	20	4,461	2,719
February	2,640	1,710	251	---	5,571	2,452
March	3,130	1,122	272	---	5,337	2,242
April	4,502	1,143	180	67	4,146	2,952
May	2,242	1,618	44	---	2,338	3,584
June	1,080	643	326	---	3,271	1,985
July	10	23	304	13	2,146	658
August	62	1,059	449	1,350	3,814	491
September	6	106	1,110	334	3,602	182
October	---	184	---	225	4,381	59
November	45	2	---	---	3,087	96
December	---	0	---	---	2,457	93

Table continued on next page.

Table IV-12--Continued
CAAS: U.S. imports by month, January 2017 through December 2020

Year and month	Indonesia	Italy	Oman	Romania	Serbia	Slovenia
	Quantity (short tons)					
2017.--						
January	5,794	257	1,972	63	---	---
February	4,242	81	1,387	47	---	---
March	5,621	226	2,278	209	---	---
April	6,264	269	1,910	191	---	---
May	7,661	267	1,303	111	---	---
June	6,086	334	1,702	96	---	---
July	5,769	187	2,673	85	---	---
August	4,680	376	2,441	281	---	---
September	6,273	172	1,910	80	---	---
October	6,617	180	3,133	189	---	---
November	7,228	294	3,403	13	---	---
December	5,935	440	3,686	92	---	---
2018.--						
January	6,373	581	2,603	89	---	---
February	4,051	195	2,557	128	---	---
March	6,631	514	5,829	169	---	---
April	6,897	558	6,217	221	---	651
May	6,048	481	4,876	244	---	563
June	8,394	631	7,102	356	---	834
July	5,662	894	6,125	381	---	1,235
August	7,523	1,033	4,744	615	---	1,639
September	6,745	1,551	5,415	395	25	1,541
October	9,550	2,400	6,698	758	25	1,351
November	8,485	3,143	8,282	571	24	1,250
December	7,341	2,576	9,216	880	---	1,741

Table continued on next page.

Table IV-12--Continued
CAAS: U.S. imports by month, January 2017 through December 2020

Year and month	Indonesia	Italy	Oman	Romania	Serbia	Slovenia
	Quantity (short tons)					
2019.--						
January	6,969	3,320	8,005	971	38	1,819
February	7,724	2,132	9,035	935	65	1,067
March	6,419	3,154	9,762	1,315	---	2,244
April	8,183	3,110	11,797	1,478	---	1,771
May	8,640	2,308	6,797	1,157	---	1,459
June	5,943	2,173	6,700	569	---	774
July	5,235	3,472	5,125	767	527	876
August	4,398	2,211	6,911	503	750	721
September	3,028	1,437	9,464	1,486	513	443
October	1,122	1,684	8,159	666	644	529
November	248	1,762	4,577	600	221	470
December	820	1,843	4,872	641	1,049	205
2020.--						
January	578	1,441	5,786	1,166	129	382
February	899	1,094	3,549	507	543	241
March	394	1,345	6,463	416	209	351
April	755	1,982	7,182	371	16	360
May	1,841	1,463	4,155	251	---	404
June	1,270	1,416	6,902	364	21	783
July	165	852	7,054	159	49	993
August	29	1,091	6,240	93	---	410
September	472	775	3,509	196	---	950
October	59	447	8,225	92	---	148
November	---	293	4,846	93	---	271
December	---	624	5,514	48	---	306

Table continued on next page.

Table IV-12--Continued
CAAS: U.S. imports by month, January 2017 through December 2020

Year and month	South Africa	Spain	Taiwan	Turkey	Subject sources	Nonsubject sources	All import sources
	Quantity (short tons)						
2017.--							
January	3,739	118	64	655	25,092	46,772	71,864
February	4,484	28	68	957	22,732	43,182	65,914
March	3,410	167	44	419	28,575	54,781	83,356
April	3,077	119	74	457	25,608	57,746	83,353
May	1,978	168	109	642	28,755	75,782	104,537
June	1,806	279	22	621	22,145	62,564	84,709
July	5,484	147	13	669	29,183	66,760	95,943
August	3,260	133	23	325	26,647	61,125	87,772
September	1,644	11	89	487	21,894	49,839	71,732
October	1,501	157	17	510	27,824	52,414	80,238
November	1,023	120	34	426	31,089	51,605	82,694
December	2,542	235	24	510	26,421	54,959	81,381
2018.--							
January	4,875	142	185	762	27,559	103,618	131,177
February	1,282	134	468	958	22,316	40,240	62,556
March	3,536	326	1,758	760	33,417	63,053	96,470
April	2,249	113	2,910	1,257	37,549	44,799	82,348
May	3,614	436	2,979	1,337	40,823	30,043	70,865
June	4,282	267	4,063	1,509	38,961	29,013	67,974
July	4,576	264	4,270	2,153	42,786	30,269	73,055
August	4,339	238	3,416	1,977	42,561	27,819	70,379
September	3,335	501	2,838	2,709	42,673	27,723	70,396
October	2,716	701	4,411	3,530	53,395	32,079	85,474
November	7,073	1,251	4,464	3,154	57,552	30,666	88,218
December	6,998	1,177	3,955	4,597	58,184	31,809	89,992

Table continued on next page.

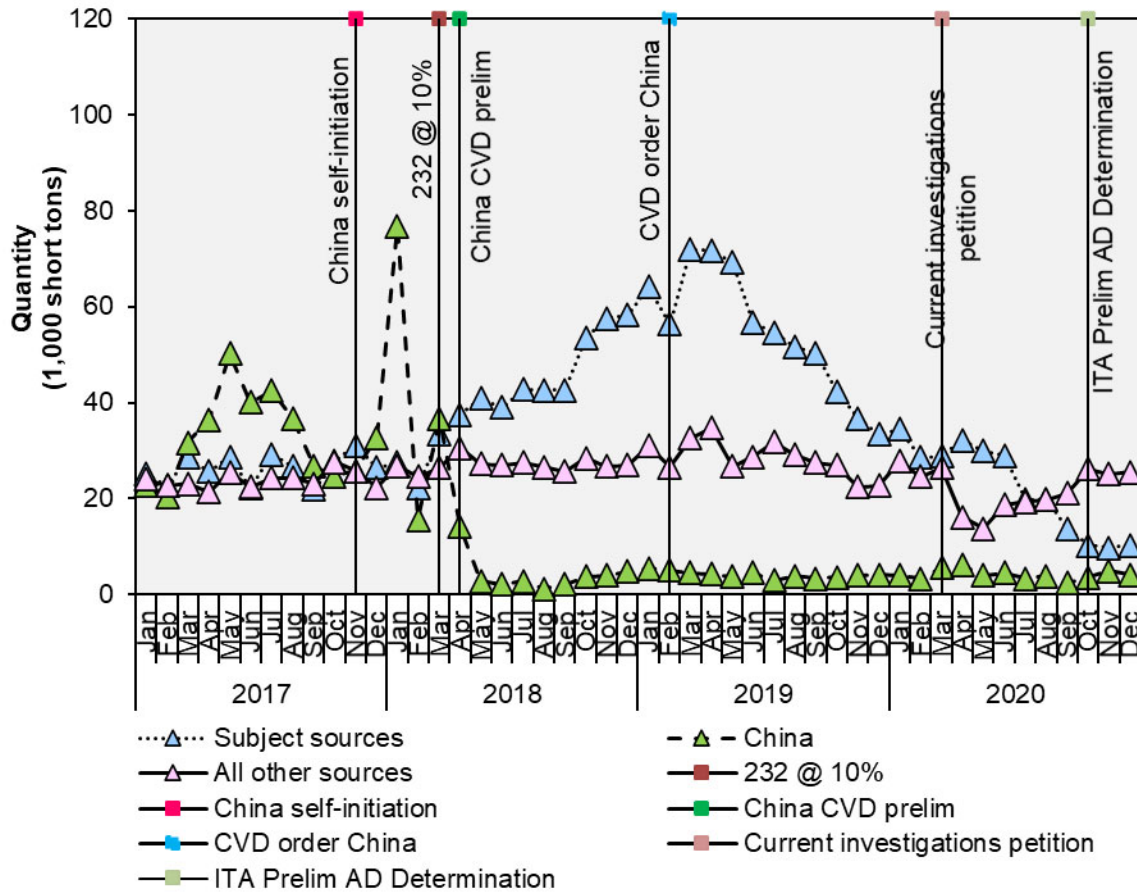
Table IV-12--Continued
CAAS: U.S. imports by month, January 2017 through December 2020

Year and month	South Africa	Spain	Taiwan	Turkey	Subject sources	Nonsubject sources	All import sources
	Quantity (short tons)						
2019.--							
January	6,859	1,846	5,379	5,875	64,163	36,503	100,666
February	3,900	1,451	5,318	5,560	56,346	31,670	88,016
March	3,402	1,759	8,163	6,158	71,845	37,030	108,875
April	5,210	2,440	7,364	3,694	71,683	38,913	110,595
May	3,939	1,773	5,145	5,258	69,257	30,384	99,641
June	3,385	2,765	3,378	5,263	56,691	33,191	89,882
July	1,701	3,339	3,267	4,916	54,690	34,804	89,494
August	2,494	1,419	6,234	2,244	51,500	33,049	84,549
September	4,574	949	4,417	2,669	50,330	30,819	81,149
October	2,940	664	4,025	3,113	42,404	30,531	72,935
November	4,738	975	2,839	4,509	36,749	26,483	63,232
December	2,468	1,288	1,666	2,307	33,358	26,794	60,151
2020.--							
January	2,844	2,496	1,706	2,579	34,470	31,665	66,135
February	2,627	1,651	2,563	2,272	28,569	27,941	56,510
March	1,549	1,752	1,330	2,991	28,903	32,068	60,970
April	1,373	835	2,693	3,574	32,130	22,295	54,425
May	1,301	1,555	3,534	5,632	29,963	17,693	47,656
June	134	1,476	4,817	4,482	28,970	23,249	52,219
July	544	978	2,263	3,578	19,789	22,606	42,396
August	838	1,548	137	2,222	19,832	23,709	43,541
September	1,303	498	449	241	13,732	23,457	37,189
October	942	279	249	253	15,543	24,971	40,514
November	566	174	158	91	9,723	30,021	39,743
December	253	528	327	167	10,318	29,716	40,034

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from official U.S. import statistics using 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, 7606.92.6095, accessed March 17, 2020.

Figure IV-6
CAAS: U.S. imports from aggregated subject and nonsubject sources, by month, January 2017 through December 2020



Source: Compiled from official U.S. import statistics using 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, 7606.92.6095, accessed March 17, 2020.

Apparent U.S. consumption

Table IV-13 and figure IV-7 present data on apparent U.S. consumption CAAS for 2017 to 2019, January-September 2019, and January-September 2020, based on questionnaire responses from U.S. producers and official import statistics. Apparent U.S. consumption increased by *** percent by quantity, from *** short tons to *** short tons and *** percent by value, from \$*** to \$*** from 2017 to 2019. However, it was lower by *** percent, by quantity and by *** percent, by value in interim 2020 compared to interim 2019.¹⁷

¹⁷ Inventories of CAAS from all import sources increased by 60,137 short tons from 2017 to 2018, and by 53,945 short tons from 2018 to 2019 before decreasing by 73,537 short tons from the end of 2019 to September 2020. Inventories of CAAS from subject import sources increased by *** short tons from 2017 to 2018 and by *** short tons from 2018 to 2019 before decreasing by *** short tons in September 2020.

Table IV-13

CAAS: Apparent U.S. consumption, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. producers' U.S. shipments	***	***	***	1,004,972	907,245
U.S. imports from.--					
Bahrain	65,162	64,944	76,865	63,058	19,361
Brazil	24,533	28,094	36,466	28,504	9,748
Croatia	---	2,816	9,183	7,756	3,083
Egypt	19	12,636	15,817	15,200	1,784
Germany	32,998	44,690	88,932	70,360	34,687
India	45,855	46,144	50,904	42,422	17,266
Indonesia	72,170	83,701	58,726	56,537	6,403
Italy, subject	***	***	***	***	***
Oman	27,798	69,663	91,204	73,597	50,840
Romania	1,457	4,807	11,087	9,180	3,523
Serbia	---	74	3,806	1,892	967
Slovenia	---	10,805	12,378	11,175	4,874
South Africa	33,947	48,875	45,611	35,464	12,513
Spain	1,683	5,549	20,667	17,740	12,788
Taiwan	581	35,717	57,196	48,666	19,493
Turkey	6,676	24,704	51,565	41,636	27,570
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	390,874	166,735	49,261	37,489	37,091
Greece	14,202	24,000	32,245	28,440	10,110
Italy, nonsubject	***	***	***	***	***
Korea	12,003	21,637	42,312	35,527	9,918
All other sources	95,259	126,915	128,075	102,423	66,192
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Table continued on next page.

Table IV-13--Continued

CAAS: Apparent U.S. consumption, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	3,340,900	2,611,926
U.S. imports from.--					
Bahrain	172,117	213,650	265,680	220,530	61,177
Brazil	60,409	88,429	110,282	88,271	26,102
Croatia	---	9,918	29,260	25,187	7,872
Egypt	49	40,227	49,587	47,853	3,769
Germany	118,500	184,295	326,141	258,502	126,396
India	105,093	128,919	140,336	117,606	43,491
Indonesia	167,315	231,241	158,405	152,391	16,872
Italy, subject	***	***	***	***	***
Oman	65,731	188,524	229,562	186,841	118,986
Romania	4,652	17,110	34,499	28,737	10,267
Serbia	---	268	11,421	6,085	2,688
Slovenia	---	37,063	41,438	37,770	12,604
South Africa	96,566	158,933	130,927	103,192	35,777
Spain	6,118	21,017	66,863	58,308	36,637
Taiwan	2,765	103,748	163,551	138,488	51,628
Turkey	18,278	77,872	142,867	117,038	71,134
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	972,686	466,231	173,231	127,066	126,553
Greece	43,402	86,858	117,479	103,384	33,825
Italy, nonsubject	***	***	***	***	***
Korea	30,623	69,288	142,441	120,394	30,014
All other sources	344,976	524,639	501,333	399,257	251,695
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Figure IV-7

CAAS: Apparent U.S. consumption, 2017-19, January to September 2019, and January to September 2020

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and compiled from official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020

U.S. market shares

U.S. market share data for CAAS are presented in table IV-14. U.S. producers' share of apparent U.S. consumption, by quantity, increased from *** percent in 2017 to *** percent in 2018 before decreasing to *** percent in 2019. U.S. producers' market share was *** percent in interim 2020 compared to *** percent in interim 2019. U.S. producers' share of apparent U.S. consumption, by value, increased from *** percent in 2017 to *** percent in 2019 and was *** percent in interim 2020 compared to *** percent in interim 2019.

Subject imports' share of the U.S. market, by quantity, increased from *** percent in 2017 to *** percent in 2018 and *** percent in 2019, but it was *** percent in interim 2020 compared to *** percent in interim 2019. Their share of the U.S. market, by value, increased from *** percent in 2017 to *** percent in 2018 and *** percent in 2019, but was lower in interim 2020 compared to interim 2019.

The share of the U.S. market of imports of CAAS from nonsubject sources, by quantity, declined from *** percent in 2017 to *** percent in 2019. During interim 2020, such imports held *** percent of the U.S. market, by quantity, compared with *** percent during interim 2019. In terms of value, imports of CAAS from nonsubject sources' share of the U.S. market decreased from *** percent in 2017 to *** percent in 2019, and was lower in interim 2020 compared to interim 2019.

Based on the import figures of CAAS from China discussed earlier, the market share accounted for by imports of CAAS from China decreased from *** percent to *** percent in quantity and from *** percent to *** percent in value during 2017-19, as investigations on CAAS from China were instituted in December 2017 and antidumping and countervailing duty orders were issued by Commerce in February 2019.

Table IV-14

CAAS: Market shares, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Apparent U.S. consumption	***	***	***	***	***
	Share of quantity (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.--					
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
Italy, nonsubject	***	***	***	***	***
Korea	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-14--Continued
CAAS: Market shares, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Value (1,000 dollars)				
Apparent U.S. consumption	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.--					
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Greece	***	***	***	***	***
Italy, nonsubject	***	***	***	***	***
Korea	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

Part V: Pricing data

Factors affecting prices

Raw material costs

The primary raw materials used to manufacture CAAS are primary aluminum and aluminum sheet scrap.¹ Other raw materials include alloying metals. CAAS is manufactured to one of three alloy series (1XXX; 3XXX; and 5XXX). 1XXX series alloys are 99 percent or more aluminum by weight. Manganese is the primary alloying metal for the 3XXX series alloys and magnesium is the primary alloying metal for the 5XXX series.² Raw materials accounted for *** percent of the cost of goods sold (“COGS”) for CAAS in 2019.

The large majority of U.S. producers (8 of 11) and slightly more than half of responding importers (42 of 80) reported that raw material prices fluctuated since 2017, and most remaining importers (28) reported increasing raw material prices. Many firms reported that the fluctuating raw material costs are passed through to the final cost to customers. Twenty of 44 responding importers, 14 of 35 purchasers, and one U.S. producer reported that the section 232 measures (discussed in greater detail in Part I of this report) had led to an increase for the price of raw materials.

The price of U.S.-produced CAAS reflects three components: the LME price for high-grade (“HG”) unwrought aluminum, the Midwest premium, and the fabrication or conversion price. The London Metal Exchange (“LME”) and the Midwest premium were the two most commonly reported sources for aluminum prices in the United States.³

The Midwest premium is a daily premium added to the LME price applicable to U.S. producers of primary unwrought aluminum.⁴ ⁵ The Midwest premium price increased sharply

¹ *Common Alloy Aluminum Sheet from China, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final)*, USITC Publication 4861, January 2019 (“USITC Publication 4861”), p. V-1.

² Petition, p. 7.

³ USITC Publication 4861, p. V-3.

⁴ The Midwest premium is based on physical spot deals, bids, and offers reported through a daily survey of spot buyers and sellers, and uses a representative sample of producers, traders, and different types of end users. It reflects both deliveries to a typical freight consumer in a broad U.S. Midwest region via truck or rail as well as the transaction costs. S & P Global Platts, *Methodology and Specifications Guide: Nonferrous*, April 2017.

⁵ Prices of imported CAAS do not include the Midwest premium, but could include a regional premium for primary unwrought aluminum in certain geographic markets, such as Rotterdam or Shanghai. Respondents’ joint prehearing brief, pp. 4, 14, 57.

between December 2017 and May 2018, increasing by *** percent (figure V-1).⁶ Overall, the Midwest premium price increased by *** percent from January 2017 to September 2020, and fluctuated until December 2020. The LME plus Midwest premium has fluctuated since 2017, although the LME plus Midwest premium increased overall by *** percent from January 2017 to September 2020, and further increased by *** percent from September 2020 to December 2020. The LME plus Midwest premium increased sharply since May 2020 (figure V-2).

Figure V-1
Aluminum price indices: Midwest premium price index of aluminum, monthly, January 2017-December 2020

* * * * *

Source: ***.

⁶ The substantial price change in 2018 was due to uncertainty in the aluminum market from a Mexican antidumping investigation on Chinese aluminum foil, falling Japanese aluminum premium offers, tariffs, sanctions, and supply concerns. USITC Publication 4861, p. V-1.

Figure V-2

Aluminum price indices: LME (High Grade) and LME plus Midwest premium price index of aluminum, monthly, January 2017-December 2020

* * * * *

Source: ***.

Old aluminum sheet scrap (non-cast aluminum scrap items for consumption by secondary smelters) is also used as a raw material input in the production of CAAS.⁷ Aluminum sheet scrap prices decreased by *** percent from January 2017 to May 2020, and overall, priced decreased by *** percent from January 2017 to September 2020. Aluminum sheet scrap prices continued to increase by *** percent from September 2020 through December 2020 (figure V-3). Prices in December 2020 were *** percent higher than in January 2017.

⁷ USITC Publication 4861, p. V-2 S&P Global Platts, "Specifications Guide: Nonferrous," March 2020, <https://www.spglobal.com/platts/plattscontent/assets/files/en/our-methodology/methodology-specifications/nonferrous.pdf>, retrieved April 14, 2020.

Figure V-3

Old aluminum sheet scrap: Aluminum sheet scrap prices, monthly, January 2017-December 2020

* * * * *

Source: ***.

Transportation costs to the U.S. market

Transportation costs for CAAS shipped from subject countries to the United States ranged from 3.0 percent (Croatia) to 6.8 percent (Korea), and averaged 4.4 percent for subject countries. These estimates were derived from official import data and represent transportation and other charges on imports.⁸

U.S. inland transportation costs

All responding U.S. producers and most importers (64 of 69) reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 2.4 to 5.0 percent while the majority of importers reported costs of 0.5 to 8.0 percent.

⁸ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2017 and then dividing by the customs value based on the HTS subheading 7303.00.0030.

Pricing practices

Pricing structure

As described earlier, the price of U.S.-produced CAAS reportedly reflects three components: the LME price for high-grade (“HG”) unwrought aluminum, the Midwest premium, and the fabrication or conversion price.⁹ The LME price and the Midwest premium are published, and conversion prices are generally negotiated through contracts.¹⁰ Prices of imported CAAS do not include the Midwest premium.¹¹

U.S. producers reported that their conversion prices had increased during 2017-19, but 8 of 11 U.S. producers reported that their conversion prices were lower during January-September 2020 than during January-September 2019. As seen in table V-1, U.S. producers’ average conversion prices increased from *** in 2017 to *** in 2019.¹² Average conversion prices during January-September 2020 were ***.

⁹ Respondents’ joint prehearing brief, pp. 57, 78; Hearing transcript, p. 173 (Lutz). LME is the base aluminum price and the Midwest premium is a “theoretical freight and other costs of transportation charged to the Midwest” for the aluminum raw material. Conversion costs are the costs for converting the raw material into coil product plus profit. Hearing transcript, pp. 130-1 (Keown).

¹⁰ Hearing transcript, p. 127-128 (McCarter). ***, Petitioners’ prehearing brief, p. 54, Exhibit 15.

¹¹ Conference transcript, p. 116 (Mowry).

¹² If ***, average conversion prices increased to *** in 2019.

Table V-1
CAAS: U.S. producers' reported conversion prices

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Reported conversion pricing (dollars per pound)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth (formerly Aleris)	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	***	***
All firms except Texarkana	***	***	***	***	***

Note: Average conversion rates are weighted by the producers' total net sales.

Source: Compiled from data submitted in response to Commission questionnaires.

Pricing methods

U.S. producers and importers reported setting prices primarily using transaction-by-transaction negotiations and contracts (table V-2).

Table V-2
CAAS: U.S. producers' and importers' reported price setting methods, by number of responding firms

Method	U.S. producers	U.S. importers
Transaction-by-transaction	10	53
Contract	10	29
Set price list	4	11
Other	---	11
Responding firms	11	73

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers reported selling most of their CAAS under annual contracts, while importers reported selling the vast majority of their CAAS through spot sales or under short-term contracts (table V-3).

Table V-3

CAAS: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2019

Item	U.S. producers	Subject U.S. importers
Share (percent)		
Share of commercial U.S. shipments.--		
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***

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

Source: Compiled from data submitted in response to Commission questionnaires.

Most annual and long-term contracts are negotiated during the fourth quarter for the following year(s), do not allow for price renegotiation over the duration of the contract, and contain a contracted volume range.¹³ Petitioner Commonwealth stated that some of its customers opted to not conclude annual contracts or to contract for lower volumes of domestic product in 2019 because of large inventories of subject imports that were available, and that it re-instituted its depot program to supply customers with common products from its inventory.¹⁴ Petitioner Constellium stated that some of its customers “held off” until the first quarter of 2020 to conclude contracts because they were able to purchase large amounts of imports at low prices from importers’ inventories on the spot market.¹⁵

U.S. producers and importers reported that short term contracts ranged from 30 to 180 days, and long term contracts generally ranged from two to three years.¹⁶ Most responding U.S. producers and importers reported that their contracts do not allow for price renegotiation, are fixed in quantity¹⁷ and price, and are indexed to raw materials.¹⁸

Eighteen purchasers reported that they purchase product daily, 15 purchase weekly, 13 purchase monthly, 4 purchase quarterly, and 3 purchases annually. Purchaser *** reported purchasing needed, and purchaser *** reported having *** contracts with its suppliers. The vast majority of responding purchasers (48 of 52) reported that their purchasing frequency had not changed since 2017. Most purchasers (42 of 52) contact 1

¹³ Hearing transcript, pp. 25 (Hermann), 39 (Vrablec), 41 (Stemple), and p. 143 (McCarter, Stemple, Vrablec, Ricci, Keown, Hseih), p. 213 (Lutz).

¹⁴ Petitioners’ prehearing brief, p. 72; Hearing transcript, pp. 35, 97 (Keown), p. 46 (Roush).

¹⁵ Hearing transcript, p. 42 (Stemple).

¹⁶ U.S. producer *** reported that its long-term contracts could last for up to 7 years.

¹⁷ Petitioners stated that contracts contain a minimum and maximum contract volume. Petitioners’ prehearing brief, p. 36; Hearing transcript, p. 144 (Vrablec, Keown, McCarter, Ricci, Stemple).

¹⁸ Firms cited Platts, Midwest Transaction price (LME plus Midwest premium) indices. See pp. V-1-5.

to 5 suppliers before making a purchase. Five purchasers (***) reported contacting up to 10 suppliers before making a purchase.

Sales terms and discounts

U.S. producers and importers typically quote prices on a delivered basis, although 14 of 69 responding importers reported quoting prices on an f.o.b. basis. Six of 11 U.S. producers offer a total volume discount, 6 offer no discounts, and 2 offer a quantity discount. U.S. producer *** reported that it offered a **. Most importers (50 of 72) reported offering no discounts, 10 offer a quantity discount, 7 offer a total volume discount, and 11 reported other types of discounts including payment term discounts and early payment discounts.

Price leadership

Purchasers reported several price leaders: Aleris (13 purchasers), Arconic (10), Novelis (7), Ta Chen International (5), Constellium (3), and AA Metals, Commonwealth, Granges, Hydro, and Texarkana (1 each). U.S. purchaser *** reported that most domestic mills will not provide a quote until Aleris provides a quote and purchaser *** reported that “Arconic is generally believed to be the U.S. market leader in CAAS products and we believe that they usually lead price increase announcements. From an import perspective, Ta Chen and AA Metals have been the significant market leaders there. They seemingly beat each other up for share growth, having a negative impact on the overall market.”

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following products shipped to unrelated U.S. customers during January 2017-September 2020.

Product 1.-- Alloy 3003, H-14 temper, 0.125” thick, 48” wide

Product 2.-- Alloy 5052, H-32 temper, 0.125” thick, 48” wide

Product 3.-- Alloy 3105, H-26 temper, 0.016” thick, 24” wide

Product 4.-- Alloy 3003, H-14 temper, 0.063” thick, 48” wide

Product 5.— Alloy 1350, F Temper, 0.125” thick, 50” wide¹⁹

Nine U.S. producers and 33 importers²⁰ provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.^{21 22} Pricing data reported by these firms accounted for 3.6 percent of U.S. producers’ shipments of CAAS and 11.9 percent of U.S. shipments of combined subject imports and the following percentages of U.S. shipments of subject imports from each subject country in 2019:²³

- Bahrain – *** percent
- Brazil – *** percent
- Croatia – *** percent
- Egypt – *** percent
- Germany – *** percent
- India – *** percent
- Indonesia – *** percent
- Italy, subject – *** percent
- Oman – *** percent
- Romania – *** percent
- Serbia – *** percent
- Slovenia – *** percent
- South Africa – *** percent
- Spain – *** percent
- Taiwan – *** percent
- Turkey – *** percent

¹⁹ This pricing product was added to the four pricing products that were requested during the preliminary phase of these investigations at the request of Respondent Oman Aluminium. See Oman Aluminium Comments on Draft Questionnaires, pp. 7-8.

²⁰ Staff did not include pricing data reported by importer *** for all pricing products that did not match pricing product definitions.

²¹ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

²² ***. See email with ***, February 11, 2021.

²³ Pricing coverage is based on U.S. shipments reported in questionnaires.

Price data for products 1-5 are presented in tables V-4 to V-8 and figures V-4 to V-8. Nonsubject country prices are presented in Appendix H and now include sources for which Commerce has issued negative final determinations.

Table V-4
CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		Bahrain			Brazil		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-4--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Croatia			Egypt			Germany		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

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Table V-4--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	India			Indonesia			Italy, subject		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

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Table V-4--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Oman			Romania			Serbia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-4--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Slovenia			South Africa			Spain		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-4--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Taiwan			Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Note: Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Table V-5

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		Bahrain			Brazil		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-5--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Croatia			Egypt			Germany		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-5--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	India			Indonesia			Italy, subject		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

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Table V-5--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Oman			Romania			Serbia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-5--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Slovenia			South Africa			Spain		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-5--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Taiwan			Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Note: Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Table V-6

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		India			Oman		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-6--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	South Africa			Taiwan		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2020:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***

Table continued on next page.

Table V-6 --Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2020:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***

Note: Product 3: Alloy 5052, H-32 temper, 0.125" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Table V-7

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		Bahrain			Brazil		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-7--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Croatia			Egypt			Germany		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-7--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	India			Indonesia			Italy, subject		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-7--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Romania			Serbia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2020:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***

Table continued on next page.

Table V-7--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Slovenia			South Africa			Spain		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table V-7--Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	Taiwan			Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2020:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***

Note: Product 4: Alloy 3003, H-14 temper, 0.063" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Table V-8

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		Oman		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:					
Jan.-Mar.	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***
2018:					
Jan.-Mar.	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***
2019:					
Jan.-Mar.	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***
2020:					
Jan.-Mar.	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***

Note: Product 5: Alloy 1350, F Temper, 0.125" thick, 50" wide.

Note: *** U.S. producers, ***, reported commercial shipments of Alloy 1350 F-temper, but products did not fall within the size range of pricing product 5. ***.

Source: Compiled from data submitted in response to Commission questionnaires.

Figure V-4
CAAS: Weighted-average prices and quantities of domestic and imported product 1, by quarter,
January 2017-September 2020

* * * * *

Figure V-5
CAAS: Weighted-average prices and quantities of domestic and imported product 2, by quarter,
January 2017-September 2020

* * * * *

Figure V-6
CAAS: Weighted-average prices and quantities of domestic and imported product 3, by quarter,
January 2017-September 2020

* * * * *

Figure V-7
CAAS: Weighted-average prices and quantities of domestic and imported product 4, by quarter,
January 2017-September 2020

* * * * *

Figure V-8
CAAS: Weighted-average prices and quantities of domestic and imported product 5, by quarter,
January 2017-September 2020

* * * * *

Price trends

In general, prices increased during January 2017-September 2020. Table V-9 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent to *** percent during January 2017-September 2020 while import price increases ranged from 8.2 percent to 38.8 percent. Domestic prices decreased by *** and prices for German CAAS decreased by *** percent pricing product 2. Figures V-9 and V-10 show indexed prices by product for U.S. producers and importers, respectively.

Table V-9
CAAS: Summary of weighted-average f.o.b. prices for products 1-5 from the United States and subject sources

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Average quarterly change (percent)	Change in price over period (percent)
Product 1: United States	***	***	***	***	***
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	---	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***

Table continued on next page.

Table V-9--Continued

CAAS: Summary of weighted-average f.o.b. prices for products 1-5 from the United States and subject sources

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period ¹ (percent)
Product 2: United States	***	***	***	***
Bahrain	***	***	***	***
Brazil	***	***	***	***
Croatia	***	***	***	***
Egypt	***	***	***	***
Germany	***	***	***	***
India	***	***	***	***
Indonesia	***	***	***	***
Italy, subject	***	***	***	***
Oman	***	***	***	***
Romania	***	***	***	***
Serbia	***	***	***	***
Slovenia	***	***	***	***
South Africa	***	***	***	***
Spain	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Product 3: United States	***	***	***	***
India	***	***	***	***
Oman	***	***	***	***
South Africa	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***

Table continued on next page.

Table V-9 --Continued

CAAS: Summary of weighted-average f.o.b. prices for products 1-5 from the United States and subject sources

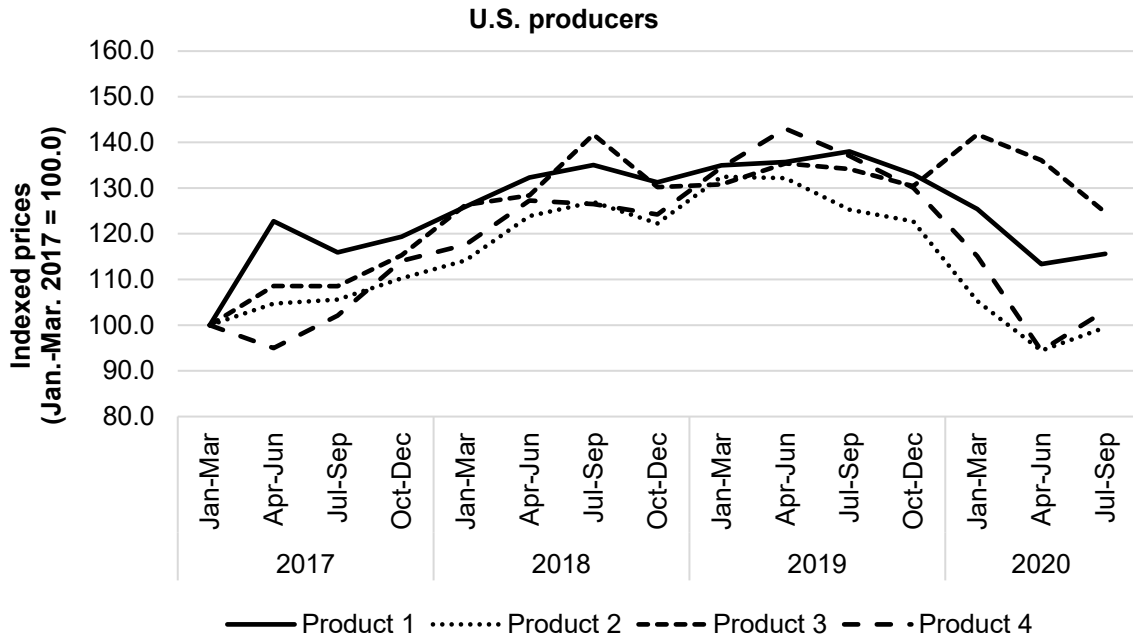
Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period ¹ (percent)
Product 4: United States	***	***	***	***
Bahrain	***	***	***	***
Brazil	***	***	***	***
Croatia	***	***	***	***
Egypt	***	***	***	***
Germany	***	***	***	***
India	***	***	***	***
Indonesia	***	***	***	***
Italy, subject	***	***	***	***
Oman	***	***	***	***
Romania	***	***	***	***
Serbia	***	***	***	***
Slovenia	***	***	***	***
South Africa	***	***	***	***
Spain	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Product 5: United States	***	***	***	***
Oman	***	***	***	***
Subject sources	***	***	***	***

Note: Percentage change from the first quarter in which data were available to the last quarter in which price data were available.

Source: Compiled from data submitted in response to Commission questionnaires.

Figure V-9

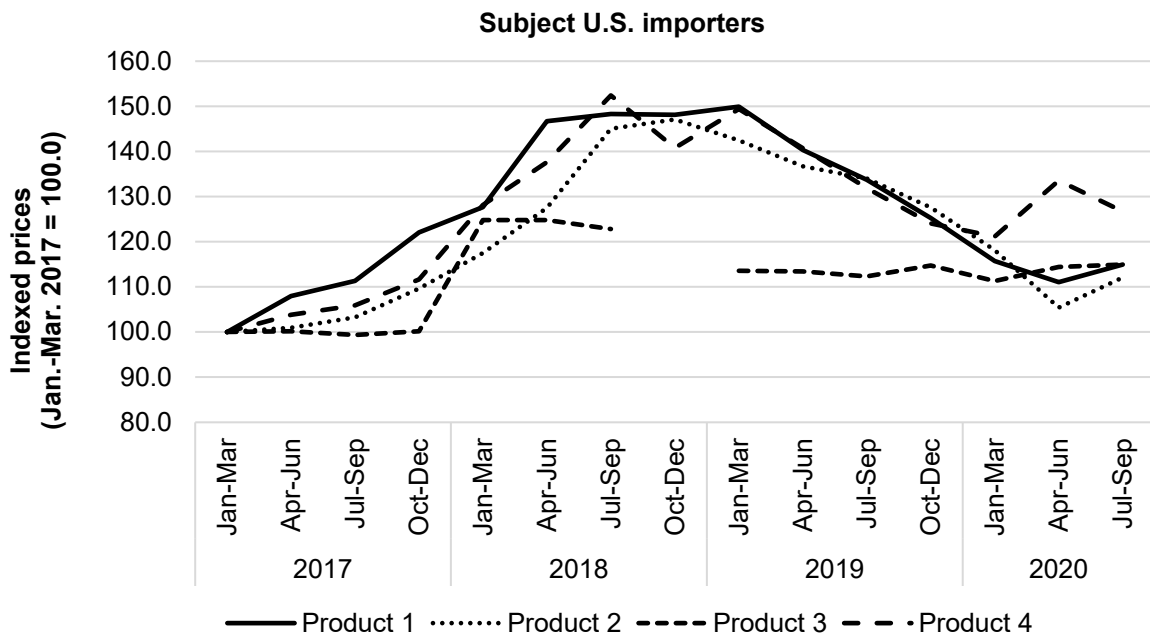
CAAS: Indexed U.S. producer prices, January 2017 through September 2020



Source: Compiled from data submitted in response to Commission questionnaires.

Figure V-10

CAAS: Indexed subject importer prices, January 2017 through September 2020



Note: Indexed prices for pricing product 5 are not available because pricing data were not available during Jan.-Mar. 2017.

Source: Compiled from data submitted in response to Commission questionnaires.

Price comparisons

As shown in table V-10, prices for product imported from subject sources were below those for U.S.-produced product in 262 of 479 instances (196 million pounds); margins of underselling ranged from 0.0 percent to 33.7 percent. In the remaining 216 instances (69 million pounds), prices for product from subject sources were between 0.0 and 74.2 percent above prices for the domestic product. The highest number of instances and the largest quantity of underselling occurred during 2019. The average margins of both underselling and overselling generally decreased from 2017 to 2020.

Table V-10
CAAS: Instances of underselling/overselling and the range and average of margins, by country, January 2017-September 2020

Source	Underselling				
	Number of quarters	Quantity (pounds)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Total, underselling	262	196,306,771	10.2	0.0	33.7
2017	***	***	***	***	***
2018	***	***	***	***	***
2019	***	***	***	***	***
2020	***	***	***	***	***
Total, underselling	262	196,306,771	10.2	0.0	33.7
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Total, underselling	262	196,306,771	10.2	0.0	33.7

Table continued on next page.

Table V-10--Continued

CAAS: Instances of underselling/overselling and the range and average of margins, by country, January 2017-September 2020

Source	(Overselling)				
	Number of quarters	Quantity (pounds)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Total, overselling	216	69,352,374	(12.3)	(0.0)	(74.2)
2017	***	***	***	***	***
2018	***	***	***	***	***
2019	***	***	***	***	***
2020	***	***	***	***	***
Total, overselling	216	69,352,374	(12.3)	(0.0)	(74.2)
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Total, overselling	216	69,352,374	(12.3)	(0.0)	(74.2)

Note: These data include only quarters in which there is a comparison between the U.S. and subject product. No U.S. producers reported data for pricing product 5.

Source: Compiled from data submitted in response to Commission questionnaires.

Lost sales and lost revenue

In the preliminary phase of the investigations, the Commission requested that U.S. producers of CAAS report purchasers with which they experienced lost sales or revenue due to competition from imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, or Turkey during 2017-19. Seven U.S. producers submitted lost sales and lost revenue allegations. These

seven U.S. producers identified 45 firms with which they lost sales or revenue (21 consisting of lost sales allegations, 3 consisting of lost revenue allegations, and 21 consisting of both types of allegations). Countries listed in one or more lost sales or lost revenue include Bahrain (28), Brazil (13), Croatia (1), Egypt (4), Germany (18), Greece (15), India (22), Indonesia (13), Italy (4), Korea (37), Oman (32), Slovenia (7), South Africa (11), Spain (19), Taiwan (14), and Turkey (28).²⁴ Allegations covered 2017 to 2019 and almost all lost sales were reported as occurring during contract negotiations.

In the final phase of the investigations, of the 11 responding U.S. producers, 11 reported that they had to either reduce prices and 9 roll back announced price increases. All 11 firms reported that they had lost sales.

Staff contacted 203 purchasers and received responses from 52 purchasers.²⁵ Responding purchasers reported purchasing or importing 2.8 million short tons of CAAS from domestic, subject, and other sources during 2017-19 (table V-11).

²⁴ This may include multiple allegations against the same purchaser. No lost sales or lost revenue allegations were made against product from Romania and Serbia.

²⁵ Four purchasers (***) submitted lost sales lost revenue survey responses in the preliminary phase but did not submit purchaser questionnaire responses in the final phase.

Table V-11
 CAAS: Purchasers' reported purchases and imports, 2017-19

Purchaser	Purchases and imports in 2017-19 (short tons)			Change in domestic share (pp, 2017-19)	Change in subject country share (pp, 2017-19)
	Domestic	Subject sources	All other		
***	***	***	***	***	***
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***	***	***	***	***	***

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Table V-11--Continued
CAAS: Purchasers' reported purchases and imports, 2017-19

Purchaser	Purchases and imports in 2017-19 (short tons)			Change in domestic share (pp, 2017-19)	Change in subject country share (pp, 2017-19)
	Domestic	Subject sources	All other		
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	1,652,362	546,532	634,238	(0.3)	5.7

Note: All other includes all other sources and unknown sources.
 Note: Percentage points (pp) change: Change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

Source: Compiled from data submitted in response to Commission questionnaires.

Of the 52 responding purchasers, 34 reported that, since 2017, they had purchased imported CAAS from subject countries instead of U.S.-produced product (table V-12). Twenty-seven of these purchasers reported that subject import prices were lower than U.S.-produced product, and 13 of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Nine purchasers estimated the quantity of CAAS from subject countries purchased instead of domestic product; quantities ranged from *** short tons to *** short tons (table V-13). Purchasers identified availability of

capacity, supplier diversification, quality, consistency, specific product availability, terms and credit, customer preference, and the ability to meet technical specifications as non-price reasons for purchasing imported rather than U.S.-produced product. Purchaser *** reported that while price is often a primary factor, there were many instances in which availability drove its decision, and purchaser *** similarly reported that in 2017 prices of some imports may have been lower or on par with domestic CAAS, but import prices increased over domestic costs once duties, premiums, and domestic capacity was taken into account.

Table V-12
CAAS: Purchasers' responses to purchasing subject instead of domestic product, by country

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity subject purchased (short tons)
Bahrain	16	11	5	***
Brazil	7	6	1	***
Croatia	3	2	---	***
Egypt	8	7	2	***
Germany	13	7	2	***
India	14	13	7	***
Indonesia	9	9	3	***
Italy, subject	8	4	---	***
Oman	11	9	5	***
Romania	6	4	---	***
Serbia	1	1	---	***
Slovenia	2	2	---	***
South Africa	10	9	3	***
Spain	8	7	1	***
Taiwan	7	6	1	***
Turkey	9	6	2	***
Subject sources	34	27	13	***
Greece (nonsubject)	12	10	1	***
Italy, nonsubject	1	---	---	***
Korea (nonsubject)	10	4	1	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table V-13

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

Table V-13--Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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Table V-13--Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

Table V-13--Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

Table V-13--Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	Yes--34; No--13	Yes--27; No--7	Yes--13; No--21	***	

Source: Compiled from data submitted in response to Commission questionnaires.

Of the 52 responding purchasers, 6 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; 26 reported that they did not know (tables V-14 and V-15). Seventeen purchasers reported that U.S. producers had not reduced their prices. The reported estimated price reduction ranged from 5 to 25 percent.

Table V-14

CAAS: Purchasers' responses to U.S. producer price reductions, by country

Source	Count of purchasers reporting U.S. producers reduced prices	Simple average of estimated U.S. price reduction (percent)	Range of estimated U.S. price reductions (percent)
Bahrain	2	***	***
Brazil	1	***	***
Croatia	1	***	***
Egypt	1	***	***
Germany	1	***	***
India	4	***	***
Indonesia	5	***	***
Italy	2	***	***
Oman	2	***	***
Romania	1	***	***
Serbia	1	***	***
Slovenia	1	***	***
South Africa	3	***	***
Spain	2	***	***
Taiwan	3	***	***
Turkey	2	***	***
Subject sources	6	***	***
Greece (nonsubject)	1	***	***
Korea (nonsubject)	1	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table V-15
CAAS: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Producers reduced price (Y/N)	If produced reduced prices:	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
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***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***

Table continued on next page.

Table V-15--Continued

CAAS: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Producers reduced price (Y/N)	If produced reduced prices:	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***

Table continued on next page.

Table V-15 --Continued

CAAS: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Producers reduced price (Y/N)	If produced reduced prices:	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total / average	Yes--6; No--17	***	

Note: Purchaser *** reported that

Source: Compiled from data submitted in response to Commission questionnaires.

Part VI: Financial experience of U.S. producers

Background

Eleven U.S. producers (Aleris, Arconic, Constellium, Commonwealth, Golden, Granges, Jupiter, JW Aluminum, Novelis, Texarkana, and Vulcan) reported their financial results on CAAS operations for January 2017 through September 2020.¹ *** and *** accounted for *** percent and *** percent, respectively, of total reported sales quantity. The remaining U.S. producers' shares ranged from *** percent (***) to *** percent (***). Golden, Jupiter, JW Aluminum, and Vulcan are privately-held companies, while the other U.S. producers are part of large multinational corporations.²

Texarkana began operations in early 2019, restarting assets previously owned by Arconic.³ In addition to Texarkana's start-up operations, CAAS financial results reflect other

¹ *** reported their financial results on the basis of International Financial Reporting Standards (IFRS). All other U.S. producers reported their financial results on the basis of U.S. generally accepted accounting principles (GAAP). All U.S. producers reported their financial results for calendar-year periods. Staff conducted a verification of Arconic's financial results and related information on January 25, 2021.

² Arconic's CAAS operations are included in its Rolled Products segment. Arconic 2020 10-Q (Q3), p. 13. Constellium's U.S. CAAS operations are included in its Aerospace & Transportation segment (Ravenswood, West Virginia facility). Constellium's 2018 20-F, pp. 34-35. The U.S. CAAS operations of Granges are part of its Americas segment. Granges 2018 Annual Report, p. 16, p. 52, p. 75. Novelis' U.S. CAAS operations, which now include former Aleris facilities with the exception of the Lewisport, Kentucky facility (see footnote 5), are part of its North America segment. Novelis 2020 10-Q (Q-3), p. 42. Texarkana is a subsidiary of Ta Chen International. The company's ultimate parent company, Ta Chen Stainless Pipe, is a publicly traded company. Ta Chen Stainless Pipe 2019 Annual Report, p. 8.

³ As described in a public news article published in 2018, "Ta Chen Stainless Pipe will acquire an {idled} aluminum processing plant in the U.S. state of Texas from Arconic, moving some production to America in response to the Trump administration's tariffs. The Taiwanese company said Tuesday that U.S.-based unit Ta Chen International, a distributor of aluminum and stainless steel products, will spend up to \$350 million to purchase the entire facility from Arconic, which was spun off from American aluminum giant Alcoa in 2016. The deal is expected to close by the end of the year. The acquisition marks the first foray into U.S. production for Ta Chen, which procures aluminum products from China and elsewhere and sells them to American companies for final processing." *Taiwan company buys US aluminum plant to skirt Trump tariffs*, Nikkei Asian Review, <https://asia.nikkei.com/Business/Business-deals/Taiwan-company-buys-US-aluminum-plant-to-skirt-Trump-tariffs>, retrieved on March 31, 2020.

***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.

producer-specific initiatives, such as reduction and/or idling of certain operations, as well as expansion activity and plant upgrades. Additionally, in April 2020 the aluminum products, aluminum extrusions, and architectural products operations of Arconic were spun off to form a separate publicly traded company.⁴ Also in April 2020, Novelis purchased Aleris, subsequently divesting Aleris' European and North American automotive assets, including the Lewisport, Kentucky facility, now owned by Commonwealth.⁵

Operations on CAAS

Table VI-1 and table VI-2 present income-and-loss data for U.S. producers' CAAS operations and corresponding changes in average per short ton values, respectively. Table VI-3 presents a variance analysis of these financial results and table VI-4 presents selected firm-specific financial information.⁶ Appendix E presents financial results specific to commercial sales of CAAS reroll and all other CAAS.

⁴ Arconic 2020 10-Q (Q3), p. 7. The existing publicly traded company was renamed Howmet Aerospace and continues operating the engine products, engineered structures, fastening systems, and forged wheels business units. Ibid.

⁵ Novelis 2020 10-Q (Q3), p. 17. As presented in this section of the report, the previously reported CAAS operations of Aleris are identified as (1) Aleris, now owned by Novelis, representing the, Lincolnshire, Illinois, Davenport, Iowa, Clayton, New Jersey, Uhrichsville, Ohio, Ashville, Ohio, Richmond, Virginia, and Buckhannon, West Virginia facilities, and (2) Commonwealth, an independent company, representing the Lewisport, Kentucky facility.

⁶ The Commission's variance analysis is calculated in three parts: sales variance, cost of goods sold (COGS) variance, and sales, general, and administrative (SG&A) expenses variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expenses variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. As summarized at the bottom of the table, the price variance is from sales, the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expenses variances. In general, the utility of the Commission's variance analysis is enhanced when product mix remains the same throughout the period. Changes in the U.S. industry's CAAS product mix and/or customer mix were reportedly minimal and did not substantially impact the trend of average unit values. Petitioners' postconference brief, Exhibit 1 (response to USITC staff questions), p. 8.

Table VI-1

CAAS: Results of operations of U.S. producers, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Total net sales	***	***	***	1,060,850	946,436
	Value (1,000 dollars)				
Total net sales	***	***	***	3,530,182	2,728,664
Cost of goods sold.--					
Raw materials	***	***	***	2,029,786	1,584,165
Direct labor	***	***	***	296,058	269,792
Other factory costs	***	***	***	701,149	633,574
Total COGS	***	***	***	3,026,993	2,487,531
Gross profit or (loss)	***	***	***	503,189	241,133
SG&A expense	***	***	***	176,995	173,554
Operating income or (loss)	***	***	***	326,194	67,579
Interest expense	***	***	***	110,617	60,190
All other expenses	***	***	***	26,693	17,332
All other income	***	***	***	7,153	4,881
Net income or (loss)	***	***	***	196,037	(5,062)
Depreciation/amortization	***	***	***	142,484	149,033
Est. cash flow from operations	***	***	***	338,521	143,971
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	***	***	***	57.5	58.1
Direct labor	***	***	***	8.4	9.9
Other factory costs	***	***	***	19.9	23.2
Average COGS	***	***	***	85.7	91.2
Gross profit or (loss)	***	***	***	14.3	8.8
SG&A expense	***	***	***	5.0	6.4
Operating income or (loss)	***	***	***	9.2	2.5
Net income or (loss)	***	***	***	5.6	(0.2)
	Ratio to total COGS (percent)				
Cost of goods sold.--					
Raw materials	***	***	***	67.1	63.7
Direct labor	***	***	***	9.8	10.8
Other factory costs	***	***	***	23.2	25.5
Average COGS	***	***	***	100.0	100.0

Table continued on next page.

Table VI-1--Continued

CAAS: Results of overall operations of U.S. producers, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit value (dollars per short ton)				
Total net sales	***	***	***	3,328	2,883
Cost of goods sold.--					
Raw materials	***	***	***	1,913	1,674
Direct labor	***	***	***	279	285
Other factory costs	***	***	***	661	669
Average COGS	***	***	***	2,853	2,628
Gross profit or (loss)	***	***	***	474	255
SG&A expense	***	***	***	167	183
Operating income or (loss)	***	***	***	307	71
Net income or (loss)	***	***	***	185	(5)
	Number of firms reporting				
Operating losses	***	***	***	3	5
Net losses	***	***	***	3	6
Data	***	***	***	11	11

Note: Conversion/fabrication price relates to revenue and is the amount charged by U.S. producers to convert raw materials into finished CAAS. Conversion cost is the direct labor and overhead costs associated with conversion/fabrication of raw materials into finished CAAS. Based on the information presented in this table, average per short ton effective conversion price (average sales value minus average raw material cost) was *** (2017), *** (2018), *** (full-year 2019), *** (interim 2019), and *** (interim 2020). Effective conversion price as a ratio of sales, the inverse of raw material cost to sales ratio, was *** percent (2017), *** percent (2018), *** percent (full-year 2019), 42.5 percent (interim 2019), and 41.9 percent (interim 2020). Effective conversion price as a ratio of sales is the amount leftover to cover conversion cost.

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-2

CAAS: Changes in AUVs, 2017-19, January-September 2019, and January-September 2020

Item	Between calendar years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
Change in AUVs (percent)				
Total net sales	***	***	***	▼(13.4)
Cost of goods sold.-- Raw materials	***	***	***	▼(12.5)
Direct labor	***	***	***	▲2.1
Other factory costs	***	***	***	▲1.3
Average COGS	***	***	***	▼(7.9)
Change in AUVs (dollars per short ton)				
Total net sales	***	***	***	▼(445)
Cost of goods sold.-- Raw materials	***	***	***	▼(240)
Direct labor	***	***	***	▲6
Other factory costs	***	***	***	▲9
Average COGS	***	***	***	▼(225)
Gross profit or (loss)	***	***	***	▼(220)
SG&A expense	***	***	***	▲17
Operating income or (loss)	***	***	***	▼(236)
Net income or (loss)	***	***	***	▼(190)

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-3

CAAS: Variance analysis of the overall financial results of U.S. producers, 2017-19, January-September 2019, and January-September 2020

Item	Between calendar years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
	Value (1,000 dollars)			
Net sales:				
Price variance	***	***	***	(420,783)
Volume variance	***	***	***	(380,735)
Net sales variance	***	***	***	(801,518)
COGS:				
Cost variance	***	***	***	212,997
Volume variance	***	***	***	326,465
COGS variance	***	***	***	539,462
Gross profit variance	***	***	***	(262,056)
SG&A expenses:				
Cost/expense variance	***	***	***	(15,648)
Volume variance	***	***	***	19,089
Total SG&A expense variance	***	***	***	3,441
Operating income variance	***	***	***	(258,615)
Summarized as:				
Price variance	***	***	***	(420,783)
Net cost/expense variance	***	***	***	197,349
Net volume variance	***	***	***	(35,180)

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-4
CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Total net sales (short tons)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	1,060,850	946,436
	Total net sales (1,000 dollars)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	3,530,182	2,728,664
	Cost of goods sold (1,000 dollars)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	3,026,993	2,487,531

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Gross profit or (loss) (1,000 dollars)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	503,189	241,133
	SG&A expenses (1,000 dollars)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	176,995	173,554
	Operating income or (loss) (1,000 dollars)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	326,194	67,579

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Net income or (loss) (1,000 dollars)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	196,037	(5,062)
	COGS to net sales ratio (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	85.7	91.2
	Gross profit or (loss) to net sales ratio (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	14.3	8.8

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	SG&A expense to net sales ratio (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	5.0	6.4
	Operating income or (loss) to net sales ratio (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	9.2	2.5
	Net income or (loss) to net sales ratio (percent)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	5.6	(0.2)

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit net sales value (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	3,328	2,883
	Unit raw materials (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	1,913	1,674
	Unit direct labor (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	279	285

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit other factory costs (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	661	669
	Unit conversion cost (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	940	954
	Unit COGS (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	2,853	2,628

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit gross profit or (loss) (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	474	255
	Unit SG&A expenses (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	167	183
	Unit operating income or (loss) (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	307	71

Table continued on next page.

Table VI-4--Continued

CAAS: Results of operations of U.S. producers, by firm, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit net income or (loss) (dollars per short ton)				
Aleris	***	***	***	***	***
Arconic	***	***	***	***	***
Commonwealth	***	***	***	***	***
Constellium	***	***	***	***	***
Golden	***	***	***	***	***
Granges	***	***	***	***	***
Jupiter	***	***	***	***	***
JW Aluminum	***	***	***	***	***
Novelis	***	***	***	***	***
Texarkana	***	***	***	***	***
Vulcan	***	***	***	***	***
All firms	***	***	***	185	(5)

Note 1: Texarkana did not have CAAS operations prior to 2019. See footnote 5 regarding the CAAS operations/facilities reflected in Aleris and Commonwealth financial results.

Note 2: Conversion cost is the sum of direct labor and other factory costs.

Note 3: ***. USITC auditor prehearing notes.

Source: Compiled from data submitted in response to Commission questionnaires.

Revenue

The majority of CAAS revenue reflects commercial sales with a relatively small amount representing transfer sales to related parties and internal consumption.^{7 8} Given the predominance of commercial sales, a single revenue line item is presented in the tables below.

⁷ ***. *** U.S. producer questionnaire, II-11.

⁸ *** reported internal consumption. ***. Email submission from *** on behalf of *** , response to USITC staff questions, April 2, 2020. ***. Email submission from *** on behalf of *** , response to USITC staff questions, January 8, 2021.

***. Email with attachment from *** to USITC staff, December 29, 2020. ***. USITC auditor notes (prehearing).

Sales quantity

On an overall basis, the U.S. industry's total CAAS sales quantity increased throughout the full-year period, reaching its highest level in 2019, and was lower in January-September 2020 compared to January-September 2019.⁹ While magnitudes varied, most U.S. producers reported the same directional pattern of higher sales quantity in 2018, a mixed pattern of higher and lower sales quantity in 2019, and primarily lower sales quantity in January-September 2020 compared to January-September 2019. As noted previously, Texarkana began operations in 2019 and therefore had no sales prior to that year. Of those U.S. producers with operations throughout the period, *** the largest company-specific increase in sales quantity in 2019, attributable to a notable increase in its ***

⁹ During the preliminary phase of these investigations, reported information indicated that CAAS total sales quantity declined in full-year 2019. The change in the pattern of full-year sales quantity for the final phase primarily reflects the inclusion of commercial sales of CAAS reroll (see also footnote 10). Inasmuch as the same underlying quantity can be reported more than once (i.e., as a commercial sale of CAAS reroll and again as finished CAAS, the same directional pattern reported for the preliminary phase (increasing sales quantity between 2017 and 2018 and declining sales quantity between 2018 and 2019) is present when commercial sales of CAAS reroll are excluded. See also Appendix E (table E-5).

***.¹⁰ *** were the *** U.S. producers reporting higher sales quantity in January-September 2020 compared to January-September 2019.¹¹

Value

In general, average per short ton sales value and raw material cost shared the same directional pattern throughout the period, reflecting the common industry practice of passing through raw material cost (i.e., aluminum) in CAAS sales value.¹² On the revenue side and notwithstanding the decline in corresponding average raw material cost in 2019, the essentially static average sales value in 2019 compared to 2018 is consistent with higher conversion prices earlier in the year, which subsequently declined; e.g., effective conversion price as a ratio to sales value (see note to table VI-1) was at its highest level in January-September 2019.

Table VI-4 also shows that company-specific average sales values covered a relatively wide range with *** (2017-18, interim 2019, interim 2020) and *** (full-year 2019) reporting the highest average sales value and *** reporting the lowest.

¹⁰ ***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

¹¹ ***. Email with attachment from *** to USITC staff, December 30, 2020.

¹² Petitioners contend that “Domestic producers rely on a number of different pricing formulas in selling CAAS. The two principal elements in the pricing formula, however, are: (1) the fabrication price (the price charged to the customer for converting primary aluminum, scrap, and alloying elements into a finished CAAS product), and (2) the mechanism for pricing the aluminum content of the finished product. The mechanism for pricing the aluminum content of the finished product may be fixed for the duration of the contract, lagged to reflect the average price for the month prior to the date of invoice, or established as of the date of invoice. Most companies (including ***) fix the cost of a product’s aluminum content based on the London Metal Exchange (“LME”) value, plus the Midwest Transaction Premium (“MWTP”) as of the date that is ***. Petitioners’ postconference brief, Exhibit 1 (response to USITC staff questions), p. 8.

Cost of goods sold and gross profit or loss

Raw materials

The largest component of COGS is raw material cost, which ranged from *** percent of total COGS (2017) to *** percent (2018).¹³ Raw material cost primarily represents a combination of primary and scrap aluminum, but also includes alloys and other secondary inputs. On a company-specific basis and with respect to the metal component, U.S. producers varied in terms of their relative shares of primary versus scrap aluminum, as well as the extent to which they used semi-finished inputs.¹⁴

As noted above, U.S. producers often use a pass through formula to better match CAAS sales values and the cost of raw material consumed in production. A number of U.S. producers also reported using derivative financial instruments, in various forms, to minimize the impact of fluctuations in the cost of primary and scrap aluminum, as well as other inputs. While most U.S. producers use derivatives to some extent for hedging purposes, the classification of related hedging gains or losses in reported financial results varies.¹⁵

Table VI-4 shows that, while magnitudes varied, virtually all U.S. producers reported the same directional pattern of change in average per short ton raw material costs: increasing in 2018, decreasing in 2019 (** excepted), and lower in January-September 2020 compared to

¹³ ***. *** U.S. producer questionnaire, III-7.

¹⁴ ***. *** U.S. producer questionnaire, III-9c (note 1). ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.

¹⁵ ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020. Of those companies that reported hedging gains and losses, these items were typically included as components of raw materials and/or other factory costs.

January-September 2019 (***) excepted). Similar to the pattern of average sales values, company-specific average raw material costs covered a relatively wide range.

Direct labor and other factory costs

On an overall basis, direct labor cost is the smallest component of total COGS, ranging from *** percent of total COGS (2018) to 10.8 percent (January-September 2020). While average per short ton direct labor cost fluctuated somewhat, it remained within a relatively narrow range throughout the period. Other factory costs, the second largest component of COGS, accounted for *** percent of total COGS (2018) to 25.5 percent (January-September 2020) and, as compared to direct labor cost, covered a somewhat broader range on an average basis. While magnitudes varied, most U.S. producers reported increasing average conversion costs (direct labor and other factory costs combined) throughout the period (see table VI-4).

COGS

In addition to the pattern of underlying aluminum costs in general, which impacted all U.S. producers to some extent, the COGS of many U.S. producers also reflect (directly or indirectly) the impact of company-specific costs/expenses associated with changes in manufacturing activity, primarily plant expansions and upgrades.¹⁶ Most U.S. producers reported increasing average per short ton COGS in 2018, declines in 2019, and lower average COGS in January-September 2020 compared to January-September 2019.

Gross profit or loss

The U.S. industry's total gross profit increased during the full-year period, reflecting an increase in both total sales (quantity and value) and corresponding gross profit ratio (total gross profit divided by total sales), and was lower in January-September 2020 compared to January-September 2019, reflecting lower total sales (quantity and value) and a contraction in gross profit ratio. In 2018, the industry's gross profit ratio expanded as average per short ton sales

¹⁶ ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020. ***. *** U.S. producer questionnaire, III-10.

value increased at a faster rate than average COGS. In contrast, continued expansion of the gross profit ratio in 2019 reflects an essentially static average sales value coupled with a decline in average COGS. The lower gross profit ratio in January-September 2020 compared to January-September 2019 reflects a percentage decline in average sales value that exceeded the corresponding decline in average per short ton COGS (see table VI-2).

The majority of U.S. producers reported overall increases in total gross profit during the full year period followed by lower gross profit in January-September 2020 compared to January-September 2019. *** were the *** U.S. producers that reported higher gross profit in January-September 2020 compared to January-September 2019.¹⁷ ***, which account for a large amount of the overall decline in gross profit in January-September 2020 compared to January-September 2019, attributed these declines to lower conversion/fabrication prices and sales quantity.¹⁸ With regard to the Novelis acquisition

¹⁷ ***. Email with attachment from *** to USITC staff, December 30, 2020. ***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

¹⁸ ***. Email submission from *** on behalf of ***, response to USITC staff questions, January 21, 2021.

***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

of Aleris and subsequent divestment of the Lewisport, Kentucky facility, the impact on interim 2020 financial results was ***.¹⁹

As shown in table VI-4, *** U.S. producers reported gross losses throughout all or most of the period: *** reported gross losses throughout the period;²⁰ *** reported gross losses in 2017 and 2018, transitioned to a gross profit in 2019, and

¹⁹ Email submission from *** on behalf of ***, response to USITC staff questions, January 20, 2021. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021. ***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

²⁰ ***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

returned to a gross loss in January-September 2020;²¹ *** reported a gross loss in that year and in January-September 2020.²²

SG&A expenses and operating income or loss

While company-specific SG&A expense ratios (total SG&A expenses divided by total sales) covered a relatively wide range, they generally exhibited, with some exceptions, limited period-to-period fluctuations. Most U.S. producers reported their highest SG&A expense ratio in January-September 2020, reflecting a combination of either lower sales, reported by the majority of U.S. producers, and/or higher SG&A expenses, reported by some U.S. producers.

The U.S. industry's operating income (on an absolute basis and as a share of sales) increased during the full-year period to its highest level in 2019 and then was lower in January-September 2020 compared to January-September 2019. For the U.S. industry as a whole, as well as on a company-specific basis, the pattern of operating results was generally determined at the gross level.

Interest expense, other expenses and income, and net income or loss

The U.S. industry's net results followed the same directional pattern as operating results throughout the period: increasing during the full-year period and lower in January-September 2020 compared to January-September 2019. While net losses would generally be expected for

²¹ ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.
***. Email submission from *** on behalf of ***, response to USITC staff questions, January 8, 2021.

²² ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.
***. Ibid.

U.S. producers reporting low and/or negative operating results, the magnitude of company-specific net losses also reflects the presence of interest expense and/or other expenses.²³

Capital expenditures and research and development expenses

Table VI-5 presents U.S. producers' capital expenditures and research and development (R&D) expenses related to their CAAS operations. Table VI-6 presents firm-specific narrative descriptions of capital expenditures and R&D expenses.

Table VI-5
CAAS: Capital expenditures and research and development (R&D) expenses of U.S. producers, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Capital expenditures (1,000 dollars)				
All firms	***	***	***	230,558	138,778
	Research and development expenses (1,000 dollars)				
All firms	***	***	***	10,864	6,537

Note: The facility now operated by Texarkana was purchased from Arconic in 2018. ***. See footnote 3.

Source: Compiled from data submitted in response to Commission questionnaires.

²³ ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020. ***. Ibid.

Table VI-6
CAAS: Narrative descriptions of U.S. producers' capital expenditures and R&D expenses since January 1, 2017

Firm	Narrative
Capital expenditures	
Aleris	***
Arconic	***
Commonwealth	***
Constellium	***
Golden	***
Granges	***
Jupiter	***
JW Aluminum	***
Novelis	***
Texarkana	***
Vulcan	***
R&D expenses:	
Aleris	***
Arconic	***
Commonwealth	***

Table continued on next page.

Table VI-6--Continued

CAAS: Narrative descriptions of U.S. producers' capital expenditures and R&D expenses since January 1, 2017

Firm	Narrative
R&D expenses--continued	
Constellium	***
Golden	***
Granges	***
Jupiter	***
JW Aluminum	***
Novelis	***
Texarkana	***
Vulcan	***

Note: In addition to information submitted in response to Commission questionnaires, narrative statements in this table are also based on company-specific responses to preliminary and final-phase staff follow-up questions.

Source: Compiled from data submitted in response to Commission questionnaires.

Assets and return on assets

Table VI-7 presents data on the U.S. producers' total net assets and operating return on net assets related to operations on CAAS.²⁴

Table VI-7
CAAS: Total net assets and operating return on net assets of U.S. producers, 2017-19

Firm	Calendar year		
	2017	2018	2019
	Total net assets (1,000 dollars)		
All firms	***	***	***
	Operating return on assets (percent)		
All firms	***	***	***

Note: ***.

Source: Compiled from data submitted in response to Commission questionnaires.

Capital and investment

The Commission requested the U.S. producers of CAAS to describe any actual or potential negative effects on its return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey. Table VI-8 tabulates the responses regarding actual negative effects on investment, growth, and development, as well as anticipated negative effects. Table VI-9 presents the narrative responses of U.S. producers regarding actual and anticipated negative effects on investment, growth, and development.

²⁴ With respect to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which, in many instances, are not product specific. Allocation factors were presumably necessary to report total asset values specific to U.S. producers' CAAS operations. The ability of U.S. producers to assign total asset values to discrete product lines affects the meaningfulness of operating return on net assets.

Table VI-8

CAAS: Negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Item	No	Yes
Negative effects on investment	***	***
Cancellation, postponement, or rejection of expansion projects		***
Denial or rejection of investment proposal		***
Reduction in the size of capital investments		***
Return on specific investments negatively impacted		***
Other		***
Negative effects on growth and development	***	***
Rejection of bank loans		***
Lowering of credit rating		***
Problem related to the issue of stocks or bonds		***
Ability to service debt		***
Other		***
Anticipated negative effects of imports	***	***

Note: *** reported “no” regarding actual negative effects on investment. *** reported “no” regarding actual negative effects on growth and development. *** reported “yes” regarding anticipated negative effects due to subject imports.

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-9

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Negative impact on investment:	
Cancellation, postponement, or rejection of expansion projects	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Denial or rejection of investment proposal	
***	***
Reduction in the size of capital investments	
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-9--Continued

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Negative impact on investment--continued	
Reduction in the size of capital investments--continued	
***	***
Return on specific investments negatively impacted	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Other:	
***	***
***	***
***	***
Negative impact on growth and development:	
Lowering of credit rating	
***	***
Problem related to the issue of stocks or bonds	
***	***
Ability to service debt	
***	***

Table continued on next page.

Table VI-9--Continued

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Negative impact on growth and development--continued	
Ability to service debt--continued	
***	***
Other	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Anticipated effects of imports:	
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-9--Continued

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Anticipated effects of imports--continued	
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in *Parts IV* and *V*; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in *Part VI*. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in Bahrain

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Bahrain.³ The Commission received a useable questionnaire response from one firm: Gulf Aluminium Rolling Mill B.S.C. (c) ("Gulf Aluminium"). This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Bahrain in 2019. According to estimates requested of the responding Bahraini producer (Gulf Aluminium), its production of CAAS in Bahrain accounts for *** production of CAAS in Bahrain during 2019. Table VII-1 presents information on the CAAS operations of Gulf Aluminium in Bahrain.

Table VII-1
CAAS: Summary data for Bahraini producer Gulf Aluminium, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Gulf Aluminium	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

Gulf Aluminium reported *** since January 1, 2017.

³ This firm was identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-2 presents information on the CAAS operations of Bahraini producer Gulf Aluminium. Gulf Aluminium's capacity to produce CAAS *** during 2017-19 and was *** during interim 2020 as compared with interim 2019. Its capacity is projected to *** during 2020 and 2021. Gulf Aluminium's production of CAAS decreased by *** percent from 2017 to 2019 and was *** percent lower during interim 2020 compared with interim 2019. This decrease in production is consistent with ***.⁴ Gulf Aluminium's CAAS production is projected to decrease by *** percent from 2019 to 2020, but then increase by *** percent from 2020 to 2021, ending overall above 2019 levels.

During 2017-19, interim 2019, and interim 2020, Gulf Aluminium's export shipments accounted for *** of its reported shipments of CAAS. Export shipments to the United States increased by *** percent from 2017 to 2019 and were *** percent lower during interim 2020 compared with interim 2019.⁵ Exports to all other markets decreased by *** percent during 2017-19 and were *** percent higher in interim 2020 than in interim 2019. As a share of total shipments, exports to the United States increased from *** percent in 2017 to *** percent in 2019, while exports to all other markets decreased from *** percent in 2017 to *** percent in 2019. Projections indicate that exports to the United States are expected to fluctuate but decrease overall by *** percent between 2019 and 2021, while exports to all other markets are expected to increase by *** percent. Other export markets identified by Gulf Aluminium included ***.⁶

⁴ Gulf Aluminium explained ***. Email from ***, January 19, 2021.

⁵ Gulf Aluminium reported ***. Email from ***, January 19, 2021.

Gulf Aluminium also reported ***. Gulf Aluminium foreign producer questionnaire response, section II-2c.

⁶ Gulf Aluminium foreign producer questionnaire response, section II-8.

Table VII-2

CAAS: Data for Bahraini producer Gulf Aluminium, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

Gulf Aluminium reported *** on the same equipment and machinery used to produce CAAS.

Gulf Aluminium was asked about constraints on production capacity and reported ***.⁷

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Bahrain are the United States, Saudi Arabia, and France (table VII-3). During 2019, the United States was the leading export market for those exports from Bahrain, accounting for 68.6 percent of exports by quantity, followed by Saudi Arabia and France, accounting for 5.9 percent and 5.3 percent, respectively.

⁷ Gulf Aluminium foreign producer questionnaire response, section II-3d.

Table VII-3
Aluminum plates, sheets and strip: Exports from Bahrain by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	65,268	64,944	76,960
Saudi Arabia	5,167	6,211	6,621
France	5,006	6,476	5,984
Australia	6,904	6,623	5,401
United Arab Emirates	4,450	11,536	4,364
Malaysia	3,020	2,651	2,410
Netherlands	4,777	3,045	2,206
Italy	6,322	7,154	1,819
Singapore	4,961	4,172	1,252
All other destination markets	13,731	12,555	5,249
Total exports	119,604	125,367	112,266
	Share of quantity (percent)		
United States	54.6	51.8	68.6
Saudi Arabia	4.3	5.0	5.9
France	4.2	5.2	5.3
Australia	5.8	5.3	4.8
United Arab Emirates	3.7	9.2	3.9
Malaysia	2.5	2.1	2.1
Netherlands	4.0	2.4	2.0
Italy	5.3	5.7	1.6
Singapore	4.1	3.3	1.1
All other destination markets	11.5	10.0	4.7
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics of imports from Bahrain (constructed export statistics for Bahrain) under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Brazil

The Commission issued foreign producers' or exporters' questionnaires to six firms believed to produce and/or export CAAS from Brazil.⁸ Usable responses to the Commission's questionnaire were received from three firms: Companhia Brasileira de Alumínio ("CBA"), CBA Itapissuma Ltda. ("CBA Itapissuma"), and Novelis do Brasil Ltda. ("Novelis do Brasil"). These firms' exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Brazil in 2019. According to estimates requested of the responding Brazilian producers, the production of CAAS in Brazil reported in questionnaires accounts for approximately *** percent of overall production of CAAS in Brazil during 2019.

CBA is one of the major Brazilian producers of aluminum. CBA is a fully integrated aluminum company, producing unwrought, semi-finished, and wrought aluminum products. It acquired CBA Itapissuma, formerly Arconic Industria e Comercio de Metais, in 2020, allowing CBA to expand its production capacity for aluminum sheet.⁹ CBA produces flat-rolled coil and sheet between 0.3 and 4mm thick in 1XXX, 3XXX, and 5XXX series alloys. In addition to flat-rolled sheet, the company also produces embossed and stucco sheet, aluminum foil, and extruded products as a part of its wrought production.¹⁰ CBA has eight production facilities located throughout the country, and is headquartered in São Paulo, Brazil.¹¹

Novelis do Brasil also accounts for a large portion of Brazil's CAAS production. Novelis do Brasil has a regional office in São Paulo, Brazil, as well as production facilities in Utinga and Pindamonhangaba, Brazil. The plant in Utinga produces aluminum foil products while the plant in Pindamonhangaba produces aluminum sheet for beverage cans and consumer and industrial packaging.¹²

Alcast do Brasil Ltda ("Alcast"), which did not respond to a producer/exporter questionnaire, is composed of two aluminum companies, Alcast Laminados de Alumínio, and Panelux, which produced a combined 24 thousand metric tons (26,455 short tons) of aluminum

⁸ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁹ CBA, "Our Story," <https://www.cba.com.br/en/cba/nossa-trajetoria/>, retrieved January 15, 2021.

¹⁰ CBA, "Products," <https://www.cba.com.br/en>, retrieved January 15, 2021.

¹¹ CBA, "Where We Are," <https://www.cba.com.br/en/cba/onde-estamos/>, retrieved January 15, 2021.

¹² Novelis, "Locations," <https://novelis.com/contact/>, retrieved January 15, 2021.

per year.¹³ Alcast Laminados de Alumínio produces aluminum coiled sheet in thicknesses between 0.3 mm and 1.5 mm, among other products.¹⁴ Panelux produces aluminum-based cooking utensils.¹⁵

Table VII-4 presents information on the CAAS operations of the responding producers and exporters in Brazil.

Table VII-4
CAAS: Summary data for producers in Brazil, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
CBA	***	***	***	***	***	***
CBA Itapissuma	***	***	***	***	***	***
Novelis do Brasil	***	***	***	***	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-5, producers in Brazil reported several operational and organizational changes since January 1, 2017.

¹³ Alcast, "Home," <https://alcast.com.br/?lang=en>, retrieved January 13, 2021. Production figures include some out of scope product.

¹⁴ Alcast Laminados de Alumínio, "Products," <https://alcastlaminados.com.br/en/produtos/chapas>, retrieved January 13, 2021.

¹⁵ Panelux, "About Us," <https://panelux.com.br/a-panelux/sobre-nos>, retrieved January 13, 2021.

Table VII-5

CAAS: Brazilian producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Expansions:	
***	***
Acquisitions:	
***	***
***	***
Prolonged shutdowns or curtailments:	
***	***
***	***
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CAAS

Table VII-6 presents information on the CAAS operations of the responding producers and exporters in Brazil. Brazilian producers' capacity to produce CAAS fluctuated but increased by *** percent from 2017 to 2019 and was *** percent lower during interim 2020 than in interim 2019. Production decreased by *** percent during 2017-19 and was *** percent lower during interim 2020 than in interim 2019. Capacity utilization decreased by *** percentage points from 2017 to 2019 and was *** percentage points lower during interim 2020 than in interim 2019. Brazilian producers' capacity and production are projected to fluctuate but increase overall by *** percent and *** percent, respectively, between 2019 and 2021. These projections are consistent with ***.¹⁶

¹⁶ *** foreign producer questionnaire response, section II-2a.

Brazilian producers' home market shipments decreased by *** percent during 2017-19 and were *** percent lower during interim 2020 than in interim 2019. Home market shipments accounted for *** of all reported shipments during each period for which data were collected. Brazilian producers' export shipments of CAAS to the United States fluctuated but increased by *** percent during 2017-19, while their export shipments to all other markets fluctuated but decreased by *** percent during the same period. Export shipments to the United States and export shipments to all other markets were *** percent and *** percent lower, respectively, during interim 2020 than in interim 2019. Brazilian producers' export shipments to the United States are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall below 2019 levels. Similarly, Brazilian producers' export shipments to all other markets are projected to fluctuate but decrease overall between 2019 and 2021. As a share of total shipments, exports to the United States increased by *** percentage points during 2017-19, while home market shipments decreased by *** percentage points during the same period. Other export markets identified by Brazilian producers included ***.¹⁷

¹⁷ *** foreign producer questionnaire responses, section II-8.

Table VII-6

CAAS: Data for producers in Brazil, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-7, responding Brazilian firms produced other products on the same equipment and machinery used to produce CAAS. Products included ***.¹⁸ As a share of total production on the same equipment as in-scope production, *** production accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-7

CAAS: Brazilian producers' overall capacity and production on the same equipment as in-scope production, 2017-2019, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁸ *** foreign producer questionnaire responses, section II-3a.

Firms were asked about constraints on production capacity and the ability to switch production between CAAS and other products. CBA Itapissuma reported ***.¹⁹ ***, CBA reported ***.²⁰ Novelis do Brasil reported ***.²¹

*** responding Brazilian producers reported the ability to shift production between CAAS and other products using the same equipment and/or labor. *** reported being able to switch production between CAAS and ***, as well as between CAAS and ***. *** further reported ***.²² *** reported being able to switch production between CAAS and ***.²³ *** reported being able to switch production between CAAS and ***. *** further reported ***.²⁴

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Brazil are the United States, Argentina, and Chile (table VII-8). During 2019, the United States was the leading export market for those exports from Brazil, accounting for 40.3 percent of exports by quantity, followed by Argentina and Chile, accounting for 29.8 percent and 13.9 percent, respectively.

¹⁹ CBA Itapissuma foreign producer questionnaire response, section II-3d.

²⁰ CBA foreign producer questionnaire response, section II-3d.

²¹ Novelis do Brasil foreign producer questionnaire response, section II-3d.

²² *** foreign producer questionnaire response, sections II-4a and II-4b.

²³ *** foreign producer questionnaire response, sections II-4a and II-4b.

²⁴ *** foreign producer questionnaire response, sections II-4a and II-4b.

Table VII-8
Aluminum plates, sheets and strip: Exports from Brazil by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	25,091	31,150	34,993
Argentina	12,199	17,660	25,885
Chile	17,065	14,196	12,072
Bolivia	389	3,041	4,242
Colombia	11,088	7,402	3,440
Panama	5,898	6,021	2,417
Guatemala	0	524	1,849
Paraguay	380	346	972
Nigeria	15,491	4,409	518
All other destination markets	8,816	579	354
Total exports	96,418	85,328	86,742
	Share of quantity (percent)		
United States	26.0	36.5	40.3
Argentina	12.7	20.7	29.8
Chile	17.7	16.6	13.9
Bolivia	0.4	3.6	4.9
Colombia	11.5	8.7	4.0
Panama	6.1	7.1	2.8
Guatemala	0.0	0.6	2.1
Paraguay	0.4	0.4	1.1
Nigeria	16.1	5.2	0.6
All other destination markets	9.1	0.7	0.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Croatia

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Croatia.²⁵ The Commission received a usable questionnaire response from one firm: Impol TLM. This firm's exports to the United States were equivalent to *** U.S. imports of CAAS from Croatia in 2019. According to estimates requested of the responding Croatian producer (Impol TLM), its production of CAAS in Croatia reported in questionnaire accounts for *** production of CAAS in Croatia during 2019. Table VII-9 presents information on the CAAS operations of Impol TLM in Croatia.

Table VII-9
CAAS: Summary data for Croatian producer Impol TLM, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Impol TLM	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-10, Impol TLM reported operational and organizational changes since January 1, 2017.

Table VII-10
CAAS: Croatian producer Impol TLM's reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

²⁵ This firm was identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-11 presents information on the CAAS operations of Croatian producer Impol TLM. Impol TLM's capacity fluctuated but decreased by *** percent from 2017 to 2019 and was *** percent lower in interim 2020 than in interim 2019. Capacity is projected to increase by *** percent from 2019 to 2020 and *** during 2021. Impol TLM's CAAS production increased irregularly by *** percent during 2017-19 and was *** percent lower in interim 2020 compared with interim 2019. Projections indicate that production is expected to decrease by *** percent from 2019 to 2020, but then increase by *** percent from 2020 to 2021, ending overall above 2019 levels. Impol TLM's capacity utilization decreased irregularly by *** percentage points during 2017-19 and was *** percentage points higher in interim 2020 than in interim 2019.

Impol TLM's export shipments accounted for *** of its total shipments during the period for which data were collected. Impol TLM's exports of CAAS to the United States increased *** and increased by *** percent during 2018-19.²⁶ Exports to the United States were *** percent lower during interim 2020 than in interim 2019 and are projected to fluctuate but decrease overall between 2019 and 2021, ending below 2019 levels. Impol TLM's exports to all other markets decrease by *** percent during 2017-19 and were *** percent higher during interim 2020 than in interim 2019. Export shipments to all other markets are projected to increase by *** percent from 2019 to 2020 and *** during 2021. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while export shipments to all other markets as a share of total shipments decreased from *** percent to *** percent during the same period. Other export markets identified by Impol TLM included ***.²⁷

²⁶ Impol TLM reported ***. Impol TLM foreign producer questionnaire response, section II-11.

²⁷ Impol TLM foreign producer questionnaire response, section II-8.

Table VII-11

CAAS: Data for Croatian producer Impol TLM, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-12, Impol TLM produced other products on the same equipment and machinery used to produce CAAS. These products included ***.²⁸ As a share of overall production on the same equipment, CAAS accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-12

CAAS: Croatian producer Impol TLM's overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

²⁸ Impol TLM foreign producer questionnaire response, section II-3a. Impol TLM ***. Ibid.

Impol TLM was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Impol TLM reported ***.²⁹

Impol TLM further reported ***.³⁰

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Croatia are Slovenia, Germany, and the United States (table VII-13). During 2019, the United States was the third largest export market for those exports from Croatia, accounting for 10.1 percent of exports by quantity, preceded by Slovenia and Germany, accounting for 65.2 percent and 11.6 percent, respectively.

²⁹ Impol TLM foreign producer questionnaire response, section II-3d.

³⁰ Impol TLM foreign producer questionnaire response, section II-4a and II-4b.

Table VII-13**Aluminum plates, sheets and strip: Exports from Croatia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	---	8,083	9,474
Slovenia	25,208	37,793	61,287
Germany	18,972	10,349	10,867
Czech Republic	5,764	5,032	5,125
Italy	4,253	2,692	2,769
Netherlands	1,995	2,029	1,765
Austria	2,242	2,503	1,205
France	1,299	745	735
Slovakia	577	399	210
All other destination markets	5,510	948	550
Total exports	65,819	70,573	93,985
	Share of quantity (percent)		
United States	---	11.5	10.1
Slovenia	38.3	53.6	65.2
Germany	28.8	14.7	11.6
Czech Republic	8.8	7.1	5.5
Italy	6.5	3.8	2.9
Netherlands	3.0	2.9	1.9
Austria	3.4	3.5	1.3
France	2.0	1.1	0.8
Slovakia	0.9	0.6	0.2
All other destination markets	8.4	1.3	0.6
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Egypt

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Egypt.³¹ The Commission received a usable questionnaire response from one firm: The Aluminium Co. of Egypt ("Egyptalum"). This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Egypt in 2019. According to estimates requested of the responding Egyptian producer (Egyptalum), its production of CAAS in Egypt reported in its questionnaire response accounts for *** production of CAAS in Egypt during 2019.

According to its company website (which might be outdated),³² Egyptalum's production capacity is 320,000 tons per year, and is expected to reach 570,000 tons by 2022.³³ All 320,000 tons of production are accounted for in Egyptalum's foundry production, which includes out-of-scope slabs, wire, cylinders, and ingots.³⁴ The company's rolling mill, which appears to be part of its oncoming production, is expected to produce 108,000 tons of hot-rolled product and 30,000 tons of cold-rolled product per year.³⁵ Table VII-14 presents information on the CAAS operations of Egyptalum in Egypt.

Table VII-14
CAAS: Summary data for Egyptian producer Egyptalum, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Egyptalum	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

³¹ These firms were identified through a review of information submitted in the petition and contained in *** records.

³² The company's website indicates a copyright date of 2018.

³³ Egyptalum, "Main," <http://www.egyptalum.com.eg/>, retrieved January 15, 2021.

³⁴ Egyptalum, "Foundry Products," <http://www.egyptalum.com.eg/staticPages.aspx?LId=3&PID=29>, retrieved January 15, 2021.

³⁵ Egyptalum, "Rolling Mill," <http://www.egyptalum.com.eg/staticPages.aspx?LId=4&PID=28>, retrieved January 15, 2021.

Changes in operations

Egyptalum reported *** since January 1, 2017.

Operations on CAAS

Table VII-15 presents information on the CAAS operations of Egyptian producer Egyptalum. During 2017-19, Egyptalum's capacity to produce CAAS **, while its production of CAAS fluctuated but increased overall by ** percent. Capacity is projected to ** during 2020 and 2021, while production is projected to decrease by ** percent from 2019 to 2020 and ** during 2021. Egyptalum's capacity utilization fluctuated but increased by ** percentage points during 2017-19.

Egyptalum's home market shipments fluctuated but decreased by ** percent during 2017-19, while export shipments to the United States increased ** and decreased **. Export shipments to all other markets decreased by ** percent during 2017-19. Export shipments to the United States were ** percent lower during interim 2020 than in interim 2019, while export shipments to all other markets and home market shipments were ** percent and ** percent higher, respectively. Export shipments to the United States as a share of total shipments fluctuated but increased from ** percent to ** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased overall, falling by ** percentage points and by ** percentage points, respectively. Export shipments to the United States are projected to fluctuate but decrease overall by ** percent between 2019 and 2021. During 2019-21, export shipments to all other markets and home market shipments are projected to increase overall by ** percent and by ** percent, respectively. Other export markets identified by Egyptalum included **. ³⁶

³⁶ Egyptalum foreign producer questionnaire response, section II-8.

Table VII-15

CAAS: Data for Egyptian producer Egyptalum, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-16, Egyptalum produced other products on the same equipment and machinery used to produce CAAS. These products included ***.³⁷ As a share of total production on the same equipment as in-scope production, Egyptalum's *** production accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-16

CAAS: Egyptian producer Egyptalum's overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

³⁷ Egyptalum foreign producer questionnaire response, section II-3a.

Egyptalum was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Egyptalum reported that its overall capacity is limited by ***.³⁸

Egyptalum reported ***. Egyptalum further reported ***.³⁹

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Egypt are Italy, the United States, Spain, and Germany (table VII-17). During 2019, the United States was the second largest export market for those exports from Egypt, accounting for 20.2 percent of exports by quantity, preceded by Italy, accounting for 71.3 percent and follow by Spain, accounting for 3.2 percent.

³⁸ Egyptalum's foreign producer questionnaire response, section II-3d.

³⁹ Egyptalum's foreign producer questionnaire, II-4a and II-4b.

Table VII-17**Aluminum plates, sheets and strip: Exports from Egypt by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	20	13,262	16,002
Italy	43,614	47,496	56,498
Spain	1,757	2,858	2,567
Germany	6,794	5,357	1,052
Turkey	1,040	1,471	771
Slovenia	2,849	908	701
France	652	557	648
Morocco	692	674	272
Saudi Arabia	490	190	212
All other destination markets	4,209	2,660	505
Total exports	62,116	75,433	79,229
	Share of quantity (percent)		
United States	0.0	17.6	20.2
Italy	70.2	63.0	71.3
Spain	2.8	3.8	3.2
Germany	10.9	7.1	1.3
Turkey	1.7	1.9	1.0
Slovenia	4.6	1.2	0.9
France	1.0	0.7	0.8
Morocco	1.1	0.9	0.3
Saudi Arabia	0.8	0.3	0.3
All other destination markets	6.8	3.5	0.6
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics of imports from Egypt (constructed export statistics for Egypt) under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Germany

The Commission issued foreign producers' or exporters' questionnaires to 38 firms believed to produce and/or export CAAS from Germany.⁴⁰ Usable responses to the Commission's questionnaire were received from four firms: Aleris Rolled Products Germany GMBH ("Aleris Germany"), Constellium Rolled Products Singen GmbH & Co. KG ("Constellium"), Hydro Aluminium Rolled Products GmbH ("Hydro Aluminium"), and Novelis Deutschland GmbH ("Novelis Deutschland"). These firms' exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Germany in 2019. According to estimates requested of the responding German producers, the production of CAAS in Germany reported in questionnaires accounts for *** production of CAAS in Germany during 2019. Industry research indicates that there are at least two other firms that produce CAAS in Germany: BFC Fahrzeugteile GmbH ("BFC"), and Martinrea Honsel Germany GmbH ("Honsel").

BFC is a multinational aluminum and stainless steel producer headquartered in Germany, with additional locations in the United States, Mexico, Turkey, and China.⁴¹ BFC produces aluminum sheet that is 0.2 mm in thickness.⁴²

Honsel produces aluminum products for the automotive sector, such as engine blocks, interior fittings, and structural parts, as well as non-automotive aluminum products, including sheet and strip. Honsel's aluminum sheet and strip is produced in thicknesses between 0.3mm and 2.0mm.⁴³

Many firms within the German aluminum industry appear to focus on the production of roof and façade systems – such as Bemo Systems GmbH,⁴⁴ Kalzip GmbH,⁴⁵ and Seele GmbH.⁴⁶

Table VII-18 presents information on the CAAS operations of the responding producers and exporters in Germany.

⁴⁰ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁴¹ Bfc, "Home Page," <https://www.bfc-profile.de/>, retrieved January 13, 2021.

⁴² Bfc, "Products," <https://www.bfc-profile.de/de/produkte/gewickeltes-vollmaterial/gewickeltes-vollmaterial.html>, retrieved January 13, 2021.

⁴³ Honsel, "Products," <https://www.honsel.com/produkte/>, retrieved January 15, 2021.

⁴⁴ Bemo, "Design & Creation," <https://www.bemo.com/de/fassadensysteme-design>, retrieved January 15, 2021.

⁴⁵ Kalzip, "About Kalzip," <https://www.kalzip.com/en/about-us/#about-kalzip>, retrieved January 15, 2021.

⁴⁶ Seele, "Company," <https://seele.com/company>, retrieved January 15, 2021.

Table VII-18

CAAS: Summary data for firms in Germany, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Aleris Germany	***	***	***	***	***	***
Constellium	***	***	***	***	***	***
Hydro Aluminium	***	***	***	***	***	***
Novelis Deutschland	***	***	***	***	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-19, responding German firms reported several operational and organizational changes since January 1, 2017.

Table VII-19

CAAS: German firms' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Plant closings:	
***	***
***	***
Revised labor agreements:	
***	***
Other:	
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CAAS

Table VII-20 presents information on the CAAS operations of the responding producers and exporters in Germany. German producers' capacity fluctuated but decreased by *** percent during 2017-19 and was *** percent lower during interim 2020 than in interim 2019. Similarly, production decreased by *** percent from 2017 to 2019 and was *** percent lower during interim 2020 than in interim 2019. The decreased capacity and production are consistent with ***,⁴⁷ Capacity utilization fluctuated but increased overall by *** percentage points during 2017-19 and was *** percentage points lower during interim 2020 than in interim 2019. Capacity and production are projected to fluctuate but decrease overall by *** percent and *** percent, respectively, during 2019-21.

German producers' home market shipments and export shipments to other markets decreased by *** percent and *** percent, respectively, during 2017-19, while export shipments to the United States increased by *** percent. Home market shipments, exports to the United States, and exports to all other markets were all lower during interim 2020 than in interim 2019. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19. Home market shipments as a share of total shipments fluctuated decreased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by *** percentage points. Export shipments to the United States are projected to decrease *** and ***. Export shipments to all other markets are projected to fluctuate but decrease overall by *** percent between 2019 and 2021, while home market shipments are projected to fluctuate but increase overall by *** percent. Other export markets identified by German producers included ***,⁴⁸

⁴⁷ *** foreign producer questionnaire response, sections II-2a and II-8.

⁴⁸ *** foreign producer questionnaire responses, section II-8.

Table VII-20

CAAS: Data for producers and exporters in Germany, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments: Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments: Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-21, responding German firms produced other products on the same equipment and machinery used to produce CAAS. Other products included ***.⁴⁹

Table VII-21

CAAS: German producers' overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

⁴⁹ *** foreign producer questionnaire responses, section II-3a.

Firms were asked about constraints on production capacity and the ability to switch production between CAAS to other products. Aleris Germany reported ***.⁵⁰ Constellium reported ***.⁵¹ Hydro Aluminium reported ***, and Novelis Deutschland reported ***.⁵²

*** of four responding German firms (***) reported *** to switch production between CAAS and other products using the same equipment and labor.⁵³ *** reported being able to switch production between ***. *** further reported ***.⁵⁴ *** reported being able to switch production between ***.⁵⁵

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Germany are the United Kingdom, Poland, France, and Belgium (table VII-22). During 2019, the United States was the fifth largest export market for those exports from Germany, accounting for 6.3 percent of exports by quantity, preceded by the United Kingdom, Poland, France, and Belgium, accounting for 20.7 percent, 7.6 percent, 7.4 percent, and 7.3 percent, respectively.

⁵⁰ Aleris Germany foreign producer questionnaire response, section II-3d.

⁵¹ Constellium foreign producer questionnaire response, section II-3d.

⁵² Hydro Aluminium and Novelis Deutschland foreign producer questionnaire responses, section II-3d.

⁵³ *** foreign producer questionnaire responses, section II-4a.

⁵⁴ *** foreign producer questionnaire response, sections II-4a and II-4b.

⁵⁵ *** foreign producer questionnaire response, sections II-4a and II-4b.

Table VII-22**Aluminum plates, sheets and strip: Exports from Germany by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	61,087	69,926	116,163
United Kingdom	425,607	389,068	381,399
Poland	98,770	121,132	140,219
France	116,608	127,095	136,709
Belgium	136,507	145,394	134,970
Netherlands	101,148	107,636	110,082
Italy	74,065	73,900	96,431
Austria	80,689	80,307	92,622
Switzerland	57,892	60,377	51,743
All other destination markets	580,078	583,215	580,699
Total exports	1,732,452	1,758,051	1,841,037
	Share of quantity (percent)		
United States	3.5	4.0	6.3
United Kingdom	24.6	22.1	20.7
Poland	5.7	6.9	7.6
France	6.7	7.2	7.4
Belgium	7.9	8.3	7.3
Netherlands	5.8	6.1	6.0
Italy	4.3	4.2	5.2
Austria	4.7	4.6	5.0
Switzerland	3.3	3.4	2.8
All other destination markets	33.5	33.2	31.5
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in India

The Commission issued foreign producers' or exporters' questionnaires to 14 firms believed to produce and/or export CAAS from India.⁵⁶ Usable responses to the Commission's questionnaire were received from three firms: Hindalco Industries Limited ("Hindalco"), Jindal Aluminium Limited ("Jindal Aluminium"), and Manaksia Aluminium Company Limited ("Manaksia"). These firms' exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from India in 2019. According to estimates requested of the responding Indian producers, the production of CAAS in India reported in questionnaires accounts for approximately *** percent of overall production of CAAS in India during 2019.

Respondent Jindal Aluminum, located outside of Bangalore, India is the self-identified second largest manufacturer of aluminum rolled products in India. According to the company's website, it produces aluminum alloy sheet with thicknesses ranging from 0.009 mm to 5 mm. Its total capacity for all aluminum rolled products is 50,000 metric tons per annum⁵⁷ (or 55,116 short tons).

Hindalco has five plants for the manufacture of flat-rolled aluminum products, which are located in Hirakud, Belur, Mouda, Renukoot, and Taloja, in India.⁵⁸ The company acquired Novelis in 2007.⁵⁹ Novelis is the self-identified "leading producer of flat-rolled aluminum products" in the world.⁶⁰

Gujarat Foils produces aluminum foil, stock, and sheet at their manufacturing facility in Gujarat, India. The firm's aluminum sheet and coil range in thicknesses from 0.3 mm to 3 mm, and its total production capacity is 12,600 metric tons per annum⁶¹ (or 13,889 short tons).⁶²

Paragon Aluminum, headquartered in New Delhi is another major producer of aluminum coils, checkered sheets (five bar and diamond), corrugated sheets, and PP cap

⁵⁶ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁵⁷ Jindal Aluminium Limited, "Flat Rolled Product," <https://jindalaluminium.com/flat-rolled-products/>, retrieved January 15, 2021.

⁵⁸ Hindalco, "Aluminium Downstream," <http://hindalco.com/operations/aluminium-downstream>, retrieved January 15, 2021.

⁵⁹ Novelis, "Hindalco Industries Completes Acquisition Of Novelis Inc," <http://investors.novelis.com/2007-05-15-hindalco-industries-completes-acquisition-of-novelis-inc>, retrieved January 13, 2021.

⁶⁰ Novelis, "About Us," <https://novelis.com/about-us/>, retrieved March 31, 2020.

⁶¹ Gujarat, "Products," <http://www.gujaratfoils.com/products-overview.html>, retrieved January 13, 2021.

⁶² Gujarat Foil's production figures include some out of scope product.

closure stocks. Its aluminum coil is produced in thicknesses ranging between 0.25 mm to 0.71 mm, while its aluminum flat sheet is produced in thicknesses from 0.65 mm to 3.25 mm. The firm’s production facility houses three casters with 3,000 metric tons (3307 short tons) of monthly production capacity. The company has sold over 1,800 metric tons (1984 short tons) per month since its inception in 2008.⁶³ Paragon sources its aluminum from BALCO and NALCO, both Indian firms, as well as a few other firms outside of India that are not specified.⁶⁴

National Aluminum Company Limited, or NALCO, operates bauxite mines and works in alumina refining and smelting, and power generation. NALCO’s smelter in Angul, India “has set up a 50,000 MT per annum (55,116 short tons) Rolled Products Unit.”⁶⁵ According to the company’s website, this unit is “export-oriented.”⁶⁶

Table VII-23 presents information on the CAAS operations of the responding producers and exporters in India.

Table VII-23
CAAS: Summary data for producers in India, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm’s total shipments exported to the United States (percent)
Hindalco	***	***	***	***	***	***
Jindal Aluminium	***	***	***	***	***	***
Manaksia	***	***	***	***	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

⁶³ This includes some out of scope product.

⁶⁴ Paragon, “Paragon Industries,” <http://www.paragonaluminium.com/profile.html>, retrieved January 13, 2021.

⁶⁵ NALCO – “Rolled Products Unit,” <https://nalcoindia.com/business/operation/rolled-products-unit/>, retrieved January 13, 2021.

⁶⁶ NALCO – “Aluminium Smelter,” <https://nalcoindia.com/business/operation/aluminium-smelter/>, retrieved January 13, 2021.

Changes in operations

As presented in table VII-24, producers in India reported several operational and organizational changes since January 1, 2017.

Table VII-24

CAAS: Indian producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Expansions:	
***	***
Revised labor agreements:	
***	***
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CAAS

Table VII-25 presents information on the CAAS operations of the responding producers and exporters in India. Indian producers' capacity to produce CAAS decreased by *** percent during 2017-19, while production increased by *** percent during the same period. Capacity and production were *** percent and *** percent lower, respectively, during interim 2020 than in interim 2019. Indian producers' capacity is projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall above 2019 levels. Production is projected to fluctuate but decrease by *** percent between 2019 and 2021. Capacity utilization increased by *** percentage points during 2017-19 and was *** percentage points lower during interim 2020 than in interim 2019.

Home market shipments increased by *** percent during 2017-19 and were *** percent lower during interim 2020 than in interim 2019. Exports to the United States and exports to all other markets fluctuated but decreased by *** percent and *** percent, respectively from 2017 to 2019. Indian producers' export shipments of CAAS to the United States were *** percent lower during interim 2020 than in interim 2019 and are projected to decrease overall by *** percent between 2019 and 2021. Export shipments to all other markets were *** percent higher during interim 2020 than in interim 2019 and are projected to increase overall by *** percent between 2019 and 2021. Other export markets identified by Indian producers included ***.⁶⁷

⁶⁷ *** foreign producer questionnaire responses, section II-8.

Table VII-25

CAAS: Data for producers in India, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-26, *** of three responding Indian firms produced other products on the same equipment and machinery used to produce CAAS.⁶⁸ Other products included ***. CAAS accounted *** of total production on the same equipment as in-scope production during the period for which data were collected.

Table VII-26

CAAS: Indian producers' overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

⁶⁸ *** did not report any production of other products on the same equipment and machinery used to produce CAAS. *** foreign producer questionnaire response, section II-3a.

Indian firms were asked about constraints on production capacity and the ability to switch production between CAAS and other products. Hindalco reported ***.⁶⁹ Manaksia reported ***.⁷⁰ Jindal Aluminium reported ***.⁷¹

*** reported being able to switch production *** as well as ***. *** further reported its ability to switch production is constrained by ***.⁷² *** reported being able to switch production between ***.⁷³

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from India are the United States, the United Arab Emirates, and Italy (table VII-27). During 2019, the United States was the top export market for those exports from India, accounting for 50.0 percent of exports by quantity, followed by the United Arab Emirates and Italy, accounting for 9.0 percent and 4.9 percent, respectively.

⁶⁹ Hindalco foreign producer questionnaire response, section II-3d.

⁷⁰ Manaksia foreign producer questionnaire response, section II-3d.

⁷¹ Jindal Aluminium foreign producer questionnaire response, section II-3d.

⁷² *** foreign producer questionnaire response, sections II-4 and II-4b.

⁷³ *** foreign producer questionnaire response, section II-4b.

Table VII-27**Aluminum plates, sheets and strip: Exports from India by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	45,658	49,419	47,475
United Arab Emirates	12,413	8,948	8,517
Italy	1,155	3,856	4,668
Nepal	2,673	3,390	3,703
Spain	390	5,197	3,465
Taiwan	1,770	2,355	3,013
Bangladesh	2,344	1,921	2,707
Ethiopia	2,306	1,500	2,546
Australia	2,459	2,138	1,695
All other destination markets	23,353	15,398	17,143
Total exports	94,520	94,123	94,932
	Share of quantity (percent)		
United States	48.3	52.5	50.0
United Arab Emirates	13.1	9.5	9.0
Italy	1.2	4.1	4.9
Nepal	2.8	3.6	3.9
Spain	0.4	5.5	3.6
Taiwan	1.9	2.5	3.2
Bangladesh	2.5	2.0	2.9
Ethiopia	2.4	1.6	2.7
Australia	2.6	2.3	1.8
All other destination markets	24.7	16.4	18.1
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Ministry of Commerce in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Indonesia

The Commission issued foreign producers' or exporters' questionnaires to four firms believed to produce and/or export CAAS from Indonesia.⁷⁴ The Commission did not receive a foreign producer/exporter questionnaire response from any firms in Indonesia.

PT Alumindo Light Metal Industry ("PT Alumindo") produces aluminum sheet and coil, aluminum circle, embossed aluminum and aluminum roofing, and aluminum foil at its factory in Sidoarjo, East Java, Indonesia. Product applications for PT Alumindo's aluminum include cooking products, packaging, building, and transportation parts.⁷⁵ According to the company website, PT Alumindo, the self-identified "largest flat rolled aluminum manufacturer in the South East Asia Region," has a production capacity of 144,000 metric tons (158,732 short tons) per annum of aluminum sheet,⁷⁶ which appears to make up the majority of its wrought production. The firm's products are available in several different alloy series including 1050, 1100, 1235, 3003, 3105, 5005, 5052, 8011 and 8079, with coils ranging in thickness from 0.3 mm to 3.2 mm and sheet ranging from 0.15 mm to 3.2 mm.⁷⁷

PT Intibumi Alumindotama Industry ("PT Intibumi") produces aluminum sheet, coil, strip, thread plate and borders, circle, and foil at its processing plant in Medan, North Sumatra, Indonesia. According to its website, PT Intibumi and its rolling plant are subsidiaries of PT Damai Abadi,⁷⁸ an aluminum extrusion company with processing plants in Medan and Jakarta.⁷⁹ The firm's aluminum flat sheet ranges in thickness from 0.18 mm to 3 mm while its aluminum coiled sheet is produced in thicknesses between 0.2 mm and 4 mm. These products are available in 1XXX, 3XXX, and 8XXX series alloys.⁸⁰ PT Intibumi's products serve the transportation, building,

⁷⁴ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁷⁵ PT Alumindo, "Products – Applications," <http://www.alumindo.com/application.php>, retrieved January 13, 2021.

⁷⁶ PT Alumindo, "Brief Profile – Overview," <http://www.alumindo.com/profil.php>, retrieved January 13, 2021.

⁷⁷ PT Alumindo, "Product Specification," http://www.alumindo.com/product_specification.php, retrieved March 31, 2020.

⁷⁸ PT Intibumi, "About Us," http://www.intibumi.com/default/about_us, retrieved January 13, 2021.

⁷⁹ Damai Abadi, "Contact Us," <https://www.damaiabadi.com/contact>, retrieved January 13, 2021.

⁸⁰ PT Intibumi, "Product Specification," http://www.intibumi.com/default/product_specification, retrieved January 13, 2021.

consumer durables, packaging, and electrical industries,⁸¹ among others, in both the domestic and international markets.⁸²

Pt Starmas Inti Aluminium Industries, headquartered in Tangerang, Indonesia produces aluminum flat sheet, coil, foil, extrusion, and finished goods. Its “three continuous casters have a total output of 3,000 metric tons (3,307 short tons) per month.”⁸³ The firm’s aluminum coil and sheet are produced in thicknesses ranging from 0.2 mm to 5 mm.⁸⁴

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Indonesia are the United States, Korea, and Canada (table VII-28). During 2019, the United States was the top export market for those exports from Indonesia by a sizable degree, accounting for 95.5 percent of exports by quantity, followed by Korea and Canada, accounting for 1.4 percent and 0.9 percent, respectively.

⁸¹ PT Intibumi, “Product Applications,” http://www.intibumi.com/default/product_applications, retrieved January 13, 2021.

⁸² PT Intibumi, “About Us,” http://www.intibumi.com/default/about_us, retrieved January 13, 2021.

⁸³ PT Starmas Inti Aluminium Industry, “Company Profile – About US,” <http://starmas.com/about-us-eng>, retrieved March 31, 2020.

⁸⁴ PT Starmas Inti Aluminium Industry, “Aluminium Rolling Mill,” <http://starmas.com/rolling-mill-eng/#aluminium-coil-eng>, retrieved March 31, 2020.

Table VII-28**Aluminum plates, sheets and strip: Exports from Indonesia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	72,308	85,094	47,484
Korea	6,254	4,560	689
Canada	785	191	470
Malaysia	560	156	399
Taiwan	280	175	312
Singapore	74	130	94
Philippines	165	97	87
New Zealand	164	117	52
Thailand	68	---	33
All other destination markets	2,068	1,850	114
Total exports	82,727	92,370	49,732
	Share of quantity (percent)		
United States	87.4	92.1	95.5
Korea	7.6	4.9	1.4
Canada	0.9	0.2	0.9
Malaysia	0.7	0.2	0.8
Taiwan	0.3	0.2	0.6
Singapore	0.1	0.1	0.2
Philippines	0.2	0.1	0.2
New Zealand	0.2	0.1	0.1
Thailand	0.1	---	0.1
All other destination markets	2.5	2.0	0.2
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Statistics Indonesia in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Italy

The Commission issued foreign producers' or exporters' questionnaires to 21 firms believed to produce and/or export CAAS from Italy.⁸⁵ Usable responses to the Commission's questionnaire were received from seven firms: Almecco S.p.a. ("Almecco"), LamiAl Srl ("LamiAl"), Novelis Italia S.p.A. ("Novelis Italia"), Profilglass SPA ("Profilglass"), Slim Aluminium S.p.A. ("Slim Aluminium"), and Slim Fusina Rolling Srl ("Slim Fusina"), as well as Laminazione Sottile S.p.A. ("Laminazione"), a nonsubject producer/exporter of CAAS from Italy.⁸⁶ These firms' exports to the United States were equivalent to *** U.S. imports of CAAS from Italy in 2019. According to estimates requested of the responding Italian producers, the production of CAAS in Italy reported in questionnaires accounts for *** production of CAAS in Italy. Table VII-29 presents information on the CAAS operations of the responding producers and exporters in Italy.

Table VII-29
CAAS: Summary data for producers in Italy, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Novelis Italia	***	***	***	***	***	***
Profilglass	***	***	***	***	***	***
Slim Aluminium	***	***	***	***	***	***
Slim Fusina	***	***	***	***	***	***
All firms	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

⁸⁵ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁸⁶ In its final determination with regard to Italy, Commerce determined that the estimated weighted-average dumping margin for Laminazione is zero. 86 FR 13309, March 8, 2021.

The Commission received questionnaire responses from two Italian resellers of CAAS: Almeco and LamiAl.⁸⁷ Export data provided by these firms are presented in table VII-30.

Table VII-30
CAAS: Summary data on resellers in Italy, 2019

Resellers	Resales exported to the United States (short tons)	Share of resales exported to the United States (percent)
LamiAl	***	***
Almeco	***	***
Total	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-31, firms in Italy reported several operational and organizational changes since January 1, 2017.

Table VII-31
CAAS: Italian producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Expansions:	
***	***
***	***
Acquisitions:	
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

⁸⁷ LamiAl reported ***. LamiAl foreign producer questionnaire response, section II-11. Almeco reported ***. Almeco foreign producer questionnaire response, section II-3d.

Operations on CAAS

Table VII-32 presents information on the CAAS operations of the responding producers and exporters in Italy. Italian producers' capacity to produce CAAS increased by *** percent during 2017-19 and was *** percent lower during interim 2020 than in interim 2019. Similarly, production increased by *** percent during 2017-19 and was *** percent lower during interim 2020 than in interim 2019. Capacity utilization increased by *** percentage points during 2017-19. Italian producers' capacity and production are projected to fluctuate but decrease by *** percent and *** percent, respectively, between 2019 and 2021.

Italian producers' total home market shipments increased by *** percent during 2017-19, but were *** percent lower during interim 2020 than in interim 2019. Italian producers' export shipments to the United States increased *** and ***, while Italian resellers' exports to the United States fluctuated but increased by *** percent during 2017-19. Italian producers' export shipments to all other markets increased by *** percent from 2017 to 2019. Italian producers' exports to the United States and exports to all other markets were *** percent and *** percent lower, respectively, during interim 2020 than in interim 2019. Italian producers' export shipments to the United States are projected to decrease by *** percent between 2019 and 2021, while Italian resellers' exports to the United States are projected to decrease by *** percent. Italian producers' export shipments to all other markets are projected to fluctuate during 2019-21, falling by *** percent overall. Other export markets identified by Italian firms included ***.⁸⁸

⁸⁸ *** foreign producer questionnaire responses, section II-8.

Table VII-32

CAAS: Data for producers and exporters in Italy, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table VII-32—Continued

CAAS: Data for producers and exporters in Italy, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Share of total exports to the United States:							
Exported by producers	***	***	***	***	***	***	***
Exported by resellers	***	***	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-33, *** responding Italian producers of CAAS produced other products on the same equipment and machinery used to produce CAAS. These products included ***.⁸⁹

⁸⁹ *** foreign producer questionnaire responses, section II-3a.

Table VII-33

CAAS: Italian producers' overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Firms were asked about constraints on production capacity and the ability to switch production between CAAS and other products. Novelis Italia reported its capacity is ***, while Profilglass reported that its capacity is ***.⁹⁰ Slim Aluminium reported that its capacity is ***, while Slim Fusina reported that its capacity is ***.⁹¹

⁹⁰ Novelis Italia and Profilglass foreign producer questionnaire responses, section II-3d.

⁹¹ Slim Aluminium and Slim Fusina foreign producer questionnaire responses, section II-3d.

*** of four Italian producers (***) reported *** to shift production between CAAS and other products using the same equipment and labor.⁹² *** reported being able to switch production ***.⁹³ *** reported being able to switch production *** and further reported ***.⁹⁴

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Italy are Germany, France, and Spain (table VII-34). During 2019, the United States was the fourth largest export market for those exports from Italy, accounting for 10.7 percent of exports by quantity, preceded by Germany, France, and Spain, accounting for 21.1 percent, 13.9 percent, and 12.6 percent, respectively.

⁹² *** foreign producer questionnaire responses, sections II-4a and II-4b.

⁹³ *** foreign producer questionnaire response, sections II-4a and II-4b.

⁹⁴ *** foreign producer questionnaire response, sections II-4a and II-4b.

Table VII-34**Aluminum plates, sheets and strip: Exports from Italy by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	3,467	17,605	41,556
Germany	68,013	80,094	82,093
France	51,961	51,525	54,283
Spain	46,115	45,527	49,226
Austria	17,163	19,515	20,371
Switzerland	19,325	21,314	18,817
United Kingdom	9,185	10,112	12,625
Poland	9,602	12,603	12,066
Slovakia	4,832	7,378	7,337
All other destination markets	103,645	95,612	91,134
Total exports	333,308	361,284	389,508
	Share of quantity (percent)		
United States	1.0	4.9	10.7
Germany	20.4	22.2	21.1
France	15.6	14.3	13.9
Spain	13.8	12.6	12.6
Austria	5.1	5.4	5.2
Switzerland	5.8	5.9	4.8
United Kingdom	2.8	2.8	3.2
Poland	2.9	3.5	3.1
Slovakia	1.4	2.0	1.9
All other destination markets	31.1	26.5	23.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Oman

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Oman.⁹⁵ The Commission received a usable questionnaire response from one firm: Oman Aluminium Rolling Company LLC ("Oman Aluminium"). This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Oman in 2019. According to estimates requested of the responding Omani producer (Oman Aluminium), the production of CAAS in Oman reported in its questionnaire accounts for *** production of CAAS in Oman during 2019. Table VII-35 presents information on the CAAS operations of Oman Aluminium in Oman.

Table VII-35
CAAS: Summary data for Omani producer Oman Aluminium, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Oman Aluminium	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

Oman Aluminium reported *** since January 1, 2017.

⁹⁵ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-36 presents information on the CAAS operations of Omani producer Oman Aluminium. During 2017-19, Oman Aluminium's capacity to produce CAAS ***, while its production of CAAS and capacity utilization increased irregularly by *** percent and *** percentage points, respectively. Oman Aluminium's production of CAAS was *** percent lower during interim 2020 than in interim 2019, while capacity ***. Capacity is projected to *** during 2020 and 2021, while production is projected to increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021.

Oman Aluminium *** home market shipments of CAAS during the period for which data were collected. Export shipments to the United States increased irregularly by *** percent during 2017-19, while export shipments to all other markets decreased irregularly by *** percent. Oman Aluminium's exports to the United States were *** percent lower during interim 2020 than in interim 2019, while its exports to all other markets were *** percent higher. Exports to the United States are projected to increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021. Similarly, exports to all other markets are projected to increase by *** percent from 2019 to 2020 and by *** from 2020 to 2021. Other export markets identified by Oman Aluminium included ***.⁹⁶

⁹⁶ Oman Aluminium foreign producer questionnaire response, section II-8.

Table VII-36

CAAS: Data for Omani producer Oman Aluminium, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-37, Oman Aluminium produced other products on the same equipment and machinery used to produce CAAS. These products included ***.⁹⁷ As a share of total production on the same equipment as in-scope production, Oman Aluminium's production of CAAS declined *** and accounted for *** during interim 2019 and interim 2020.

Table VII-37

CAAS: Omani producer Oman Aluminium's overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

⁹⁷ Oman Aluminium foreign producer questionnaire response, sections II-3a and II-4a.

Oman Aluminium was asked about constraints on production capacity and its ability to switch production between CAAS and other products. Oman Aluminium reported ***.⁹⁸

Regarding its ability to switch production between CAAS and other products, Oman Aluminium reported ***.⁹⁹ Oman Aluminium further reported that ***.

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Oman are the United States, the United Arab Emirates, and Qatar (table VII-38). During 2019, the United States was the top export market for those exports from Oman, accounting for 92.6 percent of exports by quantity, followed by the United Arab Emirates and Qatar, accounting for 4.5 percent and 1.2 percent, respectively.

⁹⁸ Oman Aluminium foreign producer questionnaire response, section II-3d.

⁹⁹ Oman Aluminium foreign producer questionnaire response, section II-4a. Oman Aluminium further reported that ***. Oman Aluminium foreign producer questionnaire response, section II-4b.

Table VII-38**Aluminum plates, sheets and strip: Exports from Oman by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	11,768	29,008	144,864
United Arab Emirates	5,365	3,222	7,078
Qatar	541	1,471	1,919
India	2,635	2,463	1,091
Lebanon	13	---	486
Egypt	---	---	402
Jordan	---	---	135
Bahrain	---	435	128
Kuwait	38	144	104
All other destination markets	1,237	1,146	288
All destination markets	21,598	37,889	156,495
	Share of quantity (percent)		
United States	54.5	76.6	92.6
United Arab Emirates	24.8	8.5	4.5
Qatar	2.5	3.9	1.2
India	12.2	6.5	0.7
Lebanon	0.1	---	0.3
Egypt	---	---	0.3
Jordan	---	---	0.1
Bahrain	---	1.1	0.1
Kuwait	0.2	0.4	0.1
All other destination markets	5.7	3.0	0.2
All destination markets	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by UN comtrade in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Romania

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export CAAS from Romania.¹⁰⁰ The Commission received a usable questionnaire response from one firm: Alro S.A. ("Alro"). This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Romania in 2019. According to estimates requested of the responding Romanian producer (Alro), the production of CAAS in Romania reported in its questionnaire accounts for *** production of CAAS in Romania during 2019. Table VII-39 presents information on the CAAS operations of Alro in Romania.

Table VII-39
CAAS: Summary data for Romanian producer Alro, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Alro	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-40, Alro reported operational and organizational changes since January 1, 2017.

Table VII-40
CAAS: Romanian producer Alro's reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Revised labor agreements:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁰⁰ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-41 presents information on the CAAS operations of Romanian producer Alro. Alro's capacity and production both decreased irregularly during 2017-19, falling by *** percent and *** percent, respectively. Capacity was *** percent higher during interim 2020 than in interim 2019, while production was *** percent lower. Alro's capacity is projected to increase by *** percent from 2019 to 2020 and decrease by *** percent from 2020 to 2021, ending overall above 2019 levels. Alro's production of CAAS is projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021.

Alro's home market shipments increased by *** percent during 2017-19 and were *** percent lower in interim 2020 than in interim 2019. Home market shipments are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall below 2019 levels. Alro's export shipments of CAAS to the United States increased by *** percent during 2017-19 and were *** percent lower in interim 2020 compared with interim 2019.¹⁰¹ Export shipments to the United States are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall below 2019 levels. Export shipments to all other markets decreased by *** percent from 2017 to 2019 and were *** percent lower during interim 2020 compared with interim 2019. Alro's export shipments to all other markets are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall above 2019 levels. As a share of total shipments, exports to the United States increased by *** percentage points during 2017-19, while exports to all other markets decreased by *** percentage points. Other export markets identified by Alro included ***.¹⁰²

¹⁰¹ Alro reported ***. Email from ***, January 19, 2021.

¹⁰² Alro foreign producer questionnaire response, section II-8.

Table VII-41

CAAS: Data for Romanian producer Alro, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-42, Alro produced other products on the same equipment and machinery used to produce CAAS. These products included ***.¹⁰³ As a share of total production on the same equipment as in-scope production, Alro's production of *** accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-42

CAAS: Romanian producer Alro's overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁰³ Alro foreign producer questionnaire response, section II-3a.

Alro was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Alro reported ***.¹⁰⁴

Alro reported ***.¹⁰⁵

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Romania are Germany, the United States, and Turkey (table VII-43). During 2019, the United States was the second largest export market for those exports from Romania, accounting for 16.2 percent of exports by quantity, preceded by Germany, accounting for 16.6 percent, and followed by Turkey, accounting for 8.1 percent.

¹⁰⁴ Alro foreign producer questionnaire response, section II-3d.

¹⁰⁵ Alro foreign producer questionnaire response, section II-4a.

Table VII-43**Aluminum plates, sheets and strip: Exports from Romania by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	3,242	7,808	13,540
Germany	15,740	13,958	13,875
Turkey	7,386	6,563	6,740
Italy	7,324	6,525	5,980
France	7,125	6,785	5,745
Czech Republic	5,356	5,564	5,716
Poland	7,879	5,922	5,651
United Kingdom	4,906	4,566	4,300
Spain	5,847	5,040	3,839
All other destination markets	18,798	18,108	18,326
Total exports	83,603	80,839	83,713
	Share of quantity (percent)		
United States	3.9	9.7	16.2
Germany	18.8	17.3	16.6
Turkey	8.8	8.1	8.1
Italy	8.8	8.1	7.1
France	8.5	8.4	6.9
Czech Republic	6.4	6.9	6.8
Poland	9.4	7.3	6.8
United Kingdom	5.9	5.6	5.1
Spain	7.0	6.2	4.6
All other destination markets	22.5	22.4	21.9
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Serbia

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export CAAS from Serbia.¹⁰⁶ The Commission received a usable questionnaire response from one firm: Impol Seval Aluminium Rolling Mill ("Impol Seval"). This firm's exports to the United States were equivalent to *** U.S. imports of CAAS from Serbia in 2019. According to estimates requested of the responding Serbian producer (Impol Seval), the production of CAAS in Serbia reported in its questionnaire accounts for *** production of CAAS in Serbia during 2019. Table VII-44 presents information on the CAAS operations of Impol Seval in Serbia.

Table VII-44
CAAS: Summary data for Serbian producer Impol Seval, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Impol Seval	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-45, Impol Seval reported operational and organizational changes since January 1, 2017.

Table VII-45
CAAS: Serbian producer Impol Seval's reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁰⁶ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-46 presents information on the CAAS operations of Serbian producer Impol Seval. Impol Seval's capacity to produce CAAS fluctuated but decreased by *** percent from 2017 to 2019, was *** percent higher during interim 2020 than in interim 2019, and is projected to increase by *** percent from 2019 to 2020 and *** during 2021. During 2017-19, Impol Seval's CAAS production and capacity utilization increased irregularly by *** percent and *** percentage points, respectively. Production was *** percent lower during interim 2020 compared with interim 2019 and is projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall below 2019 levels. Impol Seval's capacity utilization was *** percentage points lower during interim 2020 than in interim 2019.

During 2017-19, home market shipments increased irregularly by *** percent and were *** percent lower during interim 2020 than in interim 2019. Home market shipments are projected to increase by *** percent from 2019 to 2020 and *** during 2021. Impol Seval's export shipments of CAAS to the United States increased *** and increased ***.¹⁰⁷ Export shipments to the United States were *** percent lower during interim 2020 than in interim 2019 and are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall below 2019 levels. As a share of Impol Seval's total shipments of CAAS, exports to all other markets accounted for *** during 2017-19 and *** during interim 2019 and interim 2020. Other export markets identified by Impol Seval included ***.¹⁰⁸

¹⁰⁷ Impol Seval attributed the increased exports to the United States to ***. Moreover, Impol Seval reported ***. Impol Seval foreign producer questionnaire, section II-11.

¹⁰⁸ Impol Seval foreign producer questionnaire response, section II-8.

Table VII-46

CAAS: Data for Serbian producer Impol Seval, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-47, Impol Seval produced other products on the same equipment and machinery used to produce CAAS. These products included ***.¹⁰⁹ As a share of overall production on the same equipment as in-scope production, CAAS accounted for *** of Impol Seval's production during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-47

CAAS: Serbian producer Impol Seval's overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁰⁹ Impol Seval foreign producer questionnaire response, section II-3a.

Impol Seval was asked about constraints on production capacity and the ability to switch between CAAS and other products. Impol Seval reported ***.¹¹⁰

Impol Seval reported ***. However, Impol Seval reported ***.¹¹¹

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Serbia are Slovenia, Germany, and (as of 2019) the United States (table VII-48). During 2019, the United States was the third largest export market for those exports from Serbia, accounting for 7.0 percent of exports by quantity, preceded by Slovenia and Germany, accounting for 59.9 percent and 12.4 percent, respectively.

¹¹⁰ Impol Seval foreign producer questionnaire response, section II-3d.

¹¹¹ Impol Seval foreign producer questionnaire response, section II-4a and II-4b.

Table VII-48**Aluminum plates, sheets and strip: Exports from Serbia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	---	74	3,807
Slovenia	22,109	33,715	32,713
Germany	8,505	9,297	6,787
Russia	7,685	3,493	2,677
Poland	1,729	2,133	1,674
Italy	1,521	1,292	1,259
Netherlands	984	1,300	1,126
Belarus	723	672	568
Switzerland	539	627	529
All other destination markets	5,299	4,118	3,474
Total exports	49,094	56,720	54,615
	Share of quantity (percent)		
United States	---	0.1	7.0
Slovenia	45.0	59.4	59.9
Germany	17.3	16.4	12.4
Russia	15.7	6.2	4.9
Poland	3.5	3.8	3.1
Italy	3.1	2.3	2.3
Netherlands	2.0	2.3	2.1
Belarus	1.5	1.2	1.0
Switzerland	1.1	1.1	1.0
All other destination markets	10.8	7.3	6.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics of imports from Serbia (constructed export statistics for Serbia) under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Slovenia

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Slovenia.¹¹² The Commission received a usable questionnaire response from one firm: Impol d.o.o. This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Slovenia in 2019. According to estimates requested of the responding Slovenian producer (Impol d.o.o.), the production of CAAS in Slovenia reported in its questionnaire accounts for *** production of CAAS in Slovenia during 2019. Table VII-49 presents information on the CAAS operations of Impol d.o.o. in Slovenia

Table VII-49
CAAS: Summary data for Slovenian producer Impol d.o.o., 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Impol d.o.o.	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-50, Impol d.o.o. reported operational and organizational changes since January 1, 2017.

Table VII-50
CAAS: Slovenian producer Impol d.o.o.'s reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

¹¹² These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-51 presents information on the CAAS operations of Slovenian producer Impol d.o.o. Capacity to produce CAAS increased by *** percent during 2017-19 and was *** percent higher during interim 2020 compared with interim 2019. Impol d.o.o.'s capacity is projected to increase by *** percent from 2019 to 2020 and *** during 2021. Similarly, production increased by *** percent during 2017-19 and was *** percent higher in interim 2020 than in interim 2019. Impol d.o.o.'s production of CAAS is projected to increase by *** percent from 2019 to 2020 and *** during 2021. The increases in capacity in production during 2017-19 are consistent with Impol d.o.o.'s reported ***.¹¹³ From 2017 to 2019, Impol d.o.o.'s capacity utilization increased by *** percentage points.

Impol d.o.o.'s home market shipments increased irregularly by *** percent during 2017-19, were *** percent higher in interim 2020 than in interim 2019, and are projected to increase from 2019 to 2020 and *** during 2021. Export shipments of CAAS to the United States increased *** and decreased ***.¹¹⁴ Export shipments to all other markets increased irregularly by *** percent during 2017-19. Impol d.o.o.'s exports to the United States were *** percent lower during interim 2020 than in interim 2019, while exports to all other markets were *** percent higher. Export shipments to the United States are projected to increase by *** percent from 2019 to 2020 and *** during 2021. Similarly, export shipments to all other export markets are projected to increase by *** percent from 2019 to 2020 and *** during 2021. As a share of total shipments, Impol d.o.o.'s exports to the United States increased by *** percentage points from 2017 to 2019, while exports to all other markets decreased by *** percentage points during the same period. Other export markets identified by Impol d.o.o. included ***.¹¹⁵

¹¹³ Impol d.o.o. foreign producer questionnaire response, section II-2a.

¹¹⁴ Impol d.o.o. attributed the increased exports to the United States to ***. Moreover, Impol d.o.o. reported ***. Impol d.o.o. foreign producer questionnaire, section II-11.

¹¹⁵ Impol d.o.o. foreign producer questionnaire response, section II-8.

Table VII-51

CAAS: Data for Slovenian producer Impol d.o.o., 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-52, Impol d.o.o. produced other products on the same equipment and machinery used to produce CAAS. These products included ***.¹¹⁶ As a share of total production on the same equipment as in-scope production, Impol d.o.o.'s production of CAAS accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-52

CAAS: Slovenian producer Impol d.o.o.'s overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹¹⁶ Impol d.o.o. foreign producer questionnaire response, section II-3a.

Impol d.o.o. was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Impol d.o.o. reported ***.¹¹⁷

Impol d.o.o. reported ***.¹¹⁸

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Slovenia are Germany, Italy, and the Czech Republic (table VII-53). During 2019, the United States was the fifth largest export market for those exports from Slovenia, accounting for 5.1 percent of exports by quantity, preceded by Germany, Italy, the Czech Republic, and France, accounting for 21.5 percent, 15.7 percent, 10.9 percent, and 8.1 percent, respectively.

¹¹⁷ Impol d.o.o. foreign producer questionnaire response, section II-3d.

¹¹⁸ Impol d.o.o. foreign producer questionnaire response, section II-4a and II-4b.

Table VII-53**Aluminum plates, sheets and strip: Exports from Slovenia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	32	7,399	5,092
Germany	12,282	16,995	21,548
Italy	10,438	13,189	15,760
Czech Republic	2,267	6,959	10,915
France	2,698	5,588	8,160
Slovakia	251	2,155	4,890
Austria	2,058	2,877	4,017
Spain	2,267	2,431	3,885
United Kingdom	290	1,029	3,823
All other destination markets	11,174	14,715	22,186
Total exports	43,757	73,335	100,276
	Share of quantity (percent)		
United States	0.1	10.1	5.1
Germany	28.1	23.2	21.5
Italy	23.9	18.0	15.7
Czech Republic	5.2	9.5	10.9
France	6.2	7.6	8.1
Slovakia	0.6	2.9	4.9
Austria	4.7	3.9	4.0
Spain	5.2	3.3	3.9
United Kingdom	0.7	1.4	3.8
All other destination markets	25.5	20.1	22.1
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in South Africa

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from South Africa.¹¹⁹ The Commission received a usable questionnaire response from one firm: Hulamin Operations Proprietary Limited ("Hulamin"). This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from South Africa in 2019. According to estimates requested of the responding South African producer (Hulamin), its production of CAAS in South Africa reported in its questionnaire response accounts for *** production of CAAS in South Africa during 2019. Table VII-54 presents information on the CAAS operations of Hulamin in South Africa.

Table VII-54
CAAS: Summary data for South African producer Hulamin, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Hulamin	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-55, Hulamin reported several operational and organizational changes since January 1, 2017.

¹¹⁹ This firm was identified through a review of information submitted in the petition and contained in *** records.

Table VII-55

CAAS: South African producer Hulamin’s reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Acquisitions:	
***	***
Prolonged shutdowns or curtailments:	
***	***
Other:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CAAS

Table VII-56 presents information on the CAAS operations of South African producer Hulamin. Hulamin’s capacity to produce CAAS *** during 2017-19 and is projected to *** during 2020 and 2021. Production fluctuated but decreased by *** percent from 2017 to 2019 and was *** percent lower during interim 2020 than in interim 2019. Hulamin’s production of CAAS is projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall below 2019 levels. Capacity utilization decreased by *** percentage points from 2017 to 2019, was *** percentage points lower during interim 2020 than in interim 2019, and is projected to decrease overall by *** percentage points between 2019 and 2021.

Hulamin's home market shipments fluctuated but decreased by *** percent from 2017 to 2019 and was *** percent lower during interim 2020 than in interim 2019. Home market shipments are projected to decrease overall by *** percent between 2019 and 2021. During 2017-19, Hulamin's export shipments to the United States fluctuated but increased by *** percent, while its export shipments to all other markets fluctuated but decreased by *** percent. Export shipments to the United States were *** percent lower during interim 2020 than in interim 2019 and are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall *** below 2019 levels. Export shipments to all other markets were *** percent higher in interim 2020 than in interim 2019 and are projected to fluctuate but increase overall by *** percent between 2019 and 2021. As a share of total shipments, home market shipments and exports to all other markets fluctuated but decreased by *** percentage points and *** percentage points, respectively, during 2017-19, while export shipments to the United States fluctuated but increased by *** percentage points during the same period. Other export markets identified by Hulamin included ***.¹²⁰

¹²⁰ Hulamin foreign producer questionnaire response, section II-8.

Table VII-56

CAAS: Data for South Africa producer Hulamín, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-57, Hulamin produced other products on the same equipment and machinery used to produce CAAS. These products included ***.¹²¹ As a share of total production on the same equipment as in-scope production, *** accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-57

CAAS: South African producer Hulamin's overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹²¹ Hulamin foreign producer questionnaire response, section II-3a.

Hulamin was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Hulamin reported *** and ***.¹²²

Hulamin reported ***. Hulamin further reported that its ability to shift production capacity between CAAS and other products is ***.¹²³

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from South Africa are the United States, Belgium, and the United Kingdom (table VII-58). During 2019, the United States was the top export market for those exports from South Africa, accounting for 42.9 percent of exports by quantity, followed by Belgium and the United Kingdom, accounting for 12.3 percent and 11.3 percent, respectively.

¹²² Hulamin foreign producer questionnaire response, section II-3d.

¹²³ Hulamin foreign producer questionnaire response, sections II-4a and II-4b.

Table VII-58**Aluminum plates, sheets and strip: Exports from South Africa by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	55,302	79,802	60,007
Belgium	20,298	18,335	17,252
United Kingdom	6,354	9,276	15,833
Germany	11,506	10,394	8,631
Brazil	4,258	5,886	8,363
Australia	6,030	5,862	5,522
France	1,850	2,361	5,092
Ireland	154	352	3,227
Poland	1,737	4,346	2,941
All other destination markets	38,666	29,510	13,104
Total exports	146,154	166,124	139,972
	Share of quantity (percent)		
United States	37.8	48.0	42.9
Belgium	13.9	11.0	12.3
United Kingdom	4.3	5.6	11.3
Germany	7.9	6.3	6.2
Brazil	2.9	3.5	6.0
Australia	4.1	3.5	3.9
France	1.3	1.4	3.6
Ireland	0.1	0.2	2.3
Poland	1.2	2.6	2.1
All other destination markets	26.5	17.8	9.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by South African Revenue Service in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Spain

The Commission issued foreign producers' or exporters' questionnaires to 16 firms believed to produce and/or export CAAS from Spain.¹²⁴ Usable responses to the Commission's questionnaire were received from three firms: Aludium Transformacion de Productos S.L. ("Aludium"), Compañía Valenciana de Aluminio Baux S.L.U. ("Compania Valenciana"), and José María Ucín S.A.U. ("Jose Maria"). These firms' exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Spain in 2019. According to estimates requested of the responding Spanish producers, the production of CAAS in Spain reported in questionnaires accounts for approximately *** percent of overall production of CAAS in Spain during 2019.

Jose Maria, also known as "UCIN Alumino" produces 30,000 metric tons (or 33,069 short tons) of aluminum products per year. Eighty percent of this product is exported and 90 percent is made from recycled aluminum.¹²⁵ The firm's aluminum sheet factory is located in Usúrbil, Spain.¹²⁶ The company's products are available in 1XXX, 3XXX, 5XXX, and 8XXX series alloys and are produced with thicknesses ranging between 0.25 mm and 2.5 mm.¹²⁷

Compania Valenciana is the aluminum manufacturing branch of the Baux Group which also includes an aluminum coating business, Bancolor. In December 2018, Baux Group was acquired by Jupiter Aluminum Corporation, headquartered in the United States. Compania Valenciana's production facility is located in Segorbe, Castellón, Spain. The factory uses 100 percent scrap metal as its raw material and a twin-belt casting process to produce almost 50,000 metric tons of aluminum coil annually. The factory has a production capacity of 70,000 metric tons. The company currently exports to twelve countries.¹²⁸

¹²⁴ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹²⁵ José María Ucín Sau, "Home – Manufacturer of Rolled Aluminum Since 1967," <https://www.ucinaluminio.com/en/>, retrieved January 13, 2021.

¹²⁶ José María Ucín Sau, "Aluminium Sheets," <https://www.ucinaluminio.com/en/products/aluminium-sheets/>, retrieved January 13, 2021.

¹²⁷ Ibid.

¹²⁸ Baux, "Home," <https://baux.es/en/>, retrieved January 13, 2021.

Many Spanish firms within the industry appear to focus on more downstream production including aluminum coating, coloring, and surface treatment – such as Alucoat,¹²⁹ and Aluminios Andalucia,¹³⁰ or the manufacturing of packaging products such as those made by Constania Topebal Logrono.¹³¹

Table VII-59 presents information on the CAAS operations of the responding producers and exporters in Spain.

Table VII-59
CAAS: Summary data for producers in Spain, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Aludium	***	***	***	***	***	***
Compania Valenciana	***	***	***	***	***	***
Jose Maria	***	***	***	***	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-60, producers in Spain reported several operational and organizational changes since January 1, 2017.

¹²⁹ Alucoat, “Home,” <https://www.alucoat-conversion.com/>, retrieved January 13, 2021.

¹³⁰ Aluminios Andalucia, “Home,” <http://grupoandalucia.es/?lang=en#>, retrieved January 13, 2021.

¹³¹ Constania Topebal Logrono, “Who We Are,” <https://www.cflex.com/locations/constantia-tobepal-logrono-spain>, retrieved January 13, 2021.

Table VII-60

CAAS: Spanish producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Expansions:	
***	***
Acquisitions:	
***	***
Prolonged shutdowns or curtailments:	
***	***
Revised labor agreements:	
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CAAS

Table VII-61 presents information on the CAAS operations of the responding producers and exporters in Spain. Spanish producers' capacity to produce CAAS *** during 2017-19 and was *** percent lower during interim 2020 than in interim 2019. Production increased by *** percent from 2017 to 2019 and was *** percent lower during interim 2020 than in interim 2019. Spanish producers' capacity is projected to *** from 2019 to 2020 and increase by *** percent from 2020 to 2021, while production is projected to decrease by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021, ending overall above 2019 levels. Capacity utilization increased by *** percentage points during 2017-19 and was *** percentage points lower during interim 2020 than in interim 2019.

Spanish producers' home market shipments fluctuated but increased by *** percent during 2017-19 and were *** percent lower during interim 2020 than in interim 2019. Home market shipments are projected to increase overall by *** percent between 2019 and 2021. *** did not report any exports of CAAS to the United States during 2017 and 2018, while *** did not report any during 2017. Export shipments to the United States increased *** and ***. Export shipments to the United States were *** percent lower during interim 2020 than in interim 2019 and are projected to increase by *** percent from 2019 to 2020 and decrease by *** percent from 2020 to 2021, ending overall below 2019 levels. Spanish producers' export shipments of CAAS to all other markets increased by *** percent during 2017-19 and were *** percent lower during interim 2020 than in interim 2019. Export shipments to all other markets are projected to decrease by *** percent from 2019 to 2020 and increase by *** percent, ending overall *** 2019 levels. Other export markets identified by responding Spanish producers included ***.¹³²

¹³² *** foreign producer questionnaire responses, section II-8.

Table VII-61

CAAS: Data for producers in Spain, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-62, *** of three responding Spanish firms (***) produced other products on the same equipment and machinery used to produce CAAS.¹³³ Other products included ***.¹³⁴ As a share of total production on the same equipment as in-scope production, CAAS accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Spanish firms were asked about constraints on production capacity and the ability to switch production between CAAS and other products. *** reported that its capacity is constrained by ***, while *** reported that its capacity is constrained by ***.¹³⁵ *** reported that its capacity is constrained by ***.¹³⁶

*** reported being ***.¹³⁷ *** further reported ***.¹³⁸ *** reported being ***.¹³⁹

¹³³ *** did not report any production of other products on the same equipment and machinery used to produce CAAS. *** foreign producer questionnaire responses, section II-3a.

¹³⁴ *** foreign producer questionnaire response, section II-3a.

¹³⁵ *** foreign producer questionnaire responses, section II-3d.

¹³⁶ *** foreign producer questionnaire response, section II-3d.

¹³⁷ *** foreign producer questionnaire response, section II-4a.

¹³⁸ *** foreign producer questionnaire response, section II-4b.

¹³⁹ *** foreign producer questionnaire responses, sections II-4a and II-4b.

Table VII-62

CAAS: Spanish producers' overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Spain are Germany, Italy, and the Netherlands (table VII-63). During 2019, the United States was the fourth largest export market for those exports from Spain, accounting for 7.4 percent of exports by quantity, preceded by Germany, Italy, and the Netherlands, accounting for 23.5 percent, 7.9 percent, and 7.5 percent, respectively.

Table VII-63**Aluminum plates, sheets and strip: Exports from Spain by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	1,679	6,115	20,781
Germany	75,791	83,679	66,262
Italy	19,780	19,132	22,297
Netherlands	19,937	20,432	21,148
United Kingdom	21,277	21,983	12,426
Portugal	9,311	9,526	11,365
Switzerland	12,936	8,004	8,451
Algeria	2,159	2,439	3,403
Morocco	4,128	4,839	3,117
All other destination markets	108,678	109,270	112,717
Total exports	275,676	285,419	281,967
	Share of quantity (percent)		
United States	0.6	2.1	7.4
Germany	27.5	29.3	23.5
Italy	7.2	6.7	7.9
Netherlands	7.2	7.2	7.5
United Kingdom	7.7	7.7	4.4
Portugal	3.4	3.3	4.0
Switzerland	4.7	2.8	3.0
Algeria	0.8	0.9	1.2
Morocco	1.5	1.7	1.1
All other destination markets	39.4	38.3	40.0
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Taiwan

The Commission issued foreign producers' or exporters' questionnaires to 12 firms believed to produce and/or export CAAS from Taiwan.¹⁴⁰ The Commission received a usable questionnaire response from one firm: C.S. Aluminium Corporation ("C.S. Aluminium"). This firm's exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Taiwan in 2019. According to estimates requested of the responding producer in Taiwan (C.S. Aluminium), the production of CAAS in Taiwan reported in questionnaires accounts for approximately *** percent of overall production of CAAS in Taiwan during 2019. Table VII-64 presents information on the CAAS operations of C.S. Aluminium in Taiwan.

Table VII-64
CAAS: Summary data for producer C.S. Aluminium in Taiwan, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
C. S. Aluminium	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

C.S. Aluminium reported *** since January 1, 2017.

¹⁴⁰ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-65 presents information on the CAAS operations of C.S. Aluminium. During 2017-19, C.S. Aluminium's capacity to produce CAAS ***, while its production of CAAS increased by *** percent. Capacity *** during interim 2020 *** interim 2019. C.S. Aluminium's production was *** percent lower during interim 2020 than in interim 2019 and is projected to decrease by *** percent from 2019 to 2020 and *** during 2021. Capacity utilization increased by *** percentage points during 2017-19 and was *** percentage points lower during interim 2020 than in interim 2019.

C.S. Aluminium's home market shipments decreased by *** percent during 2017-19 and were *** percent higher during interim 2020 than in interim 2019. C.S. Aluminium projects that its home market shipments will increase by *** percent from 2019 to 2020 and *** during 2021. Export shipments of CAAS to the United States increased *** and ***. C.S. Aluminium's exports to the United States were *** percent lower during interim 2020 than in interim 2019. Export shipments to the United States are projected to decrease by *** percent between 2019 and 2020 and *** during 2021. Export shipments to all other markets decreased by *** percent during 2017-19 and are projected to increase by *** percent between 2019 and 2021. Other export markets identified by C.S. Aluminium included ***.¹⁴¹

¹⁴¹ C.S. Aluminium foreign producer questionnaire response, section II-8.

Table VII-65

CAAS: Data for producer C.S. Aluminium in Taiwan, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-66, C.S. Aluminium produced other products on the same equipment and machinery used to produce CAAS. These other products included ***,¹⁴² CAAS *** of C.S. Aluminium's total production on the same equipment as in-scope production during the period for which data were collected.

Table VII-66

CAAS: Producer C.S. Aluminium's overall capacity and production on the same equipment as in-scope production in Taiwan, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁴² C.S. Aluminium foreign producer questionnaire response, section II-3a.

C.S. Aluminium was asked about constraints on production capacity and the ability to switch production between CAAS and other products. C.S. Aluminium reported ***.¹⁴³

Regarding its ability to switch production between CAAS and other products using the same equipment and/or labor, C.S. Aluminium reported ***. Moreover, C.S. Aluminium reported ***. C.S. Aluminium further reported ***.¹⁴⁴

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Taiwan are the United States, China, and Japan (table VII-67). During 2019, the United States was the top export market for those exports from Taiwan, accounting for 53.5 percent of exports by quantity, followed by China and Japan, accounting for 19.5 percent and 10.5 percent, respectively.

¹⁴³ C.S. Aluminium foreign producer questionnaire response, section II-3d.

¹⁴⁴ C.S. Aluminium foreign producer questionnaire response, sections II-4a and II-4b.

Table VII-67**Aluminum plates, sheets and strip: Exports from Taiwan by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	670	44,744	57,837
China	37,291	21,257	21,063
Japan	8,432	8,691	11,364
Thailand	9,208	9,627	5,866
Vietnam	5,407	4,320	2,495
Malaysia	2,599	3,184	2,382
Hong Kong	5,316	5,660	2,110
Singapore	785	1,274	1,415
Korea	1,636	1,585	1,018
All other destination markets	3,858	2,825	2,631
Total exports	75,202	103,166	108,181
	Share of quantity (percent)		
United States	0.9	43.4	53.5
China	49.6	20.6	19.5
Japan	11.2	8.4	10.5
Thailand	12.2	9.3	5.4
Vietnam	7.2	4.2	2.3
Malaysia	3.5	3.1	2.2
Hong Kong	7.1	5.5	2.0
Singapore	1.0	1.2	1.3
Korea	2.2	1.5	0.9
All other destination markets	5.1	2.7	2.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Turkey

The Commission issued foreign producers' or exporters' questionnaires to 21 firms believed to produce and/or export CAAS from Turkey.¹⁴⁵ Usable responses to the Commission's questionnaire were received from five firms: ASAŞ Alüminyum Sanayi ve Ticaret A.Ş. ("ASAS"), Teknik Alüminyum San A.S. ("Teknik"), Assan Alüminyum Sanayi ve Ticaret A.Ş. ("Assan"), Almesan Alüminyum San VE TIC A.S. ("Almesan"), and VIG Metal San. TIC. A.S. ("VIG Metal"). These firms' exports to the United States were equivalent to approximately *** percent of U.S. imports of CAAS from Turkey in 2019. According to estimates requested of the responding Turkish producers, the production of CAAS in Turkey reported in questionnaires accounts for *** production of CAAS in Turkey during 2019. However, staff believes that this estimated figure is overstated, based on industry research that has identified at least one additional firm producing CAAS in Turkey: AK Alüminyum Sanyı ve Ticaret AS, ("AK Alüminyum").

AK Alüminyum produces flat-rolled and embossed aluminum coil and sheet in a variety of thicknesses ranging between 0.2 mm and 8.0 mm, and 1XXX and 3XXX alloys.¹⁴⁶ AK Alüminyum's production facility, located in Konya Turkey,¹⁴⁷ consists of two casting lines, with a combined capacity of 41 metric tons (45.19 short tons), and a cold rolling mill, with two furnaces having a total annealing capacity of 60 metric tons (66.14 short tons).¹⁴⁸ The company's total production capacity is 50,000 metric tons (55,116 short tons) per year, split evenly between coil and cold-rolled finished products.¹⁴⁹

Table VII-68 presents information on the CAAS operations of the responding producers and exporters in Turkey.

¹⁴⁵ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹⁴⁶ AK Alüminyum, "Products," <http://www.akaluminum.com.tr/#cid=404180794&cap=Products>, retrieved January 13, 2021.

¹⁴⁷ AK Alüminyum, "Contact," <http://www.akaluminum.com.tr/#cid=404180740&cap=Contact>, retrieved January 13, 2021.

¹⁴⁸ AK Alüminyum, "Production," <http://www.akaluminum.com.tr/#cid=404465010&cap=Production>, retrieved January 13, 2021.

¹⁴⁹ AK Alüminyum, "Our Company," <http://www.akaluminum.com.tr/#Kurumsal>, retrieved January 13, 2021.

Table VII-68
CAAS: Summary data for producers in Turkey, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Almesan	***	***	***	***	***	***
VIG Metal	***	***	***	***	***	***
ASAS	***	***	***	***	***	***
Assan	***	***	***	***	***	***
Teknik	***	***	***	***	***	***
Total	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-69, producers in Turkey reported several operational and organizational changes since January 1, 2017.

Table VII-69
CAAS: Turkish producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Expansions:	
***	***
***	***
Acquisitions:	
***	***
Prolonged shutdowns or curtailments:	
***	***
Revised labor agreements:	
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CAAS

Table VII-70 presents information on the CAAS operations of the responding producers and exporters in Turkey. Turkish producers' capacity to produce CAAS increased by *** percent during 2017-19 and was *** during interim 2020 *** interim 2019. Capacity is projected to *** during 2020 and 2021. Production of CAAS increased by *** percent during 2017-19 and was *** percent lower during interim 2020 than in interim 2019. Turkish producers' production of CAAS is projected to increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021. Capacity utilization increased by *** percentage points from 2017 to 2019.

Turkish producers' total home market shipments fluctuated but decreased by *** percent during 2017-19 and were *** percent lower during interim 2020 than in interim 2019. Export shipments to the United States increased by *** percent during 2017-19, while export shipments to all other markets fluctuated but increased by *** percent during the same period. Export shipments to the United States and exports to all other markets were *** percent and *** percent lower during interim 2020 than in interim 2019. Turkish producers' export shipments to the United States are projected to fluctuate but increase overall by *** percent between 2019 and 2021, while export shipments to all other markets are projected to increase by *** percent overall during the same period. Export shipments to the United States as a share of total shipments increased by *** percentage points during 2017-19, while total home market shipments as a share of total shipments decreased by *** percentage points and export shipments to other markets as a share of total shipments fluctuated but decreased by *** percentage points. Other export markets identified by Turkish producers included ***.¹⁵⁰

¹⁵⁰ *** foreign producer questionnaire responses, section II-8.

Table VII-70

CAAS: Data for producers and exporters in Turkey, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table VII-71, responding Turkish firms produced other products on the same equipment and machinery used to produce CAAS. These products included ***.¹⁵¹ As a share of total production on the same equipment as in-scope production, CAAS accounted for *** during 2017-19 and *** during interim 2019 and interim 2020.

Table VII-71

CAAS: Turkish producers' overall capacity and production on the same equipment as in-scope production, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Overall capacity	***	***	***	***	***
Production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: CAAS	***	***	***	***	***
Can stock	***	***	***	***	***
Non-common alloy sheet	***	***	***	***	***
Foil, all alloys	***	***	***	***	***
Plate, all alloys	***	***	***	***	***
Other products	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁵¹ *** foreign producer questionnaire responses, section II-3a.

Firms were asked about their constraints on production capacity and the ability to switch production between CAAS to other products. Almesan reported ***, while ASAS reported ***.¹⁵² Assan reported ***.¹⁵³ Teknik reported ***.¹⁵⁴ VIG Metal reported ***.¹⁵⁵

*** responding Turkish producers (***) reported *** to shift production between CAAS and other products using the same equipment and labor.¹⁵⁶ *** reported being able to switch production ***.¹⁵⁷ *** reported being able to switch between ***, while *** reported being able to switch production between ***.¹⁵⁸

Exports

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Turkey are the United States, Germany, and the United Kingdom (table VII-72). During 2019, the United States was the top export market for those exports from Turkey, accounting for 16.9 percent of exports by quantity, followed by Germany and the United Kingdom, accounting for 14.3 percent and 11.3 percent, respectively.

¹⁵² ASAS and Almesan foreign producer questionnaire responses, section II-3d.

¹⁵³ Assan foreign producer questionnaire response, section II-3d.

¹⁵⁴ Teknik foreign producer questionnaire response, section II-3d.

¹⁵⁵ VIG Metal foreign producer questionnaire response, section II-3d.

¹⁵⁶ *** foreign producer questionnaire responses, section II-4a.

¹⁵⁷ *** foreign producer questionnaire response, sections II-4a and II-4b.

¹⁵⁸ *** foreign producer questionnaire responses, sections II-4a and II-4b.

Table VII-72**Aluminum plates, sheets and strip: Exports from Turkey by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	5,939	34,164	45,052
Germany	37,297	33,882	38,002
United Kingdom	24,861	26,754	30,220
Switzerland	23,714	18,448	21,180
Italy	13,528	15,356	19,074
Spain	14,146	16,997	17,641
Poland	10,359	10,396	14,736
Austria	12,194	10,199	13,153
Korea	11,423	12,771	12,524
All other destination markets	49,169	51,249	54,865
Total exports	202,631	230,216	266,446
	Share of quantity (percent)		
United States	2.9	14.8	16.9
Germany	18.4	14.7	14.3
United Kingdom	12.3	11.6	11.3
Switzerland	11.7	8.0	7.9
Italy	6.7	6.7	7.2
Spain	7.0	7.4	6.6
Poland	5.1	4.5	5.5
Austria	6.0	4.4	4.9
Korea	5.6	5.5	4.7
All other destination markets	24.3	22.3	20.6
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by State Institute of Statistics in the Global Trade Atlas database, accessed December 22, 2020.

Subject countries combined

Table VII-73 presents summary data on CAAS operations of the reporting subject producers in the subject countries. Subject producers' combined capacity to produce CAAS fluctuated but increased by *** percent during 2017-19, while combined CAAS production increased by *** percent during the same period. Subject producers' combined capacity and production were *** percent and *** percent lower, respectively, during interim 2020 than in interim 2019. Combined subject producers' capacity utilization fluctuated but increased by *** percentage points between 2017 and 2019 and was *** percentage points lower during interim 2020 than in interim 2019. Combined subject producers' capacity and production are both projected to fluctuate but decrease by *** percent and *** percent between 2019 and 2021, respectively.

Combined subject producers' exports of CAAS to the United States increased by *** percent during 2017-19, while total home market shipments and exports to all other markets decreased by *** percent and *** percent, respectively, during the same period. Combined subject producers' exports to the United States, total home market shipments, and exports to all other markets were all lower during interim 2020 than in interim 2019. Exports to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021. Combined subject producers' exports to all other markets are projected to fluctuate but decrease overall by *** percent between 2019 and 2021, while total home market shipments are projected to fluctuate but increase by *** percent. Export shipments to the United States as a share of combined subject producers' total shipments increased by *** percentage points during 2017-19, while export shipments to all other markets as a share of combined subject producers' total shipments decreased by *** percentage points.

Table VII-73

CAAS: Data on the industry in subject countries, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table VII-73—Continued

CAAS: Data on the industry in subject countries, 2017-19, January-September 2019, January-September 2020, and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (short tons)						
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Share of total exports to the United States: Exported by producers	***	***	***	***	***	***	***
Exported by resellers	***	***	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. inventories of imported merchandise

Table VII-74 presents data on U.S. importers' reported inventories of CAAS. Inventories of CAAS imports from subject countries increased by *** percent between 2017 and 2019, while inventories of CAAS imports from nonsubject countries decreased by *** percent during the same period. U.S. importer *** reported inventories accounted for the majority of inventories of CAAS from all import sources during the period for which data were collected. *** inventories of CAAS from all import sources increased *** and ***, for an overall increase of *** percent during 2017-19. Inventories of CAAS imports from subject countries and nonsubject countries were *** percent and *** percent lower, respectively, during interim 2020 than in interim 2019. The ratio of U.S. importers' subject inventories to U.S. shipments of imports increased from *** percent in 2017 to *** percent in 2018 and to *** percent in 2019. The ratio of U.S. importers' subject inventories to U.S. shipments of imports was *** percentage points higher during interim 2020 than in interim 2019.

Table VII-74

CAAS: U.S. importers' end-of-period inventories by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Inventories (short tons); Ratios (percent)				
Imports from Bahrain Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Brazil: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Croatia: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Egypt: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Germany: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from India: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***

Table continued on next page.

Table VII-74—Continued

CAAS: U.S. importers' end-of-period inventories by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Inventories (short tons); Ratios (percent)				
Imports from Indonesia: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Italy: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Oman: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Romania: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Serbia: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Slovenia: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***

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Table VII-74—Continued

CAAS: U.S. importers' end-of-period inventories by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Inventories (short tons); Ratios (percent)				
Imports from South Africa: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Spain: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Taiwan: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Turkey: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from subject sources: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Canada: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***

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Table VII-74—Continued

CAAS: U.S. importers' end-of-period inventories by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Inventories (short tons); Ratios (percent)				
Imports from Greece: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Italy, nonsubject: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Korea: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from all other sources: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from nonsubject sources: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from all import sources: Inventories	155,001	215,138	269,083	282,503	195,546
Ratio to U.S. imports	24.9	31.2	36.4	34.4	57.5
Ratio to U.S. shipments of imports	26.4	34.3	39.4	39.2	43.1
Ratio to total shipments of imports	26.4	34.2	39.2	39.0	42.9

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Note: ***.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of CAAS after September 30, 2020. These data are presented in table VII-75. Responding importers of CAAS reported that *** percent of arranged imports are from subject sources.

Table VII-75
CAAS: Arranged imports, October 2020 through September 2021

Item	Period				Total
	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sep 2021	
	Quantity (short tons)				
Arranged U.S. imports from.--					
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy, subject	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Canada	***	***	***	***	***
Greece	***	***	***	***	***
Italy, nonsubject	***	***	***	***	***
Korea	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	55,260	85,302	41,058	29,791	211,411

Source: Compiled from data submitted in response to Commission questionnaires.

Antidumping or countervailing duty orders in third-country markets

While petitioners and certain respondents noted that no third countries have active antidumping and countervailing duty orders on the subject countries in these investigations, third countries have issued antidumping duty orders on certain flat-rolled aluminum products, including CAAS, from nonsubject countries such as China and Azerbaijan.¹⁵⁹ According to the World Trade Organization's Antidumping Gateway database, members of the Eurasian Economic Union (including Armenia, Kazakhstan, Kyrgyzstan, and Russia) have issued antidumping duty orders on imports of flat-rolled aluminum products (classified under HS subheadings 7606.11 and 7606.12) from Azerbaijan and China.¹⁶⁰ In addition, Argentina has active antidumping orders in place on imports of aluminum sheet imported under HS subheadings 7606.91 and 7606.92 from China.¹⁶¹

Information on nonsubject countries

Data on global exports of aluminum plate, sheet and strip (of a thickness exceeding 0.2mm) are presented in table VII-76. According to GTA, China, Germany, and the United States were the leading exporters of aluminum plate, sheet and strip. During 2019, China accounted for 25.3 percent of global exports. Germany and the United States accounted for 16.2 percent and 6.6 percent of global exports, respectively.

¹⁵⁹ Alro's postconference brief, Exhibit A, p. 4; HARP's postconference brief, Attachment 8, p. 2; Hulamin's postconference brief, Exhibit 1, p. 4; Petitioners' postconference brief, Exhibit 1, p. 16.

¹⁶⁰ Belarus is also a member of the Eurasian Economic Union, however it is not a member of the WTO. World Trade Organization, "Members and Observers," https://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm, retrieved April 2, 2020.

¹⁶¹ Individual WTO members submit quarterly notification reports which are available at the following link: https://www.wto.org/english/tratop_e/adp_e/adp_e.htm.

Table VII-76
Aluminum plates, sheets, and strip: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	859,545,023	826,780,342	677,996,234
Bahrain	108,503,397	113,730,712	101,845,723
Brazil	87,468,605	77,408,308	78,691,322
Croatia	59,710,494	64,022,581	85,261,708
Egypt	56,350,542	68,431,912	71,875,563
Germany	1,571,655,499	1,594,878,739	1,670,162,413
Greece	202,200,768	217,115,378	214,147,503
India	85,747,135	85,387,024	86,120,569
Indonesia	75,048,769	83,797,026	45,116,487
Italy	302,372,096	327,751,517	353,356,320
Korea	501,824,289	551,914,916	618,064,927
Oman	34,372,733	141,970,315	---
Romania	75,843,202	73,336,139	75,942,910
Serbia	44,537,408	51,456,030	49,545,622
Slovenia	39,695,316	66,528,046	90,968,956
South Africa	132,589,103	150,704,987	126,980,501
Spain	250,089,403	258,928,052	255,796,542
Taiwan	68,222,263	93,590,923	98,140,105
Turkey	183,824,286	208,848,703	241,716,105
China	2,076,100,966	2,794,763,384	2,616,226,309
France	473,098,248	477,757,799	486,529,410
Switzerland	306,101,820	289,222,092	285,885,958
Belgium	271,974,602	295,487,107	266,401,172
Austria	194,938,105	198,930,226	184,037,794
Japan	209,330,696	195,596,581	179,902,131
United Kingdom	167,845,521	184,089,035	166,265,599
Norway	153,177,421	148,385,463	152,098,105
All other exporters	1,113,102,287	1,187,190,147	1,335,183,647
All reporting exporters	9,705,269,997	10,828,003,484	10,614,259,635

Table continued on next page.

Table VII-76—Continued

Aluminum plates, sheets, and strip: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Share of quantity (percent)		
United States	8.9	7.6	6.4
Bahrain	1.1	1.1	1.0
Brazil	0.9	0.7	0.7
Croatia	0.6	0.6	0.8
Egypt	0.6	0.6	0.7
Germany	16.2	14.7	15.7
Greece	2.1	2.0	2.0
India	0.9	0.8	0.8
Indonesia	0.8	0.8	0.4
Italy	3.1	3.0	3.3
Korea	5.2	5.1	5.8
Oman	0.4	1.3	---
Romania	0.8	0.7	0.7
Serbia	0.5	0.5	0.5
Slovenia	0.4	0.6	0.9
South Africa	1.4	1.4	1.2
Spain	2.6	2.4	2.4
Taiwan	0.7	0.9	0.9
Turkey	1.9	1.9	2.3
China	21.4	25.8	24.6
France	4.9	4.4	4.6
Switzerland	3.2	2.7	2.7
Belgium	2.8	2.7	2.5
Austria	2.0	1.8	1.7
Japan	2.2	1.8	1.7
United Kingdom	1.7	1.7	1.6
Norway	1.6	1.4	1.4
All other exporters	11.5	11.0	12.6
All reporting exporters	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92 reported by various national statistical authorities in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Canada

Canada is a leading nonsubject source of U.S. imports of flat-rolled aluminum products, including CAAS, and the two countries share a highly integrated aluminum supply chain.¹⁶² Certain U.S. producers of CAAS also have operations in Canada. For example, Novelis has one aluminum rolling mill in Kingston, Ontario that produces various flat-rolled aluminum products for marine, transportation, and industrial applications. The Kingston facility also possesses annealing, cold rolling, and finishing equipment.¹⁶³

Data on Canada's exports of aluminum plate, sheet and strip (of a thickness exceeding 0.2mm) are presented in table VII-77. According to GTA, the leading export markets for aluminum plate, sheet and strip from Canada are the United States, China, and Turkey. During 2019, the United States accounted for 97.0 percent of Canada's total exports. China and Turkey accounted for 1.5 percent and 0.3 percent of Canada's total exports, respectively.

¹⁶² The Aluminum Association, "Aluminum Association to Trump Administration: Use NAFTA Negotiation Process to Resolve Section 232 Aluminum Tariffs," September 10, 2018, <https://www.aluminum.org/news/aluminum-association-trump-administration-use-nafta-negotiation-process-resolve-section-232>, retrieved April 3, 2020.

¹⁶³ Novelis, "About Us," <https://novelis.com/about-us/locations/>, retrieved April 2, 2020.

Table VII-77**Aluminum plates, sheets and strip: Exports from Canada by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	175,014	158,544	145,581
China	1,834	2,969	2,290
Turkey	94	202	513
Hong Kong	0	203	356
Brazil	83	60	158
Indonesia	---	68	154
Malaysia	7	29	153
France	128	159	147
Peru	0	19	74
All other destination markets	998	1,141	630
Total exports	178,159	163,393	150,056
	Share of quantity (percent)		
United States	98.2	97.0	97.0
China	1.0	1.8	1.5
Turkey	0.1	0.1	0.3
Hong Kong	0.0	0.1	0.2
Brazil	0.0	0.0	0.1
Indonesia	---	0.0	0.1
Malaysia	0.0	0.0	0.1
France	0.1	0.1	0.1
Peru	0.0	0.0	0.0
All other destination markets	0.6	0.7	0.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by statistics Canada in the Global Trade Atlas database, accessed January 11, 2021.

The industry in China

Data on China's exports of aluminum plate, sheet and strip (of a thickness exceeding 0.2mm) are presented in table VII-78. According to GTA, the leading export markets for aluminum plate, sheet and strip from China are Mexico, Korea, and the United States. During 2019, Mexico accounted for 10.6 percent of China's total exports. Korea and the United States accounted for 9.1 percent and 5.7 percent of China's total exports, respectively.

Table VII-78
Aluminum plates, sheets and strip: Exports from China by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	553,602	272,548	163,086
Mexico	97,557	176,138	306,099
Korea	209,642	345,786	263,836
Thailand	107,701	145,671	146,694
Vietnam	76,288	123,440	138,856
Indonesia	135,202	207,036	124,776
India	79,664	198,480	123,411
Nigeria	102,508	116,326	122,606
Canada	71,682	119,551	117,618
All other destination markets	854,661	1,375,719	1,376,911
Total exports	2,288,507	3,080,696	2,883,892
	Share of quantity (percent)		
United States	24.2	8.8	5.7
Mexico	4.3	5.7	10.6
Korea	9.2	11.2	9.1
Thailand	4.7	4.7	5.1
Vietnam	3.3	4.0	4.8
Indonesia	5.9	6.7	4.3
India	3.5	6.4	4.3
Nigeria	4.5	3.8	4.3
Canada	3.1	3.9	4.1
All other destination markets	37.3	44.7	47.7
Total exports	100.0	100.0	100.0

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by China customs in the Global Trade Atlas database, accessed January 11, 2021.

The industry in Greece

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Greece are the United States, Germany, and France (table VII-79). During 2019, the United States was the top export market for those exports from Greece, accounting for 17.0 percent of exports by quantity, followed by Germany and France, accounting for 12.1 percent and 11.0 percent, respectively.

Table VII-79
Aluminum plates, sheets and strip: Exports from Greece by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	19,815	37,047	40,032
Germany	33,056	32,432	28,591
France	24,708	26,885	26,055
Poland	20,376	21,138	22,836
Turkey	17,120	17,414	16,561
Italy	18,578	16,055	16,185
Netherlands	12,275	11,923	12,939
Czech Republic	9,323	9,398	9,608
Spain	6,126	6,450	6,268
All other destination markets	61,512	60,587	56,983
All destination markets	222,888	239,328	236,057
	Share of quantity (percent)		
United States	8.9	15.5	17.0
Germany	14.8	13.6	12.1
France	11.1	11.2	11.0
Poland	9.1	8.8	9.7
Turkey	7.7	7.3	7.0
Italy	8.3	6.7	6.9
Netherlands	5.5	5.0	5.5
Czech Republic	4.2	3.9	4.1
Spain	2.7	2.7	2.7
All other destination markets	27.6	25.3	24.1
All destination markets	100.0	100.0	100.0

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Korea

According to GTA, the leading export markets by quantity for aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) from Korea are Vietnam, China, and the United States (table VII-80). During 2019, the United States was the third largest export market for those exports from Korea, accounting for 6.7 percent of exports by quantity, preceded by Vietnam and China, accounting for 21.8 percent and 12.1 percent, respectively.

Table VII-80
Aluminum plates, sheets and strip: Exports from Korea by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	12,632	24,397	45,541
Vietnam	140,199	151,520	148,618
China	79,292	88,874	82,443
Australia	40,851	39,405	43,144
Mexico	10,657	22,331	40,957
Thailand	42,933	31,427	37,399
Japan	28,034	32,071	36,186
India	24,386	34,121	27,738
Turkey	1,274	8,035	20,912
All other destination markets	172,907	176,200	198,361
Total exports	553,166	608,381	681,299
	Share of quantity (percent)		
United States	2.3	4.0	6.7
Vietnam	25.3	24.9	21.8
China	14.3	14.6	12.1
Australia	7.4	6.5	6.3
Mexico	1.9	3.7	6.0
Thailand	7.8	5.2	5.5
Japan	5.1	5.3	5.3
India	4.4	5.6	4.1
Turkey	0.2	1.3	3.1
All other destination markets	31.3	29.0	29.1
Total exports	100.0	100.0	100.0

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by Korea Trade Statistics Promotion Institute in the Global Trade Atlas database, accessed December 22, 2020.

The industry in Mexico

Like Canada, Mexico also shares a highly integrated aluminum supply chain with the United States and it is a leading nonsubject source for U.S. imports of flat-rolled aluminum products, including CAAS.¹⁶⁴ Industria Mexicana Del Aluminio (“Alemexa”), one of Mexico’s largest producers of flat-rolled and extruded aluminum products, operates two facilities near Mexico City—one in Cuautitlán and another in Tulpetlac. The Cuautitlán facility produces aluminum discs and sheet products, while the Tulpetlac facility produces thinner gauge aluminum foil products. Combined, the two plants employ more than 600 workers and have an annual production capacity of more than 40,000 metric tons.¹⁶⁵ Alemexa has vertically integrated operations equipped with smelting furnaces and heat treating furnaces as well as hot and cold rolling mills.¹⁶⁶

Data on Mexico’s exports of aluminum plate, sheet and strip (of a thickness exceeding 0.2mm) are presented in table VII-81. According to GTA, the leading export markets for aluminum plate, sheet and strip from Mexico in 2018 are the United States, Panama, and Columbia. During 2018, the United States accounted for 78.8 percent of Mexico’s total exports. Panama and Columbia accounted for 7.6 percent and 6.3 percent of Mexico’s total exports, respectively.

¹⁶⁴ The Aluminum Association, “Aluminum Association to Trump Administration: Use NAFTA Negotiation Process to Resolve Section 232 Aluminum Tariffs,” September 10, 2018, <https://www.aluminum.org/news/aluminum-association-trump-administration-use-nafta-negotiation-process-resolve-section-232>, retrieved April 3, 2020.

¹⁶⁵ Alemexa, “About Alemexa,” <http://www.almexa.com.mx/sobre-nosotros/acerca-de-nosotros/>, retrieved April 1, 2020.

¹⁶⁶ Alemexa, “Infrastructure: Plants,” <http://www.almexa.com.mx/infraestructura/plantas/>, retrieved April 1, 2020.

Table VII-81**Aluminum plates, sheets and strip: Exports from Mexico by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	3,441	7,098	5,817
Panama	53	681	---
Colombia	1,071	567	---
China	196	165	---
Dominican Republic	20	130	---
Guatemala	124	90	---
Czech Republic	0	51	---
Honduras	6	39	---
Nicaragua	0	34	---
All other destination markets	228	150	---
Total exports	5,139	9,006	5,817
	Share of quantity (percent)		
United States	67.0	78.8	100.0
Panama	1.0	7.6	---
Colombia	20.8	6.3	---
China	3.8	1.8	---
Dominican Republic	0.4	1.4	---
Guatemala	2.4	1.0	---
Czech Republic	0.0	0.6	---
Honduras	0.1	0.4	---
Nicaragua	0.0	0.4	---
All other destination markets	4.4	1.7	---
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.19, and 7606.92 as reported by INEGI in the Global Trade Atlas database, accessed January 11, 2021.

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
85 FR 14702, March 13, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-03-13/pdf/2020-05169.pdf
85 FR 19444, April 7, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Republic of Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-03-13/pdf/2020-05169.pdf
85 FR 19449, April 7, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, India, and the Republic of Turkey: Initiation of Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-04-07/pdf/2020-07180.pdf
85 FR 23842 April 29, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey</i>	https://www.govinfo.gov/content/pkg/FR-2020-04-29/pdf/2020-09075.pdf
85 FR 29930, May 19, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, India, and the Republic of Turkey: Postponement of Preliminary Determinations in the Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-05-19/pdf/2020-10750.pdf

Citation	Title	Link
85 FR 45576, July 29, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Republic of Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and the Republic of Turkey: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-07-29/pdf/2020-16427.pdf
85 FR 49636, August 14, 2020	<i>Common Alloy Aluminum Sheet From Bahrain: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2020-08-14/pdf/2020-17835.pdf
85 FR 49634, August 14, 2020	<i>Common Alloy Aluminum Sheet From Brazil: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2020-08-14/pdf/2020-17845.pdf
85 FR 49631, August 14, 2020	<i>Common Alloy Aluminum Sheet From India: Preliminary Affirmative Countervailing Duty Determination, Preliminary Negative Critical Circumstances Determination, and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2020-08-14/pdf/2020-17809.pdf
85 FR 49629, August 14, 2020	<i>Common Alloy Aluminum Sheet From The Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances in Part, and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2020-08-14/pdf/2020-17810.pdf

Citation	Title	Link
85 FR 65372, October 15, 2020	<i>Common Alloy Aluminum Sheet From Bahrain: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22804.pdf
85 FR 65363, October 15, 2020	<i>Common Alloy Aluminum Sheet From Brazil: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22818.pdf
85 FR 65384, October 15, 2020	<i>Common Alloy Aluminum Sheet From Croatia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22817.pdf
85 FR 65382, October 15, 2020	<i>Common Alloy Aluminum Sheet From Egypt: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22816.pdf
85 FR 65386, October 15, 2020	<i>Common Alloy Aluminum Sheet From Germany: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22819.pdf
85 FR 65374, October 15, 2020	<i>Common Alloy Aluminum Sheet From Greece: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22798.pdf

Citation	Title	Link
85 FR 65377, October 15, 2020	<i>Common Alloy Aluminum Sheet From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22810.pdf
85 FR 65356, October 15, 2020	<i>Common Alloy Aluminum Sheet From Indonesia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22814.pdf
85 FR 65342, October 15, 2020	<i>Common Alloy Aluminum Sheet From Italy: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22820.pdf
85 FR 65354, October 15, 2020	<i>Common Alloy Aluminum Sheet From the Republic of Korea: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22799.pdf
85 FR 65340, October 15, 2020	<i>Common Alloy Aluminum Sheet From the Sultanate of Oman: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Negative Determination of Critical Circumstances, and Postponement of Final Determination</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22805.pdf
85 FR 65358, October 15, 2020	<i>Common Alloy Aluminum Sheet From Romania: Preliminary Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22815.pdf

Citation	Title	Link
85 FR 65370, October 15, 2020	<i>Common Alloy Aluminum Sheet From Serbia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22809.pdf
85 FR 65349, October 15, 2020	<i>Common Alloy Aluminum Sheet from Slovenia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22800.pdf
85 FR 65351, October 15, 2020	<i>Common Alloy Aluminum Sheet From South Africa: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22802.pdf
85 FR 65367, October 15, 2020	<i>Common Alloy Aluminum Sheet From Spain: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22813.pdf
85 FR 65361, October 15, 2020	<i>Common Alloy Aluminum Sheet From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22803.pdf

Citation	Title	Link
85 FR 65346, October 15, 2020	<i>Common Alloy Aluminum Sheet From Turkey: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-15/pdf/2020-22801.pdf
85 FR 71049, November 6, 2020	<i>Common Alloy Aluminum Sheet From Indonesia and Romania: Postponement of Final Determinations of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-11-06/pdf/2020-24700.pdf
85 FR 73511, November 18, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey; Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-11-18/pdf/2020-25423.pdf
86 FR 13333, March 8, 2021	<i>Common Alloy Aluminum Sheet From Bahrain: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04723.pdf
86 FR 13289, March 8, 2021	<i>Common Alloy Aluminum Sheet From Brazil: Final Negative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04724.pdf
86 FR 13285, March 8, 2021	<i>Common Alloy Aluminum Sheet From India: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04726.pdf
86 FR 13315, March 8, 2021	<i>Common Alloy Aluminum Sheet From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04733.pdf

Citation	Title	Link
86 FR 13331, March 8, 2021	<i>Common Alloy Aluminum Sheet From Bahrain: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04721.pdf
86 FR 13302, March 8, 2021	<i>Common Alloy Aluminum Sheet From Brazil: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04725.pdf
86 FR 13312, March 8, 2021	<i>Common Alloy Aluminum Sheet From Croatia: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04729.pdf
86 FR 13324, March 8, 2021	<i>Common Alloy Aluminum Sheet From Egypt: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04730.pdf
86 FR 13318, March 8, 2021	<i>Common Alloy Aluminum Sheet From Germany: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04731.pdf
86 FR 13300, March 8, 2021	<i>Common Alloy Aluminum Sheet From Greece: Final Negative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04737.pdf
86 FR 13282, March 8, 2021	<i>Common Alloy Aluminum Sheet From India: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04726.pdf
86 FR 13304, March 8, 2021	<i>Common Alloy Aluminum Sheet From Indonesia: Final Determination of Sales at Less Than Fair Value, and Final Affirmative Finding of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04738.pdf
86 FR 13309, March 8, 2021	<i>Common Alloy Aluminum Sheet From Italy: Final Affirmative Determination of Sales at Less Than Fair Value (LTFV)</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04739.pdf

Citation	Title	Link
86 FR 13307, March 8, 2021	<i>Common Alloy Aluminum Sheet From the Republic of Korea: Final Negative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04740.pdf
86 FR 13328, March 8, 2021	<i>Common Alloy Aluminum Sheet From the Sultanate of Oman: Final Affirmative Determination of Sales at Less Than Fair Value and Negative Determination of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04741.pdf
86 FR 13320, March 8, 2021	<i>Common Alloy Aluminum Sheet From Romania: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04742.pdf
86 FR 13295, March 8, 2021	<i>Common Alloy Aluminum Sheet From Serbia: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04743.pdf
86 FR 13305, March 8, 2021	<i>Common Alloy Aluminum Sheet From Slovenia: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04732.pdf
86 FR 13287, March 8, 2021	<i>Common Alloy Aluminum Sheet From South Africa: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04734.pdf
86 FR 13298, March 8, 2021	<i>Common Alloy Aluminum Sheet From Spain: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04722.pdf
86 FR 13293, March 8, 2021	<i>Common Alloy Aluminum Sheet From Taiwan: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04727.pdf

Citation	Title	Link
86 FR 13326, March 8, 2021	<i>Common Alloy Aluminum Sheet From Turkey: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-08/pdf/2021-04735.pdf
86 FR 14338, March 15, 2021	<i>Termination of Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-15/pdf/2021-05280.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing via videoconference:

Subject: Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

Inv. Nos.: 701-TA-639-642 and 731-TA-1475-1492 (Final)

Date and Time: March 2, 2021 - 9:30 a.m.

CONGRESSIONAL APPEARANCE:

The Honorable Shelley Moore Capito, United States Senator, West Virginia

EMBASSY WITNESS:

**Embassy of Indonesia
Washington, DC**

Mr. Wijayanto, Commercial Attaché

FOREIGN DELEGATION WITNESS:

**Delegation of the European Union to the United States of America
Washington, DC**

Sibylle Zitko, Senior Legal Advisor

FOREIGN GOVERNMENT WITNESS:

Government of Bahrain

**Her Excellency Eman Al-Doseri, Undersecretary for Commerce Affairs at the Ministry of Industry,
Commerce and Tourism**

OPENING REMARKS:

Petitioners (**John M. Herrmann, Kelley Drye & Warren LLP**)
Respondents (**Edmund W. Sim, Appleton Luff PTE LTD**)

**In Support of the Imposition of
Antidumping and Countervailing Duty Orders:**

Kelley Drye & Warren LLP
Washington, DC
on behalf of

Aluminum Association Common Alloy Aluminum Sheet
Trade Enforcement Working Group and its individual members

Mark Vrabec, Executive Vice President and Chief Commercial Officer,
Arconic Corporation

Mike Keown, Chief Executive Officer, Commonwealth Rolled Products, Inc.

Lloyd Stemple, Chief Executive Officer, Constellium Rolled Products
Ravenswood LLC

Lee McCarter, Executive Chairman of the Board of Directors,
JW Aluminum Company

Ryan Roush, Chief Commercial Officer, JW Aluminum Company

Davide Ricci, Director of Sales & Marketing, Novelis Corporation

Gary Tucci, Director of Recycling Strategy, Novelis Corporation

Johnny Hsieh, President, Texarkana Aluminum, Inc.

Ryan Olsen, Vice President for Market Growth and Development,
The Aluminum Association

Roxanne Brown, International Vice President at Large, United Steel,
Paper and Forestry, Rubber, Manufacturing, Energy, Allied
Industrial and Service Workers International Union

Brad Hudgens, Economic Consultant, Georgetown Economic Services

John M. Herrmann)
Paul C. Rosenthal)
R. Alan Luberda) – OF COUNSEL
Grace W. Kim)
Joshua R. Morey)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders:**

Akin Gump Strauss Hauer & Feld LLP
Washington, DC
on behalf of

Oman Aluminium Rolling Company LLC (“OARC”)

Peter Rijkoort, Chief Executive Officer, OARC

Bernd G. Janzen) – OF COUNSEL

Arent Fox LLP
Washington, DC
on behalf of

Istanbul Ferrous and Non-Ferrous Metals Exporters’ Association (“IDDMIB”)
Assan Alüminyum Sanayi ve Ticaret A.S. (“Assan”)

Atilla Cetinel, Head of Americas BU, Assan Alüminyum

Scott Croft, Vice President, Americas Sales, Assan Alüminyum

Yavuz Arkun, Strategy and Marketing Director, Assan Alüminyum

Matthew M. Nolan)
) – OF COUNSEL
John A. Gurtunca)

Appleton Luff PTE LTD
Law Office of Neil Ellis PLLC
Washington, DC
on behalf of

Hydro Aluminum Rolled Products GmbH (“HARP”)

Peter T. Ohlendorf, Vice President, Rolled Products,
Hydro Aluminum Metals USA

Dr. Pascal Wagner, Senior Vice President, HARP

John M. Woehlke, Principal, JW Metal Consulting

Jennifer Lutz, Vice President, Economic Consulting Services, LLC

Susannah Perkins, Economist, Economic Consulting Services, LLC

Edmund W. Sim)
Kelly A. Slater) – OF COUNSEL
Neil R. Ellis)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Baker & McKenzie LLP
Washington, DC
on behalf of

Gulf Aluminium Rolling Mill B.S.C. (c)
GARMCO USA, Inc.
(collectively, "GARMCO")

Lance Douglas, Vice President Sales and Marketing, GARMCO

Ilhan Eser, Chief Executive Officer, Morin Corporation

Christine M. Streatfeild)
) – OF COUNSEL
Fatima Alhasan)

Jones Walker
Washington, DC
on behalf of

Chart Industries, Inc. ("Chart")

Stephen Hayward, Vice President of Global Sourcing, Chart

Marc C. Hebert) – OF COUNSEL

Sandler, Travis & Rosenberg P.A.
Washington, DC
on behalf of

Hulamin Operations Proprietary Limited ("Hulamin")

Clayton Fisher, Group Executive and Managing Director,
Rolled Products, Hulamin

Kristen Smith)
) – OF COUNSEL
Sarah E. Yuskaitis)

Vorys, Sater, Seymour and Pease LLP
Washington, DC
on behalf of

ElvalHalcor Hellenic Copper and Aluminum Industry S.A.

Frederick P. Waite)
) – OF COUNSEL
Kimberly R. Young)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

White & Case LLP
Washington, DC
on behalf of

Companhia Brasileira de Alumínio (“CBA Alumínio”)
CBA Itapissuma Ltda (“CBA Itapissuma”)
(collectively, “CBA”)

Fabiano Schneider Urso, Commercial General Manager,
Downstream Business Unit, CBA

David E. Bond)
) – OF COUNSEL
Luca Bertazzo)

Trade Pacific PLLC
Washington, DC
on behalf of

Impol d.o.o.

Jonathan M. Freed) – OF COUNSEL

Neville Peterson LLP
Washington, DC
on behalf of

Alro SA

Lawrence J. Bogard)
) – OF COUNSEL
John B. Totaro, Jr.)

INTERESTED PARTIES IN OPPOSITION:

Sarvada Legal
New Delhi, India
on behalf of

Hindalco Industries Limited (“Hindalco”)

Atul Sharma) – OF COUNSEL

Mitsubishi Chemical Composites America ("MCCA")
Chesapeake, VA

William Yannetti, President and Chief Executive Officer, MCCA

REBUTTAL/CLOSING REMARKS:

Petitioners (**Paul C. Rosenthal**, Kelley Drye & Warren LLP)
Respondents (**Matthew M. Nolan**, Arent Fox LLP)

-END-

APPENDIX C
SUMMARY DATA

Table C-1a: CAAS: Summary data concerning the U.S. market including all U.S. producers.....C-3

Table C-1b: CAAS: Summary data concerning the U.S. market excluding one U.S. producer
***C-7

Table C-2: CAAS F temper re-roll stock: Summary data concerning the U.S. marketC-11

Table C-3: CAAS final temper: Summary data concerning the U.S. marketC-15

All CAAS: Co-extensive, all U.S. producers

Table C-1a

CAAS: Summary data concerning the U.S. market including all U.S. producers, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Brazil.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Indonesia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Romania.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Africa.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada.....	***	***	***	***	***	▼***	▼***	▼***	▲***
China.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Greece.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Romania.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Africa.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada.....	***	***	***	***	***	▼***	▼***	▼***	▲***
China.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Greece.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▲***	▼***	▼***

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Table C-1a--Continued

CAAS: Summary data concerning the U.S. market including all U.S. producers, 2017-19, January to September 2019, and January to September 2020
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. imports from:									
Bahrain:									
Quantity.....	65,162	64,944	76,865	63,058	19,361	▲18.0	▼(0.3)	▲18.4	▼(69.3)
Value.....	172,117	213,650	265,680	220,530	61,177	▲54.4	▲24.1	▲24.4	▼(72.3)
Unit value.....	\$2,641	\$3,290	\$3,456	\$3,497	\$3,160	▲30.9	▲24.5	▲5.1	▼(9.6)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Brazil:									
Quantity.....	24,533	28,094	36,466	28,504	9,748	▲48.6	▲14.5	▲29.8	▼(65.8)
Value.....	60,409	88,429	110,282	88,271	26,102	▲82.6	▲46.4	▲24.7	▼(70.4)
Unit value.....	\$2,462	\$3,148	\$3,024	\$3,097	\$2,678	▲22.8	▲27.8	▼(3.9)	▼(13.5)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia:									
Quantity.....	---	2,816	9,183	7,756	3,083	▲---	▲---	▲226.0	▼(60.3)
Value.....	---	9,918	29,260	25,187	7,872	▲---	▲---	▲195.0	▼(68.7)
Unit value.....	---	\$3,522	\$3,186	\$3,247	\$2,553	▲---	▲---	▼(9.5)	▼(21.4)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Egypt:									
Quantity.....	19	12,636	15,817	15,200	1,784	▲83,199.9	▲66,443.7	▲25.2	▼(88.3)
Value.....	49	40,227	49,587	47,853	3,769	▲100,580.5	▲81,575.0	▲23.3	▼(92.1)
Unit value.....	\$2,594	\$3,184	\$3,135	\$3,148	\$2,112	▲20.9	▲22.7	▼(1.5)	▼(32.9)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Germany:									
Quantity.....	32,998	44,690	88,932	70,360	34,687	▲169.5	▲35.4	▲99.0	▼(50.7)
Value.....	118,500	184,295	326,141	258,502	126,396	▲175.2	▲55.5	▲77.0	▼(51.1)
Unit value.....	\$3,591	\$4,124	\$3,667	\$3,674	\$3,644	▲2.1	▲14.8	▼(11.1)	▼(0.8)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India:									
Quantity.....	45,855	46,144	50,904	42,422	17,266	▲11.0	▲0.6	▲10.3	▼(59.3)
Value.....	105,093	128,919	140,336	117,606	43,491	▲33.5	▲22.7	▲8.9	▼(63.0)
Unit value.....	\$2,292	\$2,794	\$2,757	\$2,772	\$2,519	▲20.3	▲21.9	▼(1.3)	▼(9.1)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia:									
Quantity.....	72,170	83,701	58,726	56,537	6,403	▼(18.6)	▲16.0	▼(29.8)	▼(88.7)
Value.....	167,315	231,241	158,405	152,391	16,872	▼(5.3)	▲38.2	▼(31.5)	▼(88.9)
Unit value.....	\$2,318	\$2,763	\$2,697	\$2,695	\$2,635	▲16.3	▲19.2	▼(2.4)	▼(2.2)
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman:									
Quantity.....	27,798	69,663	91,204	73,597	50,840	▲228.1	▲150.6	▲30.9	▼(30.9)
Value.....	65,731	188,524	229,562	186,841	118,986	▲249.2	▲186.8	▲21.8	▼(36.3)
Unit value.....	\$2,365	\$2,706	\$2,517	\$2,539	\$2,340	▲6.4	▲14.4	▼(7.0)	▼(7.8)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Romania:									
Quantity.....	1,457	4,807	11,087	9,180	3,523	▲661.1	▲230.0	▲130.6	▼(61.6)
Value.....	4,652	17,110	34,499	28,737	10,267	▲641.6	▲267.8	▲101.6	▼(64.3)
Unit value.....	\$3,194	\$3,559	\$3,112	\$3,130	\$2,914	▼(2.6)	▲11.5	▼(12.6)	▼(6.9)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia:									
Quantity.....	---	74	3,806	1,892	967	▲---	▲---	▲5,035.3	▼(48.9)
Value.....	---	268	11,421	6,085	2,688	▲---	▲---	▲4,167.2	▼(55.8)
Unit value.....	---	\$3,611	\$3,001	\$3,216	\$2,779	▲---	▲---	▼(16.9)	▼(13.6)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia:									
Quantity.....	---	10,805	12,378	11,175	4,874	▲---	▲---	▲14.6	▼(56.4)
Value.....	---	37,063	41,438	37,770	12,604	▲---	▲---	▲11.8	▼(66.6)
Unit value.....	---	\$3,430	\$3,348	\$3,380	\$2,586	▲---	▲---	▼(2.4)	▼(23.5)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-1a--Continued

CAAS: Summary data concerning the U.S. market including all U.S. producers, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. imports from:--Continued									
South Africa:									
Quantity.....	33,947	48,875	45,611	35,464	12,513	▲34.4	▲44.0	▼(6.7)	▼(64.7)
Value.....	96,566	158,933	130,927	103,192	35,777	▲35.6	▲64.6	▼(17.6)	▼(65.3)
Unit value.....	\$2,845	\$3,252	\$2,871	\$2,910	\$2,859	▲0.9	▲14.3	▼(11.7)	▼(1.7)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Spain:									
Quantity.....	1,683	5,549	20,667	17,740	12,788	▲1,128.1	▲229.7	▲272.5	▼(27.9)
Value.....	6,118	21,017	66,863	58,308	36,637	▲992.9	▲243.5	▲218.1	▼(37.2)
Unit value.....	\$3,635	\$3,788	\$3,235	\$3,287	\$2,865	▼(11.0)	▲4.2	▼(14.6)	▼(12.8)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan:									
Quantity.....	581	35,717	57,196	48,666	19,493	▲9,745.7	▲6,048.2	▲60.1	▼(59.9)
Value.....	2,765	103,748	163,551	138,488	51,628	▲5,815.3	▲3,652.4	▲57.6	▼(62.7)
Unit value.....	\$4,759	\$2,905	\$2,859	\$2,846	\$2,649	▼(39.9)	▼(39.0)	▼(1.6)	▼(6.9)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey:									
Quantity.....	6,676	24,704	51,565	41,636	27,570	▲672.4	▲270.0	▲108.7	▼(33.8)
Value.....	18,278	77,872	142,867	117,038	71,134	▲681.7	▲326.1	▲83.5	▼(39.2)
Unit value.....	\$2,738	\$3,152	\$2,771	\$2,811	\$2,580	▲1.2	▲15.1	▼(12.1)	▼(8.2)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
China:									
Quantity.....	390,874	166,735	49,261	37,489	37,091	▼(87.4)	▼(57.3)	▼(70.5)	▼(1.1)
Value.....	972,686	466,231	173,231	127,066	126,553	▼(82.2)	▼(52.1)	▼(62.8)	▼(0.4)
Unit value.....	\$2,488	\$2,796	\$3,517	\$3,389	\$3,412	▲41.3	▲12.4	▲25.8	▲0.7
Greece:									
Quantity.....	14,202	24,000	32,245	28,440	10,110	▲127.0	▲69.0	▲34.4	▼(64.5)
Value.....	43,402	86,858	117,479	103,384	33,825	▲170.7	▲100.1	▲35.3	▼(67.3)
Unit value.....	\$3,056	\$3,619	\$3,643	\$3,635	\$3,346	▲19.2	▲18.4	▲0.7	▼(8.0)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea:									
Quantity.....	12,003	21,637	42,312	35,527	9,918	▲252.5	▲80.3	▲95.6	▼(72.1)
Value.....	30,623	69,288	142,441	120,394	30,014	▲365.1	▲126.3	▲105.6	▼(75.1)
Unit value.....	\$2,551	\$3,202	\$3,366	\$3,389	\$3,026	▲31.9	▲25.5	▲5.1	▼(10.7)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources:									
Quantity.....	95,259	126,915	128,075	102,423	66,192	▲34.5	▲33.2	▲0.9	▼(35.4)
Value.....	344,976	524,639	501,333	399,257	251,695	▲45.3	▲52.1	▼(4.4)	▼(37.0)
Unit value.....	\$3,621	\$4,134	\$3,914	\$3,898	\$3,803	▲8.1	▲14.1	▼(5.3)	▼(2.5)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-1a--Continued

CAAS: Summary data concerning the U.S. market including all U.S. producers, 2017-19, January to September 2019, and January to September 2020
 (Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to September		Comparison years			Jan-Sep
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers:									
Average capacity quantity.....	***	***	***	1,410,730	1,565,147	▲***	▼***	▲***	▲10.9
Production quantity.....	***	***	***	1,052,811	912,364	▲***	▲***	▲***	▼(13.3)
Capacity utilization (fn1).....	***	***	***	74.6	58.3	▼***	▲***	▼***	▼(16.3)
U.S. shipments:									
Quantity.....	***	***	***	1,004,972	907,245	▲***	▲***	▲***	▼(9.7)
Value.....	***	***	***	3,340,900	2,611,926	▲***	▲***	▲***	▼(21.8)
Unit value.....	***	***	***	\$3,324	\$2,879	▲***	▲***	▲***	▼(13.4)
Export shipments:									
Quantity.....	***	***	***	55,878	39,191	▼***	▲***	▼***	▼(29.9)
Value.....	***	***	***	188,774	116,768	▲***	▲***	▼***	▼(38.1)
Unit value.....	***	***	***	\$3,378	\$2,979	▲***	▲***	▼***	▼(11.8)
Ending inventory quantity.....	***	***	***	217,788	203,391	▲***	▲***	▲***	▼(6.6)
Inventories/total shipments (fn1).....	***	***	***	15.4	16.1	▲***	▲***	▲***	▲0.7
Production workers.....	***	***	***	5,148	4,857	▼***	▼***	▼***	▼(5.7)
Hours worked (1,000s).....	***	***	***	8,871	7,909	▲***	▲***	▼***	▼(10.8)
Wages paid (\$1,000).....	***	***	***	269,535	250,212	▲***	▲***	▲***	▼(7.2)
Hourly wages (dollars per hour).....	***	***	***	\$30.38	\$31.64	▲***	▲***	▲***	▲4.1
Productivity (short tons per 1,000 hours)...	***	***	***	118.7	115.4	▲***	▲***	▲***	▼(2.8)
Unit labor costs.....	***	***	***	\$256	\$274	▼***	▼***	▼***	▲7.1
Net sales:									
Quantity.....	***	***	***	1,060,850	946,436	▲***	▲***	▲***	▼(10.8)
Value.....	***	***	***	3,530,182	2,728,664	▲***	▲***	▲***	▼(22.7)
Unit value.....	***	***	***	3,328	2,883	▲***	▲***	▲***	▼(13.4)
Cost of goods sold (COGS).....	***	***	***	3,026,993	2,487,531	▲***	▲***	▲***	▼(17.8)
Gross profit or (loss) (fn2).....	***	***	***	503,189	241,133	▲***	▲***	▲***	▼(52.1)
SG&A expenses.....	***	***	***	176,995	173,554	▲***	▼***	▲***	▼(1.9)
Operating income or (loss) (fn2).....	***	***	***	326,194	67,579	▲***	▲***	▲***	▼(79.3)
Net income or (loss) (fn2).....	***	***	***	196,037	(5,062)	▲***	▲***	▲***	▼***
Capital expenditures.....	***	***	***	230,558	138,778	▲***	▲***	▲***	▼(39.8)
Research and development expenses.....	***	***	***	10,864	6,537	▲***	▲***	▲***	▼(39.8)
Net assets.....	***	***	***	***	***	▲***	▲***	▲***	***
Unit COGS.....	***	***	***	2,853	2,628	▲***	▲***	▼***	▼(7.9)
Unit SG&A expenses.....	***	***	***	167	183	▲***	▼***	▲***	▲9.9
Unit operating income or (loss) (fn2).....	***	***	***	307	71	▲***	▲***	▲***	▼(76.8)
Unit net income or (loss) (fn2).....	***	***	***	185	(5)	▲***	▲***	▲***	▼***
COGS/sales (fn1).....	***	***	***	85.7	91.2	▼***	▼***	▼***	▲5.4
Operating income or (loss)/sales (fn1).....	***	***	***	9.2	2.5	▲***	▲***	▲***	▼(6.8)
Net income or (loss)/sales (fn1).....	***	***	***	5.6	(0.2)	▲***	▲***	▲***	▼(5.7)

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "----". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020

All CAAS: Co-extensive, related party exclusion

Table C-1b

CAAS: Summary data concerning the U.S. market excluding one U.S. producer *, 2017-19, January to September 2019, and January to September 2020**

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2017	Calendar year 2018	2019	January to September 2019	2020	Comparison years 2017-19	2017-18	2018-19	Jan-Sep 2019-20
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▲***	***	▲***	▲***
All producers.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Brazil.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Indonesia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Romania.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Africa.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada.....	***	***	***	***	***	▼***	▼***	▼***	▲***
China.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Greece.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▲***	***	▲***	▲***
All producers.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Romania.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Africa.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada.....	***	***	***	***	***	▼***	▼***	▼***	▲***
China.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Greece.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▲***	▼***	▼***

Table continued on next page.

Table C-1b--Continued

CAAS: Summary data concerning the U.S. market excluding one U.S. producer ***, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to September		Comparison years			Jan-Sep 2019-20
	2017	2018		2019	2019	2017-19	2017-18	2018-19	
U.S. imports from:									
Bahrain:									
Quantity.....	65,162	64,944	76,865	63,058	19,361	▲18.0	▼(0.3)	▲18.4	▼(69.3)
Value.....	172,117	213,650	265,680	220,530	61,177	▲54.4	▲24.1	▲24.4	▼(72.3)
Unit value.....	\$2,641	\$3,290	\$3,456	\$3,497	\$3,160	▲30.9	▲24.5	▲5.1	▼(9.6)
Ending inventory quantity.....	***	***	***	***	***	▼3.9	▼***	▲***	▼***
Brazil:									
Quantity.....	24,533	28,094	36,466	28,504	9,748	▲48.6	▲14.5	▲29.8	▼(65.8)
Value.....	60,409	88,429	110,282	88,271	26,102	▲82.6	▲46.4	▲24.7	▼(70.4)
Unit value.....	\$2,462	\$3,148	\$3,024	\$3,097	\$2,678	▲22.8	▲27.8	▼(3.9)	▼(13.5)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia:									
Quantity.....	---	2,816	9,183	7,756	3,083	▲---	▲---	▲226.0	▼(60.3)
Value.....	---	9,918	29,260	25,187	7,872	▲---	▲---	▲195.0	▼(68.7)
Unit value.....	---	\$3,522	\$3,186	\$3,247	\$2,553	▲---	▲---	▼(9.5)	▼(21.4)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Egypt:									
Quantity.....	19	12,636	15,817	15,200	1,784	▲83,199.9	▲66,443.7	▲25.2	▼(88.3)
Value.....	49	40,227	49,587	47,853	3,769	▲100,580.5	▲81,575.0	▲23.3	▼(92.1)
Unit value.....	\$2,594	\$3,184	\$3,135	\$3,148	\$2,112	▲20.9	▲22.7	▼(1.5)	▼(32.9)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Germany:									
Quantity.....	32,998	44,690	88,932	70,360	34,687	▲169.5	▲35.4	▲99.0	▼(50.7)
Value.....	118,500	184,295	326,141	258,502	126,396	▲175.2	▲55.5	▲77.0	▼(51.1)
Unit value.....	\$3,591	\$4,124	\$3,667	\$3,674	\$3,644	▲2.1	▲14.8	▼(11.1)	▼(0.8)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India:									
Quantity.....	45,855	46,144	50,904	42,422	17,266	▲11.0	▲0.6	▲10.3	▼(59.3)
Value.....	105,093	128,919	140,336	117,606	43,491	▲33.5	▲22.7	▲8.9	▼(63.0)
Unit value.....	\$2,292	\$2,794	\$2,757	\$2,772	\$2,519	▲20.3	▲21.9	▼(1.3)	▼(9.1)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia:									
Quantity.....	72,170	83,701	58,726	56,537	6,403	▼(18.6)	▲16.0	▼(29.8)	▼(88.7)
Value.....	167,315	231,241	158,405	152,391	16,872	▼(5.3)	▲38.2	▼(31.5)	▼(88.9)
Unit value.....	\$2,318	\$2,763	\$2,697	\$2,695	\$2,635	▲16.3	▲19.2	▼(2.4)	▼(2.2)
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman:									
Quantity.....	27,798	69,663	91,204	73,597	50,840	▲228.1	▲150.6	▲30.9	▼(30.9)
Value.....	65,731	188,524	229,562	186,841	118,986	▲249.2	▲186.8	▲21.8	▼(36.3)
Unit value.....	\$2,365	\$2,706	\$2,517	\$2,539	\$2,340	▲6.4	▲14.4	▼(7.0)	▼(7.8)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Romania:									
Quantity.....	1,457	4,807	11,087	9,180	3,523	▲661.1	▲230.0	▲130.6	▼(61.6)
Value.....	4,652	17,110	34,499	28,737	10,267	▲641.6	▲267.8	▲101.6	▼(64.3)
Unit value.....	\$3,194	\$3,559	\$3,112	\$3,130	\$2,914	▼(2.6)	▲11.5	▼(12.6)	▼(6.9)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia:									
Quantity.....	---	74	3,806	1,892	967	▲---	▲---	▲5,035.3	▼(48.9)
Value.....	---	268	11,421	6,085	2,688	▲---	▲---	▲4,167.2	▼(55.8)
Unit value.....	---	\$3,611	\$3,001	\$3,216	\$2,779	▲---	▲---	▼(16.9)	▼(13.6)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia:									
Quantity.....	---	10,805	12,378	11,175	4,874	▲---	▲---	▲14.6	▼(56.4)
Value.....	---	37,063	41,438	37,770	12,604	▲---	▲---	▲11.8	▼(66.6)
Unit value.....	---	\$3,430	\$3,348	\$3,380	\$2,586	▲---	▲---	▼(2.4)	▼(23.5)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-1b--Continued

CAAS: Summary data concerning the U.S. market excluding one U.S. producer ***, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2017	Calendar year		January to September		Comparison years			Jan-Sep 2019-20
		2018	2019	2019	2020	2017-19	2017-18	2018-19	
U.S. imports from:--Continued									
South Africa:									
Quantity.....	33,947	48,875	45,611	35,464	12,513	▲34.4	▲44.0	▼(6.7)	▼(64.7)
Value.....	96,566	158,933	130,927	103,192	35,777	▲35.6	▲64.6	▼(17.6)	▼(65.3)
Unit value.....	\$2,845	\$3,252	\$2,871	\$2,910	\$2,859	▲0.9	▲14.3	▼(11.7)	▼(1.7)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Spain:									
Quantity.....	1,683	5,549	20,667	17,740	12,788	▲1,128.1	▲229.7	▲272.5	▼(27.9)
Value.....	6,118	21,017	66,863	58,308	36,637	▲992.9	▲243.5	▲218.1	▼(37.2)
Unit value.....	\$3,635	\$3,788	\$3,235	\$3,287	\$2,865	▼(11.0)	▲4.2	▼(14.6)	▼(12.8)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan:									
Quantity.....	581	35,717	57,196	48,666	19,493	▲9,745.7	▲6,048.2	▲60.1	▼(59.9)
Value.....	2,765	103,748	163,551	138,488	51,628	▲5,815.3	▲3,652.4	▲57.6	▼(62.7)
Unit value.....	\$4,759	\$2,905	\$2,859	\$2,846	\$2,649	▼(39.9)	▼(39.0)	▼(1.6)	▼(6.9)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey:									
Quantity.....	6,676	24,704	51,565	41,636	27,570	▲672.4	▲270.0	▲108.7	▼(33.8)
Value.....	18,278	77,872	142,867	117,038	71,134	▲681.7	▲326.1	▲83.5	▼(39.2)
Unit value.....	\$2,738	\$3,152	\$2,771	\$2,811	\$2,580	▲1.2	▲15.1	▼(12.1)	▼(8.2)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
China:									
Quantity.....	390,874	166,735	49,261	37,489	37,091	▼(87.4)	▼(57.3)	▼(70.5)	▼(1.1)
Value.....	972,686	466,231	173,231	127,066	126,553	▼(82.2)	▼(52.1)	▼(62.8)	▼(0.4)
Unit value.....	\$2,488	\$2,796	\$3,517	\$3,389	\$3,412	▲41.3	▲12.4	▲25.8	▲0.7
Greece:									
Quantity.....	14,202	24,000	32,245	28,440	10,110	▲127.0	▲69.0	▲34.4	▼(64.5)
Value.....	43,402	86,858	117,479	103,384	33,825	▲170.7	▲100.1	▲35.3	▼(67.3)
Unit value.....	\$3,056	\$3,619	\$3,643	\$3,635	\$3,346	▲19.2	▲18.4	▲0.7	▼(8.0)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea:									
Quantity.....	12,003	21,637	42,312	35,527	9,918	▲252.5	▲80.3	▲95.6	▼(72.1)
Value.....	30,623	69,288	142,441	120,394	30,014	▲365.1	▲126.3	▲105.6	▼(75.1)
Unit value.....	\$2,551	\$3,202	\$3,366	\$3,389	\$3,026	▲31.9	▲25.5	▲5.1	▼(10.7)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources:									
Quantity.....	95,259	126,915	128,075	102,423	66,192	▲34.5	▲33.2	▲0.9	▼(35.4)
Value.....	344,976	524,639	501,333	399,257	251,695	▲45.3	▲52.1	▼(4.4)	▼(37.0)
Unit value.....	\$3,621	\$4,134	\$3,914	\$3,898	\$3,803	▲8.1	▲14.1	▼(5.3)	▼(2.5)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-1b--Continued

CAAS: Summary data concerning the U.S. market excluding one U.S. producer *, 2017-19, January to September 2019, and January to September 2020**

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to September		Comparison years			Jan-Sep 2019-20
	2017	2018		2019	2020	2017-19	2017-18	2018-19	
Included U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (short tons per 1,000 hours)...	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net assets.....	***	***	***	***	***	▲***	▲***	▼***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

CAAS re-roll: Semi-finished separate like product

Table C-2

CAAS re-roll: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Croatia.....	***	***	***	***	***	***	***	***	***
Egypt.....	***	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Indonesia.....	***	***	***	***	***	***	***	***	***
Italy, subject.....	***	***	***	***	***	▲***	***	▲***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Romania.....	***	***	***	***	***	***	***	***	***
Serbia.....	***	***	***	***	***	***	***	***	***
Slovenia.....	***	***	***	***	***	***	***	***	***
South Africa.....	***	***	***	***	***	▲***	***	▲***	▼***
Spain.....	***	***	***	***	***	▲***	***	▲***	▲***
Taiwan.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	▼***	▼***	▼***	***
Subject sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Canada.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
Italy, nonsubject.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
All other sources (including China).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Croatia.....	***	***	***	***	***	***	***	***	***
Egypt.....	***	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Indonesia.....	***	***	***	***	***	***	***	***	***
Italy, subject.....	***	***	***	***	***	▲***	***	▲***	▼***
Oman.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Romania.....	***	***	***	***	***	***	***	***	***
Serbia.....	***	***	***	***	***	***	***	***	***
Slovenia.....	***	***	***	***	***	***	***	***	***
South Africa.....	***	***	***	***	***	▲***	***	▲***	▼***
Spain.....	***	***	***	***	***	▲***	***	▲***	▲***
Taiwan.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	▼***	▼***	▼***	***
Subject sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Canada.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
Italy, nonsubject.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
All other sources (including China).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▼***	▲***	▼***	▼***

Table continued on next page.

Table C-2--Continued

CAAS re-roll: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. importers' U.S. imports from:									
Bahrain:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Brazil:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Croatia:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Egypt:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Germany:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Indonesia:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Italy, subject:									
Quantity.....	***	***	***	***	***	▲***	***	▲***	▼***
Value.....	***	***	***	***	***	▲***	***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	***	▲***	▼***
Oman:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Romania:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Serbia:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Slovenia:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
South Africa:									
Quantity.....	***	***	***	***	***	▲***	***	▲***	▼***
Value.....	***	***	***	***	***	▲***	***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	***	▲***	▼***
Spain:									
Quantity.....	***	***	***	***	***	▲***	***	▲***	▲***
Value.....	***	***	***	***	***	▲***	***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	***	▲***	▼***
Taiwan:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-2--Continued

CAAS re-roll: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to September		Comparison years			Jan-Sep 2019-20
	2017	2018		2019	2020	2017-19	2017-18	2018-19	
U.S. importers' U.S. imports from:--Continued									
Turkey:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	***
Value.....	***	C-3***	***	***	***	▼***	▼***	▼***	***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Canada:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Italy, nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Korea:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
All other sources, (including China):									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. producers':									
Average capacity quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Commercial U.S. shipments:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Productivity (short tons per 1,000 hours)...	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▼***

Table continued on next page.

Table C-2--Continued

CAAS re-roll: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to September		Comparison years			Jan-Sep 2019-20
	2017	2018		2019	2019	2020	2017-19	2017-18	
U.S. producers:--Continued									
Commercial sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "----". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires.

CAAS final temper: Semi-finished separate like product

Table C-3

CAAS final temper: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Brazil.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Croatia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Indonesia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Romania.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Africa.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Greece.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources (including China).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Importers' share (fn1):									
Bahrain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Croatia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Italy, subject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Oman.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Romania.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Serbia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Slovenia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Africa.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Canada.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Greece.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources (including China).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***

Table continued on next page.

Table C-3--Continued

CAAS final temper: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. imports from:									
Bahrain:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Croatia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Egypt:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Germany:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
India:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Indonesia:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Italy, subject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Oman:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Romania:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Serbia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Slovenia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
South Africa:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Spain:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Taiwan:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***

Table continued on next page.

Table C-3--Continued

CAAS final temper: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. imports from:--Continued									
Turkey:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Canada:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Greece:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy, nonsubject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Korea:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources (including China):									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. producers':									
Average capacity quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Production quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (short tons per 1,000 hours)...	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit labor costs.....	***	***	***	***	***	▼***	▼***	▲***	▲***

Table continued on next page.

Table C-3--Continued

CAAS final temper: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers'--Continued									
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using 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, 7606.92.6095, accessed December 17, 2020.

APPENDIX D

SECTION 232 DEVELOPMENTS

Table D-1
Section 232: Aluminum import national-security measures, 2017-20

Effective date	Actions and Affected U.S. trade partner(s)
April 26, 2017	Commerce announced the institution of an investigation, by its U.S. Bureau of Industry and Security (“BIS”) into the potential impact of imported aluminum products on national security. (82 FR 21509, May 9, 2017)
January 19, 2018	The Secretary of Commerce submitted the BIS Section 232 aluminum imports report to the President. (83 FR 11619, March 15, 2018)
March 23, 2018	The President announced the imposition of 10 percent ad valorem national-security duties on U.S. aluminum imports. Initially exempted— Canada and Mexico. (83 FR 11619, March 15, 2018)
March 23 through May 1, 2018	Adjustment: Exempted— Argentina, Australia, Brazil, Canada, Mexico, South Korea, and the European Union (“EU”) member states. (83 FR 13355, March 28, 2018)
May 1 through June 1, 2018	Adjustment: Exempted— Argentina, Australia, Brazil. Exemptions continued to June 1—Canada, Mexico, and EU member states. Exemption expired— South Korea. (83 FR 20677, May 7, 2018 and 83 FR 25849, June 5, 2018)
June 1, 2018	Adjustment: Exempted—Argentina (annual quota limit), Australia. Exemptions expired—Brazil, Canada, Mexico, and EU member states. (83 FR 25849, June 5, 2018)
September 11, 2018	Exclusion Process: Presidential Proclamation 9776 grants the Secretary of Commerce the authority to exclude aluminum articles for which there is a lack of domestic production capacity of comparable production, or to exclude aluminum articles from such restrictions for specific national security-based considerations. The BIS published an interim final rule establishing this exclusion process. (83 FR 46026, September 11, 2018)
May 20, 2019	Adjustment: Exemptions reinstated— Canada and Mexico. (84 FR 23983, May 23, 2019)
January 24, 2020	Adjustment: The President expanded the scope of the Section 232 measures to include imports of certain derivative (fabricated) aluminum articles. (85 FR 5281, January 29, 2020).
August 16, 2020	Adjustment: Exemptions discontinued— Canada. (85 FR 49921, August 14, 2020).
September 1, 2020	Adjustment: Exemptions reinstated— Canada. (85 FR 68709, October 27, 2020).
December 14, 2020	Exclusion Process: A ruling by the Department of Commerce’s Industry and Security Bureau establishes General Approved Exclusion for steel and aluminum articles for which exclusions have been requested and have not received any filed objections. These items would be allowed to be imported by any domestic firm, without volume limitations, for an indefinite period of time. The ruling cites 15 aluminum products that for which the General Approved Exclusion rule will go into effect on December 29, 2020. This includes HTS 7606.11.6000, which is subject to these investigations. (85 FR 81060, December 14, 2020).

Source: Cited *Federal Register* notices.

Section 232 exclusion requests

Individuals or organizations that use identified aluminum products and partake in U.S. business activities can submit requests to have certain products excluded from the Section 232 national security import tariffs. As of December 23, 2020, *** exclusion requests have been submitted to the U.S. Department of Commerce’s U.S. Bureau of Industry and Security (“BIS”) for specific products imported under the primary HTSUS statistical reporting numbers identified for CAAS in Commerce’s scope (table D-2). An additional *** exclusion requests have been submitted under discontinued HTSUS reporting numbers under which CAAS previously entered.¹ Of the total *** exclusion requests submitted under the HTSUS statistical reporting numbers identified in table D-2, *** percent cited “insufficient U.S. availability” as the primary reason for the submission, *** percent cited “no U.S. production,” and *** percent cited various “other” reasons.² Information presented in tables D-2, D-3, D-4, and D-5 may not reflect the most current status of exclusion requests that are marked as pending.³

¹ Upon receiving a request to make additions, removals, and other revisions to Chapter 76 of the Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”), the Section 484(f) Committee implemented a series of changes that discontinued the use of certain HTSUS statistical reporting numbers for which CAAS previously entered under, including: HTS 7606.12.3090, as of January 1, 2020; and HTS 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080 as of July 1, 2019. *HTSUS (2020) Basic Edition*, “Change Record,” USITC Publication 5011, January 1, 2020, <https://hts.usitc.gov/view/Change%20Record?release=2020HTSABasicB>, retrieved March 15, 2021.

² The Aluminum Association provides a list of current exclusions to its member companies through its “members only” portal, available at: <https://www.aluminum.org/sites/default/files/11.6.18%20New%20Exclusion%20Requests.%20New%20Format.xlsx>.

³ Information in tables is based on reported exclusion requests as of December 23, 2020. Between December 23, 2020 and March 8, 2021, an additional *** exclusion requests have been filed under the relevant HSTUS statistical reporting numbers outlined in Table D-2. Of those additional exclusion requests, *** were filed by domestic producers, ***. The Aluminum Association, “Section 232 Tariff Product Exemptions & Exclusions,” <https://www.aluminum.org/section-232-tariff-product-exemptions-exclusions>, retrieved March 16, 2021

Table D-2
Section 232: Exclusion requests for aluminum products, by HTSUS statistical reporting number,
as of December 23, 2020

HTSUS	Granted	Denied	Pending	Total
7606.11.3060	***	***	***	***
7606.11.6000	***	***	***	***
7606.12.3090 ^{1,2}	***	***	***	***
7606.12.3096	***	***	***	***
7606.12.6000	***	***	***	***
7606.91.3090 ³	***	***	***	***
7606.91.3095	***	***	***	***
7606.91.6080 ³	***	***	***	***
7606.91.6095	***	***	***	***
7606.92.3035	***	***	***	***
7606.92.3090 ³	***	***	***	***
7606.92.6080 ³	***	***	***	***
7606.92.6095	***	***	***	***
Current HTSUS	***	***	***	***
Discontinued	***	***	***	***
Total	***	***	***	***

¹ Discontinued as of January 1, 2020.

² Products that previously entered under HTS 7606.12.3090 were identified as aluminum plate, sheet, and strip with a thickness greater than 0.2 mm, rectangular, of aluminum alloys, not clad, with a thickness of 6.3 mm or less, other than aluminum can stock.

³ Discontinued as of July 1, 2019.

Note: Section 232 exclusion requests in this table are defined by the relevant HTSUS statistical reporting numbers. However, not all subject CAAS may be included. Conversely, certain other products excluded from the scope of these investigations may also be included.

Source: The Aluminum Association, "Section 232 Tariff Product Exemptions & Exclusions," <https://www.aluminum.org/section-232-tariff-product-exemptions-exclusions>, December 23, 2020; *HTSUS (2020) Basic Edition*, "Change Record," USITC Publication 5011, January 1, 2020, <https://hts.usitc.gov/view/Change%20Record?release=2020HTSABasicB>, retrieved January 14, 2021.

Table D-3 presents the top ten firms by total number of exclusion requests, as of December 23, 2020, for products entering under the primary HTSUS statistical reporting numbers identified in Commerce’s scope as well as discontinued HTSUS statistical reporting numbers under which CAAS previously entered the United States.

Table D-3
Section 232: Exclusion requests for certain aluminum products, by firm, as of December 23, 2020

Firm	Granted	Denied	Pending	Total
Novelis Corp. ¹	***	***	***	***
Mandel Metals	***	***	***	***
Fujifilm	***	***	***	***
AA Metals Inc.	***	***	***	***
Meyer Aluminum Blanks, Inc.	***	***	***	***
TitanX Engine Cooling Inc.	***	***	***	***
Southern Lithoplate	***	***	***	***
Thyssen Krupp Materials	***	***	***	***
Central National Gottesman Inc.	***	***	***	***
AKG North America	***	***	***	***
All other	***	***	***	***
Total	***	***	***	***

¹ Domestic producer.

Note: Section 232 exclusion requests in this table are defined by the relevant HTSUS statistical reporting numbers. However, not all subject CAAS may be included. Conversely, certain other products excluded from the scope of these investigations may also be included.

Source: The Aluminum Association, “Section 232 Tariff Product Exemptions & Exclusions,” <https://www.aluminum.org/section-232-tariff-product-exemptions-exclusions>, retrieved January 14, 2021.

Table D-4 presents the number and volume of excluded products requested by U.S. producers and all other firms, and the number and volume of excluded products granted to U.S. producers and all other firms by BIS, as of January 14, 2021. These exclusions were requested for products entering under the primary HTSUS statistical reporting numbers identified in Commerce’s scope as well as discontinued HTSUS statistical reporting numbers under which CAAS previously entered the United States. Of the *** exclusion requests submitted by U.S. producers and meeting the above specifications, *** were submitted for 1XXX, 3XXX, and 5XXX series alloys, while the remainder did not specify, or were submitted for out-of-scope 6XXX, 7XXX, or 8XXX series alloys.

Table D-4
Section 232: Exclusion requests for certain aluminum products, by volume, as of December 23, 2020

	Exclusion requests	Volume requested (short tons)			Requests granted	Volume granted (short tons)		
		2018	2019	2020		2018	2019	2020
U.S. producers	***	***	***	***	***	***	***	***
All other	***	***	***	***	***	***	***	***
Total	***	***	***	***	***	***	***	***

Note: U.S. producers that requested product exclusions from products entering under the HTSUS statistical reporting numbers previously identified include: ***. Section 232 exclusion requests in the table above are defined by the relevant HTSUS statistical reporting numbers. However, not all subject CAAS may be included. Conversely, certain product excluded from the scope of these investigations may also be included.

Source: The Aluminum Association, “Section 232 Tariff Product Exemptions & Exclusions,” <https://www.aluminum.org/section-232-tariff-product-exemptions-exclusions>, retrieved January 14, 2021.

Table D-5 presents U.S. producers provided reasons for exclusion requests, as of January 14, 2021. These exclusions were requested for products entering under the primary HTSUS statistical reporting numbers identified in Commerce’s scope as well as discontinued HTSUS statistical reporting numbers under which CAAS previously entered the United States. Of the total *** exclusion requests submitted by U.S. producers under the HTSUS statistical reporting numbers identified in table D-2, *** percent cited “insufficient U.S. availability” as the primary reason for the submission, *** percent cited “no U.S. production,” and *** percent cited various “other” reasons.⁴

Table D-5

Section 232: U.S. producers’ provided reasons for exclusion requests, as of December 23, 2020

	Insufficient U.S. availability/production	No U.S. production	Other	Total exclusion requests
Novelis Corporation	***	***	***	***
Granges International	***	***	***	***
Constellium	***	***	***	***
JW Aluminum	***	***	***	***
Arconic	***	***	***	***
TCI Texarkana	***	***	***	***
Jupiter Aluminum Company	***	***	***	***
Total	***	***	***	***

Source: The Aluminum Association, “Section 232 Tariff Product Exemptions & Exclusions,” <https://www.aluminum.org/section-232-tariff-product-exemptions-exclusions>, retrieved January 14, 2021.

⁴ The Aluminum Association, “Section 232 Tariff Product Exemptions & Exclusions,” <https://www.aluminum.org/section-232-tariff-product-exemptions-exclusions>, retrieved January 14, 2021.

APPENDIX E

**CHANNELS OF DISTRIBUTION, U.S. PRODUCERS' FINANCIAL RESULTS, FOREIGN
PRODUCERS' PRODUCTION AND EXPORTS TO THE U.S. BY TEMPER TYPE**

Table E-1: CAAS: U.S. producers' and importers' final temper U.S. shipments, by sources and channels of distribution	E-3
Table E-2: CAAS re-roll: U.S. producers' and importers' F temper, re-roll stock U.S. shipments, by sources and channels of distribution.....	E-8
Table E-3: CAAS reroll: Results of merchant only operations of U.S. producers.....	E-13
Table E-4: CAAS reroll: Changes in U.S. producers' merchant only AUV's.....	E-15
Table E-5: CAAS all other: Results of operations of U.S. producers.....	E-16
Table E-6: CAAS all other: Changes in U.S. producers' AUV's.....	E-18
Table E-7: CAAS: Foreign producers' production and exports to the U.S. by temper	E-19

Table E-1

CAAS: U.S. producers' and importers' final temper U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of final temper U.S. shipments (percent)				
U.S. producers:					
to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Subject sources					
to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Nonsubject sources					
to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All import sources					
to Distributors	71.3	67.4	60.4	61.7	53.7
to Converters	5.1	5.6	5.6	5.7	7.4
to Transportation	3.4	4.3	5.6	5.7	7.4
to Other end users	20.2	22.8	28.4	26.9	31.6

Table continued on next page.

Table E-1--Continued

CAAS all other: U.S. producers' and importers' final temper U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Share of final temper U.S. shipments (percent)					
U.S. importers: Bahrain to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Brazil to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Croatia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Egypt to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Germany to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table E-1--Continued

CAAS all other: U.S. producers' and importers' final temper U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Share of final temper U.S. shipments (percent)					
U.S. importers: India to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Indonesia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Italy (subject) to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Oman to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Romania to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table E-1--Continued

CAAS all other: U.S. producers' and importers' final temper U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of final temper U.S. shipments (percent)				
U.S. importers: Serbia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Slovenia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: South Africa to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Spain to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Taiwan to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Table continued on next page.

Table E-1--Continued

CAAS all other: U.S. producers' and importers' final temper U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Share of final temper U.S. shipments (percent)					
U.S. importers: Turkey to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Canada to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Greece to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Italy - Laminazione Sottile to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Korea to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All other sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Table E-2

CAAS re-roll: U.S. producers' and importers' F temper, re-roll stock U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of F temper re-roll stock U.S. shipments (percent)				
U.S. producers:					
to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Subject sources					
to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Nonsubject sources					
to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All import sources					
to Distributors	---	---	7.5	0.2	6.3
to Converters	100.0	95.3	74.7	84.3	50.5
to Transportation	---	0.2	0.3	0.2	0.1
to Other end users	---	4.5	17.5	15.3	43.1

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Table E-2--Continued

CAAS re-roll: U.S. producers' and importers' F temper, re-roll stock U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of F temper re-roll stock U.S. shipments (percent)				
U.S. importers: Bahrain to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Brazil to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Croatia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Egypt to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Germany to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

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Table E-2--Continued

CAAS re-roll: U.S. producers' and importers' F temper, re-roll stock U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of F temper re-roll stock U.S. shipments (percent)				
U.S. importers: India to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Indonesia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Italy (subject) to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Oman to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Romania to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

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Table E-2--Continued

CAAS re-roll: U.S. producers' and importers' F temper, re-roll stock U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of F temper re-roll stock U.S. shipments (percent)				
U.S. importers: Serbia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Slovenia to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: South Africa to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Spain to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Taiwan to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

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Table E-2--Continued

CAAS re-roll: U.S. producers' and importers' F temper, re-roll stock U.S. shipments, by sources and channels of distribution, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of F temper re-roll stock U.S. shipments (percent)				
U.S. importers: Turkey to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Canada to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Greece to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Italy - Laminazione Sottile to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: Korea to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***
U.S. importers: All other sources to Distributors	***	***	***	***	***
to Converters	***	***	***	***	***
to Transportation	***	***	***	***	***
to Other end users	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Table E-3
CAAS reroll: Results of merchant only operations of U.S. producers, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Total net commercial sales	***	***	***	***	***
	Value (1,000 dollars)				
Total net commercial sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Est. cash flow from operations	***	***	***	***	***
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

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Table E-3—Continued
CAAS reroll: Results of merchant only operations of U.S. producers, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio to total COGS (percent)				
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
	Unit value (dollars per short ton)				
Total net commercial sales	***	***	***	***	***
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	Number of firms reporting				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table E-4
CAAS reroll: Changes in U.S. producers' merchant only AUV's, 2017-19, January-September 2019,
and January-September 2020

Item	Between calendar years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
	Change in AUVs (percent)			
Total net commercial sales	▲ ***	▲ ***	▲ ***	▼ ***
Cost of goods sold.--				
Raw materials	▲ ***	▲ ***	▲ ***	▼ ***
Direct labor	▲ ***	▲ ***	▲ ***	▲ ***
Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
Average COGS	▲ ***	▲ ***	▲ ***	▼ ***
	Change in AUVs (dollars per short ton)			
Total net commercial sales	▲ ***	▲ ***	▲ ***	▼ ***
Cost of goods sold.--				
Raw materials	▲ ***	▲ ***	▲ ***	▼ ***
Direct labor	▲ ***	▲ ***	▲ ***	▲ ***
Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
Average COGS	▲ ***	▲ ***	▲ ***	▼ ***
Gross profit	▲ ***	▲ ***	▲ ***	▼ ***
SG&A expense	▲ ***	▲ ***	▲ ***	▲ ***
Operating income or (loss)	▲ ***	▲ ***	▲ ***	▼ ***
Net income or (loss)	▲ ***	▲ ***	▲ ***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table E-5
CAAS all other: Results of operations of U.S. producers, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
Total net sales	***	***	***	***	***
	Value (1,000 dollars)				
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Est. cash flow from operations	***	***	***	***	***
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

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Table E-5—Continued
CAAS all other: Results of operations of U.S. producers, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio to total COGS (percent)				
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
	Unit value (dollars per short ton)				
Total net sales	***	***	***	***	***
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	Number of firms reporting				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table E-6
CAAS all other: Changes in U.S. producers' AUV's, 2017-19, January-September 2019, and
January-September 2020

Item	Between calendar years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
	Change in AUVs (percent)			
Total net sales	▲ ***	▲ ***	▲ ***	▼ ***
Cost of goods sold.--				
Raw materials	▲ ***	▲ ***	▼ ***	▼ ***
Direct labor	▲ ***	▼ ***	▲ ***	▲ ***
Other factory costs	▲ ***	▲ ***	▲ ***	▼ ***
Average COGS	▲ ***	▲ ***	▼ ***	▼ ***
	Change in AUVs (dollars per short ton)			
Total net sales	▲ ***	▲ ***	▲ ***	▼ ***
Cost of goods sold.--				
Raw materials	▲ ***	▲ ***	▼ ***	▼ ***
Direct labor	▲ ***	▼ ***	▲ ***	▲ ***
Other factory costs	▲ ***	▲ ***	▲ ***	▼ ***
Average COGS	▲ ***	▲ ***	▼ ***	▼ ***
Gross profit	▲ ***	▲ ***	▲ ***	▼ ***
SG&A expense	▲ ***	▼ ***	▲ ***	▲ ***
Operating income or (loss)	▲ ***	▲ ***	▲ ***	▼ ***
Net income or (loss)	▲ ***	▲ ***	▲ ***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table E-7

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: Subject foreign producers					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Foreign producers' production from: Subject foreign producers					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Subject foreign producers					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Subject foreign producers					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Production (short tons)				
Foreign producers' production from: Bahrain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of production (percent)				
Foreign producers' production from: Bahrain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Exports to U.S. (short tons)				
Foreign producers' exports to the U.S. from: Bahrain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of exports to U.S. (percent)				
Foreign producers' exports to the U.S. from: Bahrain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Production (short tons)				
Foreign producers' production from: Brazil Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of production (percent)				
Foreign producers' production from: Brazil Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Exports to U.S. (short tons)				
Foreign producers' exports to the U.S. from: Brazil Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of exports to U.S. (percent)				
Foreign producers' exports to the U.S. from: Brazil Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Production (short tons)				
Foreign producers' production from: Croatia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of production (percent)				
Foreign producers' production from: Croatia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Exports to U.S. (short tons)				
Foreign producers' exports to the U.S. from: Croatia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of exports to U.S. (percent)				
Foreign producers' exports to the U.S. from: Croatia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Production (short tons)				
Foreign producers' production from: Egypt Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of production (percent)				
Foreign producers' production from: Egypt Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Exports to U.S. (short tons)				
Foreign producers' exports to the U.S. from: Egypt Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of exports to U.S. (percent)				
Foreign producers' exports to the U.S. from: Egypt Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: Germany					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Germany					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Germany					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Germany					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Production (short tons)					
Foreign producers' production from: India					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: India					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: India					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: India					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: Indonesia					
Final temper	NA	NA	NA	NA	NA
F temper re-roll	NA	NA	NA	NA	NA
All temper types	NA	NA	NA	NA	NA
Share of production (percent)					
Foreign producers' production from: Indonesia					
Final temper	NA	NA	NA	NA	NA
F temper re-roll	NA	NA	NA	NA	NA
All temper types	NA	NA	NA	NA	NA
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Indonesia					
Final temper	NA	NA	NA	NA	NA
F temper re-roll	NA	NA	NA	NA	NA
All temper types	NA	NA	NA	NA	NA
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Indonesia					
Final temper	NA	NA	NA	NA	NA
F temper re-roll	NA	NA	NA	NA	NA
All temper types	NA	NA	NA	NA	NA
Production (short tons)					
Foreign producers' production from: Italy					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Italy					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Italy					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Italy					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Table continued on next page.

Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: Oman					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Oman					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Oman					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Oman					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Production (short tons)					
Foreign producers' production from: Romania					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Romania					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Romania					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Romania					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Table continued on next page.

Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: Serbia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Serbia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Serbia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Serbia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Production (short tons)					
Foreign producers' production from: Slovenia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Slovenia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Slovenia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Slovenia					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Table continued on next page.

Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: South Africa Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: South Africa Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: South Africa Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: South Africa Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Production (short tons)					
Foreign producers' production from: Spain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Spain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Spain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Spain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Table continued on next page.

Table E-7--Continued

CAAS: Foreign producers' production and exports to the U.S. by temper, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production (short tons)					
Foreign producers' production from: Taiwan					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Taiwan					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Taiwan					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Taiwan					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Production (short tons)					
Foreign producers' production from: Turkey					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of production (percent)					
Foreign producers' production from: Turkey					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Exports to U.S. (short tons)					
Foreign producers' exports to the U.S. from: Turkey					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
Share of exports to U.S. (percent)					
Foreign producers' exports to the U.S. from: Turkey					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.
Source: Compiled from data submitted in response to Commission questionnaires.

APPENDIX F

U.S. SHIPMENTS BY ALLOY TYPE (SERIES AND CLADDING) AND BY TEMPER TYPE

Table F-1: CAAS: U.S. producers' U.S. shipments by alloy type	F-3
Table F-2: CAAS: U.S. importers' U.S. shipments by alloy type.....	F-4
Table F-3: CAAS: U.S. producers' U.S. shipments by temper	F-28
Table F-4: CAAS: U.S. importers' U.S. shipments by temper	F-29

Table F-1

CAAS: U.S. producers' U.S. shipments by alloy type, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. producers' U.S. shipments:					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	1,004,972	907,245
	Value (1,000 dollars)				
U.S. producers' U.S. shipments:					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	3,340,900	2,611,926
	Unit value (dollars per short ton)				
U.S. producers' U.S. shipments:					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	3,324	2,879
	Share of quantity (percent)				
U.S. producers' U.S. shipments:					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. producers' U.S. shipments:					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	100.0	100.0	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires.

Table F-2
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Subject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Subject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Subject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Subject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Subject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Table continued on next page.

Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: All import sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	583,209	622,163	681,936	541,361	335,180
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: All import sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	1,512,670	2,087,523	2,264,711	1,799,123	983,198
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: All import sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	2,594	3,355	3,321	3,323	2,933
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: All import sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. importers' U.S. shipments from: All import sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	100.0	100.0	100.0	100.0	100.0

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Bahrain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Bahrain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Bahrain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Bahrain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Bahrain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Table continued on next page.

Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Brazil					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Brazil					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Brazil					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Brazil					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Brazil					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Table continued on next page.

Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Croatia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Croatia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Croatia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Croatia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Croatia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Egypt					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Egypt					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Egypt					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Egypt					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Egypt					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Table continued on next page.

Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Germany					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Germany					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Germany					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Germany					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Germany					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: India					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: India					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: India					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: India					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: India					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Indonesia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Indonesia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Indonesia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Indonesia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Indonesia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Italy (subject)					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Italy (subject)					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Italy (subject)					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Italy (subject)					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Italy (subject)					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Oman					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Oman					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Oman					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Oman					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Oman					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Quantity (short tons)					
U.S. importers' U.S. shipments from: Romania					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
Value (1,000 dollars)					
U.S. importers' U.S. shipments from: Romania					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
Unit value (dollars per short ton)					
U.S. importers' U.S. shipments from: Romania					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
Share of quantity (percent)					
U.S. importers' U.S. shipments from: Romania					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
Share of value (percent)					
U.S. importers' U.S. shipments from: Romania					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Serbia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Serbia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Serbia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Serbia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Serbia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Slovenia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Slovenia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Slovenia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Slovenia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Slovenia					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: South Africa Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: South Africa Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: South Africa Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: South Africa Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: South Africa Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Spain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Spain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Spain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Spain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Spain					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Taiwan					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Taiwan					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Taiwan					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Taiwan					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Taiwan					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Table continued on next page.

Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Turkey					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Turkey					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Turkey					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Turkey					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Turkey					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Table continued on next page.

Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Canada					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Canada					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Canada					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Canada					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Canada					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Greece					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Greece					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Greece					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Greece					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Greece					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Italy Laminazione Sottile Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Italy Laminazione Sottile Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Italy Laminazione Sottile Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Italy Laminazione Sottile Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Italy Laminazione Sottile Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Korea					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: Korea					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: Korea					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Korea					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: Korea					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

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Table F-2--Continued
CAAS: U.S. importers' U.S. shipments by alloy type, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: All other sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments from: All other sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Unit value (dollars per short ton)				
U.S. importers' U.S. shipments from: All other sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: All other sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments from: All other sources					
Non-clad 1XXX	***	***	***	***	***
Non-clad 3XXX	***	***	***	***	***
Non-clad 5XXX	***	***	***	***	***
Clad or multi-alloy	***	***	***	***	***
Other products	***	***	***	***	***
All alloy types	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Source: Compiled from data submitted in response to Commission questionnaires.

Table F-3
CAAS: U.S. producers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. producers' U.S. shipments:					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	1,004,972	907,245
	Share of quantity (percent)				
U.S. producers' U.S. shipments:					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table F-4
CAAS: U.S. importers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Subject sources					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Subject sources					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Nonsubject sources					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: All import sources					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: All import sources					
Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table F-4--Continued
CAAS: U.S. importers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Bahrain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Bahrain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Brazil Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Brazil Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Croatia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Croatia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Egypt Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Egypt Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table F-4--Continued
CAAS: U.S. importers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Germany Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Germany Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: India Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: India Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Indonesia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Indonesia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Italy Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Italy Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table F-4--Continued
CAAS: U.S. importers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Oman Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Oman Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Romania Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Romania Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Serbia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Serbia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Slovenia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Slovenia Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

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Table F-4--Continued
CAAS: U.S. importers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: South Africa Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: South Africa Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Spain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Spain Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Taiwan Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Taiwan Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Turkey Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Turkey Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Table continued on next page.

Table F-4--Continued
CAAS: U.S. importers' U.S. shipments by temper, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Canada Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Canada Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Greece Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Greece Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: Korea Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: Korea Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Quantity (short tons)				
U.S. importers' U.S. shipments from: All other sources Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments from: All other sources Final temper	***	***	***	***	***
F temper re-roll	***	***	***	***	***
All temper types	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.
Data for Italy include both subject and nonsubject import quantity figures.

Source: Compiled from data submitted in response to Commission questionnaires.

APPENDIX G

**INTERCHANGEABILITY AND FACTORS OTHER THAN PRICE
BETWEEN SUBJECT COUNTRIES**

Table G-1
CAAS: Interchangeability between product produced in the subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Bahrain vs. Brazil	9	---	---	---	5	7	1	1	6	1	1	---
Bahrain vs. Croatia	9	---	---	---	5	5	1	1	3	---	---	---
Bahrain vs. Egypt	9	---	---	---	5	7	1	1	4	---	1	---
Bahrain vs. Germany	9	---	---	---	5	6	2	1	4	1	1	---
Bahrain vs. India	9	---	---	---	5	8	1	1	5	3	3	---
Bahrain vs. Indonesia	9	---	---	---	5	7	1	1	5	2	---	---
Bahrain vs. Italy	9	---	---	---	5	8	1	1	4	2	1	---
Bahrain vs. Oman	9	---	---	---	5	7	1	2	4	1	2	---
Bahrain vs. Romania	9	---	---	---	5	5	1	1	3	1	1	---
Bahrain vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Bahrain vs. Slovenia	9	---	---	---	5	6	1	1	2	---	2	---
Bahrain vs. South Africa	9	---	---	---	5	7	1	1	4	2	---	---
Bahrain vs. Spain	9	---	---	---	5	7	1	1	3	1	4	---
Bahrain vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Bahrain vs. Turkey	9	---	---	---	5	6	2	2	3	---	3	1
Brazil vs. Croatia	9	---	---	---	5	5	1	1	3	---	---	---
Brazil vs. Egypt	9	---	---	---	5	6	1	1	5	---	1	---
Brazil vs. Germany	9	---	---	---	5	5	2	1	4	---	2	---
Brazil vs. India	9	---	---	---	5	7	2	1	6	1	3	---
Brazil vs. Indonesia	9	---	---	---	5	6	2	1	6	1	1	---
Brazil vs. Italy	9	---	---	---	5	6	2	1	4	---	2	---
Brazil vs. Oman	9	---	---	---	5	7	1	1	5	1	1	---
Brazil vs. Romania	9	---	---	---	5	5	1	1	4	1	---	---
Brazil vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Brazil vs. Slovenia	9	---	---	---	5	6	1	1	3	1	---	---
Brazil vs. South Africa	9	---	---	---	5	6	2	1	5	1	1	---
Brazil vs. Spain	9	---	---	---	5	6	1	1	3	1	3	---
Brazil vs. Taiwan	9	---	---	---	5	5	2	1	---	---	---	---
Brazil vs. Turkey	9	---	---	---	5	6	2	1	4	---	5	---
Croatia vs. Egypt	9	---	---	---	5	6	2	1	3	---	---	---
Croatia vs. Germany	9	---	---	---	5	5	1	1	3	---	---	---
Croatia vs. India	9	---	---	---	5	6	1	1	4	---	---	---
Croatia vs. Indonesia	9	---	---	---	5	6	1	1	3	---	---	---
Croatia vs. Italy	9	---	---	---	5	6	1	1	3	---	---	---
Croatia vs. Oman	9	---	---	---	5	6	1	1	3	1	---	---
Croatia vs. Romania	9	---	---	---	5	5	1	1	3	---	---	---
Croatia vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Croatia vs. Slovenia	9	---	---	---	5	6	1	1	2	---	---	---
Croatia vs. South Africa	9	---	---	---	5	6	1	1	3	---	---	---
Croatia vs. Spain	9	---	---	---	5	6	1	1	3	---	1	---
Croatia vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Croatia vs. Turkey	9	---	---	---	5	6	1	1	3	---	---	---

Table continued on next page.

Table G-1--Continued
CAAS: Interchangeability between product produced in the subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Egypt vs. Germany	9	---	---	---	5	5	2	1	4	1	1	---
Egypt vs. India	9	---	---	---	5	6	2	1	6	---	2	---
Egypt vs. Indonesia	9	---	---	---	5	6	2	1	5	---	2	---
Egypt vs. Italy	9	---	---	---	5	6	2	1	4	1	1	---
Egypt vs. Oman	9	---	---	---	5	6	1	1	4	1	---	---
Egypt vs. Romania	9	---	---	---	5	5	1	1	3	---	2	---
Egypt vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Egypt vs. Slovenia	9	---	---	---	5	6	1	1	3	1	---	---
Egypt vs. South Africa	9	---	---	---	5	6	2	1	4	---	3	---
Egypt vs. Spain	9	---	---	---	5	6	1	1	3	---	3	---
Egypt vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Egypt vs. Turkey	9	---	---	---	5	6	2	1	4	---	2	1
Germany vs. India	9	---	---	---	5	6	2	1	5	2	1	1
Germany vs. Indonesia	9	---	---	---	5	6	2	1	4	---	2	---
Germany vs. Italy	9	---	---	---	6	8	1	1	4	4	---	---
Germany vs. Oman	9	---	---	---	5	6	1	1	3	1	---	---
Germany vs. Romania	9	---	---	---	5	5	1	1	3	---	2	---
Germany vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Germany vs. Slovenia	9	---	---	---	5	6	1	1	2	1	---	---
Germany vs. South Africa	9	---	---	---	5	7	1	1	4	3	2	---
Germany vs. Spain	9	---	---	---	5	6	1	1	4	3	1	---
Germany vs. Taiwan	9	---	---	---	5	6	1	1	---	---	---	---
Germany vs. Turkey	9	---	---	---	6	6	3	1	3	1	1	1
India vs. Indonesia	9	---	---	---	5	6	2	1	5	1	2	---
India vs. Italy	9	---	---	---	5	6	2	1	4	1	2	---
India vs. Oman	9	---	---	---	5	7	1	1	4	1	3	---
India vs. Romania	9	---	---	---	5	5	1	1	4	1	---	---
India vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
India vs. Slovenia	9	---	---	---	5	6	1	1	3	---	1	---
India vs. South Africa	9	---	---	---	5	6	2	1	4	2	2	---
India vs. Spain	9	---	---	---	5	6	1	1	3	1	4	---
India vs. Taiwan	9	---	---	---	5	5	2	2	---	---	---	---
India vs. Turkey	9	---	---	---	5	6	2	1	4	1	4	---
Indonesia vs. Italy	9	---	---	---	5	6	2	1	4	---	2	---
Indonesia vs. Oman	9	---	---	---	5	6	1	1	5	1	---	---
Indonesia vs. Romania	9	---	---	---	5	5	1	1	4	1	---	---
Indonesia vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Indonesia vs. Slovenia	9	---	---	---	5	6	1	1	3	---	1	---
Indonesia vs. South Africa	9	---	---	---	5	6	2	1	4	1	2	---
Indonesia vs. Spain	9	---	---	---	5	6	1	1	3	---	4	---
Indonesia vs. Taiwan	9	---	---	---	5	5	2	1	---	---	---	---
Indonesia vs. Turkey	9	---	---	---	5	6	2	1	4	1	3	---

Table continued on next page.

Table G-1--Continued
CAAS: Interchangeability between product produced in the subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Italy vs. Oman	9	---	---	---	5	6	1	1	3	1	---	---
Italy vs. Romania	9	---	---	---	5	5	1	1	4	---	1	---
Italy vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Italy vs. Slovenia	9	---	---	---	5	6	1	1	2	1	---	---
Italy vs. South Africa	9	---	---	---	5	7	1	1	4	2	1	---
Italy vs. Spain	9	---	---	---	5	6	1	1	3	3	1	---
Italy vs. Taiwan	9	---	---	---	5	6	1	1	---	---	---	---
Italy vs. Turkey	9	---	---	---	6	6	3	1	3	1	1	1
Oman vs. Romania	9	---	---	---	5	5	1	1	3	---	---	---
Oman vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Oman vs. Slovenia	9	---	---	---	5	6	1	1	3	---	---	---
Oman vs. South Africa	9	---	---	---	5	7	1	1	4	---	---	---
Oman vs. Spain	9	---	---	---	5	6	1	1	3	---	2	---
Oman vs. Taiwan	9	---	---	---	5	6	1	1	---	---	---	---
Oman vs. Turkey	9	---	---	---	5	6	2	1	4	1	1	---
Romania vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Romania vs. Slovenia	9	---	---	---	5	6	1	1	2	1	---	---
Romania vs. South Africa	9	---	---	---	5	6	1	1	4	1	---	---
Romania vs. Spain	9	---	---	---	5	6	1	1	3	---	3	---
Romania vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Romania vs. Turkey	9	---	---	---	5	6	1	1	3	---	2	---
Serbia vs. Slovenia	9	---	---	---	5	6	1	1	2	---	---	---
Serbia vs. South Africa	9	---	---	---	5	6	1	1	3	---	---	---
Serbia vs. Spain	9	---	---	---	5	6	1	1	3	---	1	---
Serbia vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Serbia vs. Turkey	9	---	---	---	5	6	1	1	3	---	---	---
Slovenia vs. South Africa	9	---	---	---	5	6	1	1	4	---	1	---
Slovenia vs. Spain	9	---	---	---	5	6	1	1	3	---	2	---
Slovenia vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Slovenia vs. Turkey	9	---	---	---	5	6	1	1	4	1	---	---
South Africa vs. Spain	9	---	---	---	5	6	1	1	3	2	2	---
South Africa vs. Taiwan	9	---	---	---	5	5	2	1	---	---	---	---
South Africa vs. Turkey	9	---	---	---	5	6	2	1	4	---	2	1
Spain vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Spain vs. Turkey	10	---	---	---	6	6	1	1	3	1	2	1
Taiwan vs. Turkey	9	---	---	---	5	6	2	1	3	1	1	1
United States vs. Greece	9	---	---	---	12	13	5	1	7	5	3	1
Bahrain vs. Greece	9	---	---	---	5	7	1	1	4	1	1	---
Brazil vs. Greece	9	---	---	---	5	6	2	1	5	---	2	---
Croatia vs. Greece	9	---	---	---	5	6	1	1	3	---	---	---
Egypt vs. Greece	9	---	---	---	5	6	2	1	5	1	1	---
Germany vs. Greece	9	---	---	---	6	6	3	1	4	2	2	1

Table continued on next page.

Table G-1--Continued
CAAS: Interchangeability between product produced in the subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Greece vs. India	9	---	---	---	5	7	1	1	6	2	1	---
Greece vs. Indonesia	9	---	---	---	5	7	1	1	5	1	1	---
Greece vs. Italy	9	---	---	---	5	8	1	1	4	3	---	---
Greece vs. Oman	9	---	---	---	5	6	1	1	4	1	---	---
Greece vs. Romania	9	---	---	---	6	5	1	1	3	---	1	1
Greece vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Greece vs. Slovenia	9	---	---	---	5	6	1	1	3	1	---	---
Greece vs. South Africa	9	---	---	---	5	6	2	1	5	1	2	---
Greece vs. Spain	9	---	---	---	5	6	1	1	3	2	2	---
Greece vs. Taiwan	9	---	---	---	6	6	1	1	---	---	---	---
Greece vs. Turkey	9	---	---	---	5	6	3	1	4	1	1	1
United States vs. Korea	9	---	1	---	7	10	5	1	7	5	1	---
Bahrain vs. Korea	9	---	---	---	5	7	1	1	5	3	---	---
Brazil vs. Korea	9	---	---	---	6	6	1	1	6	1	1	---
Croatia vs. Korea	9	---	---	---	5	5	1	1	4	---	---	---
Egypt vs. Korea	9	---	---	---	6	5	1	1	6	---	1	---
Germany vs. Korea	9	---	---	---	5	6	1	1	5	2	1	---
India vs. Korea	9	---	---	---	5	6	2	1	5	2	2	---
Indonesia vs. Korea	9	---	---	---	5	5	2	1	5	1	1	---
Italy vs. Korea	9	---	---	---	5	6	1	1	5	2	1	---
Korea vs. Oman	9	---	---	---	5	7	1	1	3	1	1	---
Korea vs. Romania	9	---	---	---	5	5	1	1	3	1	1	---
Korea vs. Serbia	9	---	---	---	5	5	1	1	2	---	---	---
Korea vs. Slovenia	9	---	---	---	5	6	1	1	2	---	1	---
Korea vs. South Africa	9	---	---	---	5	6	1	1	3	3	---	1
Korea vs. Spain	9	---	---	---	5	6	1	1	3	2	2	---
Korea vs. Taiwan	9	---	---	---	5	5	1	1	---	---	---	---
Korea vs. Turkey	9	---	---	---	---	---	---	---	3	---	3	1
United States vs. Other	9	---	---	---	10	12	9	2	4	2	5	1
Bahrain vs. Other	9	---	---	---	5	5	2	1	2	1	1	---
Brazil vs. Other	9	---	---	---	5	5	2	1	3	1	2	---
Croatia vs. Other	9	---	---	---	5	5	1	1	2	1	---	---
Egypt vs. Other	9	---	---	---	5	5	2	1	3	2	1	---
Germany vs. Other	9	---	---	---	5	6	4	---	2	3	2	---
India vs. Other	9	---	---	---	5	5	2	1	3	1	2	---
Indonesia vs. Other	9	---	---	---	5	5	2	1	3	1	2	---
Italy vs. Other	9	---	---	---	5	6	2	1	2	1	2	---
Oman vs. Other	9	---	---	---	5	5	2	1	3	1	---	---
Romania vs. Other	9	---	---	---	6	5	1	1	2	1	1	---
Serbia vs. Other	9	---	---	---	5	5	1	1	2	1	---	---
Slovenia vs. Other	9	---	---	---	5	5	1	1	3	1	1	1
South Africa vs. Other	9	---	---	---	5	5	3	1	3	1	3	---

Table continued on next page.

Table G-1--Continued

CAAS: Interchangeability between product produced in the subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Spain vs. Other	9	---	---	---	5	5	1	1	2	1	1	---
Taiwan vs. Other	9	---	---	---	5	5	2	1	2	1	2	---
Turkey vs. Other	9	---	---	---	5	5	2	1	3	1	2	---
Greece vs. Korea	9	---	---	---	5	6	1	1	5	2	1	---
Greece vs. Other	9	---	---	---	6	5	3	1	3	1	2	1
Korea vs. Other	9	---	---	---	5	5	1	1	2	1	2	---

Source: Compiled from data submitted in response to Commission questionnaires.

Table G-2
CAAS: Perceived importance of factors other than price between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Bahrain vs. Brazil	---	---	---	9	1	2	6	5	---	---	7	3
Bahrain vs. Croatia	---	---	---	9	1	1	5	5	---	---	3	1
Bahrain vs. Egypt	---	---	---	9	1	1	7	5	---	---	5	1
Bahrain vs. Germany	---	---	---	9	1	2	6	5	---	---	6	1
Bahrain vs. India	---	---	---	9	1	1	8	5	---	---	8	2
Bahrain vs. Indonesia	---	---	---	9	1	2	5	5	---	---	6	1
Bahrain vs. Italy	---	---	---	9	1	2	7	5	---	---	6	1
Bahrain vs. Oman	---	---	---	9	2	1	8	5	---	---	5	2
Bahrain vs. Romania	---	---	---	9	1	1	4	5	---	---	5	1
Bahrain vs. Serbia	---	---	---	9	1	1	5	5	---	---	2	1
Bahrain vs. Slovenia	---	---	---	9	1	1	6	5	---	---	4	1
Bahrain vs. South Africa	---	---	---	9	1	2	5	5	---	---	6	1
Bahrain vs. Spain	---	---	---	9	1	2	5	5	---	---	7	2
Bahrain vs. Taiwan	---	---	---	9	1	1	4	5	---	---	---	---
Bahrain vs. Turkey	---	---	---	9	1	2	7	5	---	---	6	1
Brazil vs. Croatia	---	---	---	9	1	1	5	5	---	---	3	1
Brazil vs. Egypt	---	---	---	9	1	1	6	5	1	---	5	1
Brazil vs. Germany	---	---	---	9	1	1	6	5	---	---	6	1
Brazil vs. India	---	---	---	9	1	1	8	5	1	---	6	4
Brazil vs. Indonesia	---	---	---	9	1	1	6	5	1	---	7	1
Brazil vs. Italy	---	---	---	9	1	1	7	5	---	---	6	1
Brazil vs. Oman	---	---	---	9	2	1	7	5	1	---	4	3
Brazil vs. Romania	---	---	---	9	1	1	4	5	---	---	5	1
Brazil vs. Serbia	---	---	---	9	1	1	5	5	---	---	2	1
Brazil vs. Slovenia	---	---	---	9	1	1	6	5	1	---	4	1
Brazil vs. South Africa	---	---	---	9	1	1	7	5	1	---	6	1
Brazil vs. Spain	---	---	---	9	1	1	5	5	---	---	7	1
Brazil vs. Taiwan	---	---	---	9	1	1	5	5	---	---	---	---
Brazil vs. Turkey	---	---	---	9	1	1	7	5	1	---	6	1
Croatia vs. Egypt	---	---	---	9	1	1	6	5	---	---	5	1
Croatia vs. Germany	---	---	---	9	1	---	6	5	---	---	5	1
Croatia vs. India	---	---	---	9	1	---	7	5	---	---	5	2
Croatia vs. Indonesia	---	---	---	9	1	1	5	5	---	---	5	1
Croatia vs. Italy	---	---	---	9	1	---	7	5	---	---	5	1
Croatia vs. Oman	---	---	---	9	2	1	6	5	---	---	3	2
Croatia vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
Croatia vs. Serbia	---	---	---	9	1	---	5	6	---	---	2	1
Croatia vs. Slovenia	---	---	---	9	1	---	6	6	---	---	4	1
Croatia vs. South Africa	---	---	---	9	1	1	6	5	---	---	5	1
Croatia vs. Spain	---	---	---	9	1	---	6	5	---	---	6	1
Croatia vs. Taiwan	---	---	---	9	1	1	4	5	---	---	---	---
Croatia vs. Turkey	---	---	---	9	1	1	6	5	---	---	4	1

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Table G-2--Continued

CAAS: Perceived importance of factors other than price between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Egypt vs. Germany	---	---	---	9	1	1	6	5	---	---	6	1
Egypt vs. India	---	---	---	9	1	---	8	5	1	---	6	2
Egypt vs. Indonesia	---	---	---	9	1	---	7	5	1	---	6	1
Egypt vs. Italy	---	---	---	9	1	1	7	5	---	---	6	1
Egypt vs. Oman	---	---	---	9	2	---	7	5	1	---	3	2
Egypt vs. Romania	---	---	---	9	1	1	4	5	---	---	5	1
Egypt vs. Serbia	---	---	---	9	1	1	5	5	---	---	2	1
Egypt vs. Slovenia	---	---	---	9	1	1	6	5	1	---	4	1
Egypt vs. South Africa	---	---	---	9	1	---	7	5	1	---	6	1
Egypt vs. Spain	---	---	---	9	1	---	6	5	---	---	6	1
Egypt vs. Taiwan	---	---	---	9	1	---	6	5	---	---	---	---
Egypt vs. Turkey	---	---	---	9	1	---	8	5	1	---	5	1
Germany vs. India	---	---	---	9	1	1	7	5	1	---	7	2
Germany vs. Indonesia	---	---	---	9	1	1	7	4	---	---	6	1
Germany vs. Italy	---	---	---	9	1	1	8	6	---	2	6	1
Germany vs. Oman	---	---	---	9	2	1	6	5	---	---	3	2
Germany vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
Germany vs. Serbia	---	---	---	9	1	---	6	5	---	---	2	1
Germany vs. Slovenia	---	---	---	9	1	---	7	5	---	---	4	1
Germany vs. South Africa	---	---	---	9	2	2	5	5	1	2	6	1
Germany vs. Spain	---	---	---	9	1	---	6	5	---	---	7	2
Germany vs. Taiwan	---	---	---	9	1	1	5	5	---	---	---	---
Germany vs. Turkey	---	---	---	9	1	1	8	6	---	---	5	1
India vs. Indonesia	---	---	---	9	1	---	7	5	1	---	7	1
India vs. Italy	---	---	---	9	1	---	8	5	---	---	7	1
India vs. Oman	---	---	---	9	2	---	7	5	1	---	5	2
India vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
India vs. Serbia	---	---	---	9	1	---	6	5	---	---	2	1
India vs. Slovenia	---	---	---	9	1	---	7	5	1	---	4	1
India vs. South Africa	---	---	---	9	1	---	7	5	1	---	7	1
India vs. Spain	---	---	---	9	1	---	6	5	---	---	7	2
India vs. Taiwan	---	---	---	9	2	---	6	5	---	---	---	---
India vs. Turkey	---	---	---	9	1	---	8	5	1	---	6	1
Indonesia vs. Italy	---	---	---	9	1	---	8	5	---	---	6	1
Indonesia vs. Oman	---	---	---	9	2	---	8	5	1	---	3	3
Indonesia vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
Indonesia vs. Serbia	---	---	---	9	1	---	6	5	---	---	2	1
Indonesia vs. Slovenia	---	---	---	9	1	---	7	5	1	---	4	1
Indonesia vs. South Africa	---	---	---	9	1	---	7	5	1	---	6	1
Indonesia vs. Spain	---	---	---	9	1	---	6	5	---	---	7	1
Indonesia vs. Taiwan	---	---	---	9	1	---	6	5	---	---	---	---
Indonesia vs. Turkey	---	---	---	9	1	---	8	5	1	---	5	2

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Table G-2--Continued

CAAS: CAAS: Perceived importance of factors other than price between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Italy vs. Oman	---	---	---	9	2	1	6	5	---	---	3	2
Italy vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
Italy vs. Serbia	---	---	---	9	1	---	6	5	---	---	2	1
Italy vs. Slovenia	---	---	---	9	1	---	7	5	---	---	4	1
Italy vs. South Africa	---	---	---	9	1	2	6	5	---	1	5	1
Italy vs. Spain	---	---	---	9	1	1	5	5	---	---	6	1
Italy vs. Taiwan	---	---	---	9	1	1	5	5	---	---	---	---
Italy vs. Turkey	---	---	---	9	1	1	8	6	---	---	5	1
Oman vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
Oman vs. Serbia	---	---	---	9	1	---	6	5	1	---	2	1
Oman vs. Slovenia	---	---	---	9	1	---	7	5	1	---	4	1
Oman vs. South Africa	---	---	---	9	1	---	6	5	1	---	5	1
Oman vs. Spain	---	---	---	9	1	---	6	5	---	---	7	1
Oman vs. Taiwan	---	---	---	9	1	---	5	5	---	---	---	---
Oman vs. Turkey	---	---	---	9	1	---	7	5	1	---	6	1
Romania vs. Serbia	---	---	---	9	1	---	6	5	---	---	2	1
Romania vs. Slovenia	---	---	---	9	1	---	7	5	---	---	4	1
Romania vs. South Africa	---	---	---	9	1	1	5	5	---	---	5	1
Romania vs. Spain	---	---	---	9	1	---	6	5	---	---	6	1
Romania vs. Taiwan	---	---	---	9	1	1	4	5	---	---	---	---
Romania vs. Turkey	---	---	---	9	1	1	6	5	---	---	4	1
Serbia vs. Slovenia	---	---	---	9	1	1	6	5	---	---	4	1
Serbia vs. South Africa	---	---	---	9	1	1	6	5	---	---	5	1
Serbia vs. Spain	---	---	---	9	1	1	5	5	---	---	6	1
Serbia vs. Taiwan	---	---	---	9	1	1	4	5	---	---	---	---
Serbia vs. Turkey	---	---	---	9	1	1	6	5	---	---	4	1
Slovenia vs. South Africa	---	---	---	9	1	1	6	5	1	---	5	1
Slovenia vs. Spain	---	---	---	9	1	1	5	5	---	---	6	1
Slovenia vs. Taiwan	---	---	---	9	1	1	4	5	---	---	---	---
Slovenia vs. Turkey	---	---	---	9	1	1	6	5	1	---	4	1
South Africa vs. Spain	---	---	---	9	1	1	5	5	---	---	7	1
South Africa vs. Taiwan	---	---	---	9	1	1	5	5	---	---	---	---
South Africa vs. Turkey	---	---	---	9	1	1	7	5	1	---	5	1
Spain vs. Taiwan	---	---	---	9	1	---	5	5	---	---	---	---
Spain vs. Turkey	---	---	---	9	1	---	7	5	---	---	5	1
Taiwan vs. Turkey	---	---	---	9	1	---	8	5	---	---	5	1
United States vs. Greece	---	---	---	10	7	4	11	9	6	3	7	1
Bahrain vs. Greece	---	---	---	9	1	1	7	5	---	---	6	1
Brazil vs. Greece	---	---	---	9	1	1	7	5	1	---	6	1
Croatia vs. Greece	---	---	---	9	1	---	7	6	---	---	5	1
Egypt vs. Greece	---	---	---	9	1	1	7	5	1	---	6	1
Germany vs. Greece	---	---	---	9	2	---	9	5	2	---	7	1

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Table G-2--Continued

CAAS: CAAS: Perceived importance of factors other than price between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Greece vs. India	---	---	---	9	1	2	6	5	1	1	5	2
Greece vs. Indonesia	---	---	---	9	1	2	5	5	1	1	5	1
Greece vs. Italy	---	---	---	9	1	1	8	5	---	1	5	1
Greece vs. Oman	---	---	---	9	2	1	6	5	1	---	3	3
Greece vs. Romania	---	---	---	9	1	---	6	5	---	---	5	1
Greece vs. Serbia	---	---	---	9	1	1	5	5	---	---	2	1
Greece vs. Slovenia	---	---	---	9	1	1	6	5	1	---	4	1
Greece vs. South Africa	---	---	---	9	1	1	7	5	1	---	6	1
Greece vs. Spain	---	---	---	9	1	1	5	5	---	---	6	1
Greece vs. Taiwan	---	---	---	9	1	1	5	5	---	---	---	---
Greece vs. Turkey	---	---	---	9	1	---	9	5	1	---	5	1
United States vs. Korea	---	---	---	10	2	2	11	7	1	4	8	2
Bahrain vs. Korea	---	---	---	9	1	2	5	5	---	---	6	3
Brazil vs. Korea	---	---	---	9	2	1	5	5	1	---	6	2
Croatia vs. Korea	---	---	---	9	1	1	4	5	---	---	5	2
Egypt vs. Korea	---	---	---	9	2	---	5	5	1	---	5	2
Germany vs. Korea	---	---	---	9	1	2	4	5	---	1	6	2
India vs. Korea	---	---	---	9	1	---	7	5	---	---	7	2
Indonesia vs. Korea	---	---	---	9	1	---	6	5	---	---	6	2
Italy vs. Korea	---	---	---	9	1	2	4	5	---	1	5	2
Korea vs. Oman	---	---	---	9	2	---	7	5	---	---	4	2
Korea vs. Romania	---	---	---	9	1	---	5	5	---	---	5	1
Korea vs. Serbia	---	---	---	9	1	---	6	5	---	---	2	1
Korea vs. Slovenia	---	---	---	9	1	---	7	5	---	---	4	1
Korea vs. South Africa	---	---	---	9	1	1	6	5	---	1	6	1
Korea vs. Spain	---	---	---	9	1	---	6	5	---	---	7	1
Korea vs. Taiwan	---	---	---	9	1	1	5	5	---	---	---	---
Korea vs. Turkey	---	---	---	9	---	---	---	---	---	---	6	1
United States vs. Other	---	---	---	9	6	5	13	10	3	---	8	1
Bahrain vs. Other	---	---	---	9	1	---	7	5	---	---	5	1
Brazil vs. Other	---	---	---	9	1	1	6	5	1	---	6	1
Croatia vs. Other	---	---	---	9	1	1	5	5	---	---	5	1
Egypt vs. Other	---	---	---	9	1	---	7	5	1	---	6	1
Germany vs. Other	---	---	---	9	1	1	8	5	1	---	7	1
India vs. Other	---	---	---	9	1	---	7	5	1	---	6	1
Indonesia vs. Other	---	---	---	9	1	---	7	5	1	---	6	1
Italy vs. Other	---	---	---	9	1	1	7	5	---	---	6	1
Oman vs. Other	---	---	---	9	1	---	6	5	1	---	5	1
Romania vs. Other	---	---	---	9	1	---	7	5	---	---	5	1
Serbia vs. Other	---	---	---	9	1	1	5	5	---	---	5	1
Slovenia vs. Other	---	---	---	9	1	1	5	5	1	---	5	1
South Africa vs. Other	---	---	---	9	2	1	6	5	2	---	6	1

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Table G-2--Continued

CAAS: CAAS: Perceived importance of factors other than price between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
Spain vs. Other	---	---	---	9	1	---	6	5	---	---	6	1
Taiwan vs. Other	---	---	---	9	1	---	7	5	---	---	6	1
Turkey vs. Other	---	---	---	9	1	1	7	5	1	---	5	1
Greece vs. Korea	---	---	---	9	1	2	4	5	---	1	5	2
Greece vs. Other	---	---	---	9	1	1	7	5	1	---	5	1
Korea vs. Other	---	---	---	9	1	---	7	5	---	---	6	1

Source: Compiled from data submitted in response to Commission questionnaires.

APPENDIX H
NONSUBJECT COUNTRY PRICE DATA

Importers reported price data for Canada, Greece, Italian producer Laminazione Sottile, and Korea for pricing products 1, 2, and 4.¹ Price data reported for nonsubject sources accounted for *** percent of U.S. commercial shipments from Canada, *** percent of U.S. commercial shipments from Greece, *** percent of imports from Italian producer Laminazione Sottile, and *** percent of U.S. commercial shipments from Korea. These price items and accompanying data are comparable to those presented in tables V-4, V-5, and V-7. Price and quantity data for Canada, Greece, nonsubject Italian producer Laminazione Sottile, and Korea are shown in tables H-1 through H-3 and in figures H-1 through H-3 (with domestic and subject sources).

In comparing nonsubject country pricing data with U.S. producer pricing data where comparisons are available, prices for product imported from nonsubject sources were lower than U.S. prices in 30 of 56 instances, and higher than U.S. prices in the remaining 26 instances. In comparing nonsubject country pricing data with subject country pricing data, prices for product imported from nonsubject sources were higher than prices for product imported from subject countries in 32 of 56 instances and lower in the 24 remaining instances. A summary of price differentials is presented in table H-4.

¹ *** reported data for Canada, seven importers reported data for Greece, four importers reported data for Korea, and *** reported data for Italian producer Laminazione Sottile.

Table H-1
CAAS: Weighted-average f.o.b. prices and quantities of imported product 1, by quarters, January 2017-September 2020

Period	United States		Greece		Korea	
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2020:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***

Note: Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Table H-2
CAAS: Weighted-average f.o.b. prices and quantities of imported product 2, by quarters, January 2017-September 2020

Period	United States		Canada		Greece	
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2020:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***

Table continued on next page.

Table H-2--Continued

CAAS: Weighted-average f.o.b. prices and quantities of imported product 2, by quarters, January 2017-September 2020

Period	Italy, nonsubject		Korea	
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)
2017:				
Jan.-Mar.	***	***	***	***
Apr.-Jun.	***	***	***	***
Jul.-Sep.	***	***	***	***
Oct.-Dec.	***	***	***	***
2018:				
Jan.-Mar.	***	***	***	***
Apr.-Jun.	***	***	***	***
Jul.-Sep.	***	***	***	***
Oct.-Dec.	***	***	***	***
2019:				
Jan.-Mar.	***	***	***	***
Apr.-Jun.	***	***	***	***
Jul.-Sep.	***	***	***	***
Oct.-Dec.	***	***	***	***
2020:				
Jan.-Mar.	***	***	***	***
Apr.-Jun.	***	***	***	***
Jul.-Sep.	***	***	***	***

Note: Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Table H-3
CAAS: Weighted-average f.o.b. prices and quantities of imported product 4, by quarters, January 2017-September 2020

Period	United States		Greece		Korea	
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2020:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***

Note: Product 4: Alloy 3003, H-14 temper, 0.063" thick, 48" wide.

Source: Compiled from data submitted in response to Commission questionnaires.

Figure H-1
CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by
quarters, January 2017-September 2020

* * * * *

Figure H-2
CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by
quarters, January 2017-September 2020

* * * * *

Figure H-3
CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by
quarters, January 2017-September 2020

* * * * *

Table H-4
CAAS: Summary of underselling/(overselling), by country, January 2017-September 2020

Comparison	Total number of comparisons	Lower		Higher	
		Number of quarters	Quantity (pounds)	Number of quarters	Quantity (pounds)
Nonsubject source vs United States.--					
Canada vs. United States	***	***	***	***	***
Greece vs. United States	***	***	***	***	***
Italy, nonsubject vs. United States	***	***	***	***	***
Korea vs. United States	***	***	***	***	***
Nonsubject source vs subject sources.--					
Canada vs subject sources	***	***	***	***	***
Greece vs. subject sources	***	***	***	***	***
Italy, nonsubject vs. subject sources	***	***	***	***	***
Korea vs. subject sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

